

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JOEL Q. HACK, an individual, and  
WREN BEAULIEU-HACK, an individual,

Plaintiffs,

Hon. Marianne O. Battani  
Case No. 2:18-cv-13330

v.

THE CHARTER TOWNSHIP OF MILFORD,  
a Michigan municipal corporation, TOWNSHIP  
OF MILFORD BOARD, a public body,  
DONALD D. GREEN, in his personal capacity and  
in his official capacity as Supervisor of Milford  
Township, and TIMOTHY C. BRANDT, in his  
personal capacity and in his official capacity as  
Building and Zoning Administrator of Milford Township,

Defendants.

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**DEFENDANTS' INITIAL WITNESS LIST**

**NOW COME** the Defendants, **THE CHARTER TOWNSHIP OF MILFORD, TOWNSHIP OF MILFORD BOARD, DONALD D. GREEN** and **TIMOTHY C. BRANDT** and for their Initial Witness List, state as follows:

1. Joel Q. Hack, c/o Maddin, Hauser, Roth & Heller, P.C., 28400 Northwestern Hwy, 2<sup>nd</sup> Floor, Southfield, MI 48034

2. Wren Beaulieu-Hack, c/o Maddin, Hauser, Roth & Heller, P.C., 28400 Northwestern Hwy, 2nd Floor, Southfield, MI 48034

3. Timothy C. Brandt, c/o O'Connor, DeGrazia, Tamm & O'Connor, P.C., 40701 Woodward Avenue, Ste. 105, Bloomfield Hills, MI 48304

4. Donald D. Green, c/o O'Connor, DeGrazia, Tamm & O'Connor, P.C., 40701 Woodward Avenue, Ste. 105, Bloomfield Hills, MI 48304

5. Any and all present and/or former employees, agents, servants and records custodians of the Charter Township of Milford and/or the Township of Milford Board, c/o O'Connor, DeGrazia, Tamm & O'Connor, P.C., 40701 Woodward Avenue, Ste. 105, Bloomfield Hills, MI 48304, including, but not limited to:

- a. Holly Brandt
- b. Dale Wiltse
- c. William Mazzara
- d. Brien Worrell
- e. Cynthia Dagenhardt
- f. Randal Busick
- g. Thomas Moore

- h. Tom Lindberg
- i. Natalie Scime
- j. Bill Bozynski
- k. Ruth Tessman
- l. George Magro
- m. Vaughn Koshkarian
- n. Gordon Muir
- o. Myles Davis
- p. David Latka
- q. Julie Ryszka
- r. Neill DeVries
- s. Christopher Winn
- t. Terrell Tucker
- u. Linda Cananaugh
- v. Richard Huber
- w. Edward Clink
- x. Keith Cheresko
- y. Patti Janette
- z. Pam Zurek
- aa. Ken Borycz
- bb. Ray Kee

6. Any and all present and/or former employees, agents, servants and records custodians of Hubbell, Roth & Clark, Inc., c/o Sullivan, Ward, Asher & Patton, P.C., 25800 Northwestern Hwy, Southfield, MI 48075, including, but not limited to:

- a. Michael P. Darga
- b. Ronald Alix

7. Any and all present and/or former employees, agents, servants and records custodians of Boss Engineering, 3121 E. Grand River, Howell, MI 48843, including, but not limited to:

a. Brent LaVanway

b. Bill Rodgers

8. Any and all present and/or former employees, agents, servants and records custodians of Hartland Septic Service, 7230 Faussett Road, Fenton, MI 48430, including, but not limited to:

a. Jeff Boutell

9. Any and all present and/or former employees, agents, servants and records custodians of EBI, Inc., 10454 Grand River, Brighton, MI 48116, including, but not limited to:

a. William Rogers

10. David Mamo, 2488 Pearson, Milford, MI 48380

11. Valerie Mamo, 2488 Pearson, Milford, MI 48380

12. Jennifer H. Elowsky, Baker & Elowsky, PLLC, 41850 W. 11 Mile Road, Ste. 207, Novi, MI 48375

13. Chris Nelson

14. Alyssa Pouliot

15. Donald Pietila

16. Brian Ray

17. Chet Atkins

18. Norm Bourns

19. Michael Aravas

20. Frank Rhodes

21. Joe Kaighen

22. Leigh-Anne Stafford

23. Any and all present and/or former employees, agents, servants and records custodians of the following entities or organizations:

- a. Oakland County Drain Commission
- b. Medicare
- c. Medicaid
- d. Internal Revenue Service
- e. Michigan State Treasury
- f. United States Treasury
- g. Social Security Administration
- h. R.J. McCoy Co.
- i. Hartland Insurance (Auto Owners)
- j. Oakland County Health Division
- k. MAS Mechanical
- l. Don's Plumbing & Heating
- m. Bray Electric
- n. MAS Mechanical

24. Kumar Seema, M.D., 5640 W. Maple Road, Ste. 306, West Bloomfield, Michigan 48322

25. Alicia Tisdale, Ph.D., 5665 W. Maple Road, West Bloomfield, Michigan 48322

26. Bernie Les, Ph.D. 120 West Main Street, Ste. 301, Northville, Michigan 48167

27. Roy Rose, Anderson Eckstein & Westrick, Inc., 51301 Schoenherr Road, Shelby Township, MI 48315 (potential engineering/construction expert)

28. Any and all of Plaintiffs' treating medical providers.

29. Any and all individuals present at the Milford Township Board meetings of September 19, 2018 and/or October 17, 2018.

30. Any and all persons named in depositions, written discovery, document production, correspondence and/or pleadings.

31. Any and all necessary rebuttal witnesses.

32. Any and all persons necessary to authenticate records and/or photographs and/or videotapes.

33. Any and all individuals with knowledge of the events alleged in Plaintiffs' Complaint.

34. Any and all witnesses identified on the parties' Rule 26 initial disclosures.

35. Any and all witnesses listed on Plaintiffs' witness list(s).

36. Any and all witnesses learned in the course of discovery.

37. Any and all witnesses, including expert witnesses, whose testimony is required in the interests of justice.

38. Defendants reserve the right to elicit expert testimony from individuals with a professional designation within their relevant field of expertise.

39. Defendants reserve the right to amend this witness list as facts and circumstances become known.

Respectfully submitted,

O'CONNOR, DEGRAZIA, TAMM & O'CONNOR, P.C.

BY: /s/ Michael J. Bonvolanta

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Dated: February 4, 2019

### **PROOF OF SERVICE**

Jemmis F. Lawrence states that on February 4, 2019, on behalf of Defendants she served the attached *Defendants' Witness List* and *Proof of Service* upon counsel of record via e-filing with the ECF Filing system to their e-mail addresses of record.

/s/ Jemmis F. Lawrence

[jflawrence@odtlegal.com](mailto:jflawrence@odtlegal.com)