

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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

Plaintiffs,

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

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.

PLAINTIFFS' INITIAL WITNESS LIST

Pursuant to the parties' stipulated Discovery Plan, Plaintiffs, through their counsel, Maddin, Hauser, Roth & Heller, P.C., state for their Initial Witness List, as follows:

1. Kumar Seema, M.D., 5640 W Maple Rd #306, West Bloomfield Township, Michigan 48322.
2. Alicia Tisdale, Ph.D., 5665 W. Maple Rd., West Bloomfield, Michigan 48322.
3. Bernie Les, Ph.D., 120 West Main Street, Suite 301, Northville, Michigan 48167.

4. Joel Q. Hack, c/o counsel.
5. Wren Beaulieu-Hack, c/o counsel.
6. William (Bill) Rogers, EBI Inc., c/o counsel.
7. Brent LaVanway, Boss Engineering, 3121 East Grand River, Howell, MI 48843, c/o counsel.
8. Jeff Boutell, Hartland Septic Service, 7230 Faussett Rd, Fenton, Michigan 48430, c/o counsel.
9. Bill Bozynski, c/o counsel.
10. Donald D. Green, c/o counsel.
11. Timothy C. Brandt, c/o counsel.
12. Holly Brandt, c/o counsel.
13. Dale Wiltse, c/o counsel
14. Cindy Dagenhardt, c/o counsel
15. Brian Worrell, c/o counsel
16. Holly Brandt, c/o counsel
17. William Mazzara, c/o counsel.
18. Michael Darga, Hubbell, Roth and Clark, Inc., 105 West Grand River, Howell, Michigan 4883.
19. Roland Alix, Hubbell, Roth and Clark, Inc., 105 West Grand River, Howell, Michigan 4883.
20. David Mamo, 2488 Pearson, Milford, MI 48380.
21. Valerie Mamo, 2488 Pearson, Milford, MI 48380.

22. Kenneth Silver, Esq., Hertz Schram PC, 1760 South Telegraph Road, Suite 300, Bloomfield Hills, Michigan 48302.

23. Jennifer H. Elowsky, Esq., Baker & Elowsky, PLLC, 41850 W. 11 Mile Road, Suite 207, Novi, MI 48375.

24. Past, present and future employees, agents, representatives and/or record custodians of The Charter Township of Milford, c/o, counsel.

25. Past, present and future employees, agents, representatives and/or record custodians of Township of Milford Board, including but not limited to Holly Brandt, Cynthia Dagenhardt, Donald Green, Randal Busick, William Mazzara, Dale Wiltse, and Brien Worrell, c/o, counsel.

26. Past, present and future employees, agents, representatives and/or record custodians of Township of Milford Planning Commission, including but not limited to George Magro, Vaughn Koshkarian, Gordon Muir, Myles Davis, William Mazzara, Christopher Winn, David Latka, Neill DeVries, and Julie Ryszka, c/o, counsel.

27. Past, present and future employees, agents, representatives and/or record custodians of Township of Milford Zoning Board of Appeals, including but not limited to Dale Wiltse, Linda Cavanaugh, Neill DeVries, Keith Cheresko, Edward Clink and Patti Janette, c/o, counsel.

28. Past, present and future employees, agents, representatives and/or record custodians of Hubbell, Roth & Clark, Inc., including but not limited to Roland N. Alix, 555 Hulet Drive, Bloomfield Hills, MI 48302.

29. Any and all individuals whose names appear on any document produced by any party or in response to any subpoena served by any party.

30. Any and all individuals whose names appear on any document in any other legal action or proceeding which relates to the issues in this case.

31. Any and all persons named in response to discovery requests or in any pleadings.

32. Any and all persons whose names appear on any document produced by any party to this case or any nonparty.

33. Any and persons served with a Subpoena in this case.

34. Any and all witnesses identified or listed by Defendants.

35. Any and all witnesses who are deposed in this case.

36. Any and all witnesses whose testimony is used in rebuttal or impeachment.

37. Any and all persons whose testimony is used for authentication of any document or exhibit or to lay foundation for the admission of evidence.

38. Plaintiffs reserve the right to identify other individuals as discovery proceeds and as other individuals are identified.

Respectfully submitted,

/s/ R.J. Cronkhite
R.J. Cronkhite (P78374)
Maddin, Hauser, Roth & Heller, P.C.
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Dated: February 1, 2019

CERTIFICATE OF SERVICE

I hereby certify that on **February 1, 2019**, I electronically filed the above document(s) with the Clerk of the Court using the ECF system, which will send notification of such filing to those who are currently on the list to receive e-mail notices for this case.

/s/ R.J. Cronkhite
Attorney for Plaintiffs