

# Memo

**To:** Township Board  
**From:** Holly Brandt, Clerk  
**Date:** May 9, 2019  
**Re:** Joel Hack & Wren Beaulieu-Hack Litigation vs. Charter Township of Milford

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As you will recall, in regard to the Joel Q. Hack, et. al. (Plaintiffs) vs. the Charter Township of Milford, et. al. (Defendants) US District Court litigation, the deposition of Plaintiff's builder, Bill Rogers, was taken on April 9, 2019, and the deposition of Plaintiff's engineer, Brett LaVanway, was taken on April 10, 2019.

On April 19, 2019, the Township filed the attached Defendants' Motion for Leave to File Second Motion for Summary Judgment, stating that the parties have engaged in significant discovery including the depositions of Plaintiffs, whereby Plaintiffs made it abundantly clear that they do not have valid or legal claims against Defendants Donald Green or Timothy Brandt in their individual capacity. As such, the Township requested the Court grant summary dismissal for the two Defendants on the basis of qualified immunity.

Shortly thereafter, on April 23, 2019 and April 24, 2019, the Township Building Official, Tim Brandt, and its Code Enforcement Officer, Bill Bozynski, had their depositions taken. Township residents, David and Valerie Mamo, also had depositions taken on April 30, 2019.

On May 3, 2019, Plaintiffs filed the attached Response to Defendants' Motion for Leave to File Second Motion for Summary Judgment, stating that Defendants motion is premature and should be denied by the Court. The Court has not yet granted Defendants Motion for Leave or scheduled oral arguments in that regard.

The deposition of Township Supervisor, Donald Green, and Township Board Trustee, Bill Mazzara, are scheduled for May 16 and 17, 2019.