

Exhibit A

December 21, 2018 Correspondence

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

RICHARD M. O'CONNOR
JAMES E. TAMM
JULIE McCANN O'CONNOR
LAURI B. STEWART
RICHARD V. STOKAN, Jr.
PAUL M. INDYK
STEPHANIE A. KARISNY
MICHAEL J. BONVOLANTA

ATTORNEYS AND COUNSELORS AT LAW
40701 WOODWARD AVENUE - SUITE 105
BLOOMFIELD HILLS, MICHIGAN 48304

JAMES I. DeGRAZIA
(1945-2005)

TELEPHONE
(248) 433-2000

FAX
(248) 433-2001

E-MAIL
rvstokan@odilegal.com

December 21, 2018

Mr. Kevin Gleeson
Sullivan, Ward, Asher & Patton, P.C.
25800 Northwestern Highway, Ste. 1000
Southfield MI 48075
kgleeson@swappc.com

**Re: Joel Hack and Wren Beaulieu-Hack v Charter Township of Milford
Case No. 18-cv-13330
Our File No.: 100.4085**

Dear Mr. Gleeson:

PRIVILEGED ATTORNEY-CLIENT/WORK PRODUCT MATERIAL

Please allow this correspondence to confirm that the Township is asserting attorney-client privilege and attorney work product privilege over any emails, correspondence and/or communications between representatives of Hubble Roth & Clark, Inc. and the offices of the Township Attorney Jennifer Elowsky. See *Sandra T.E. v. South Berwyn School Dist.* 100 600 F.3d 612, 619 (7th Cir.2010) (citing *Upjohn Co. v. United States*, 449 U.S. 383, 394-99, 101 S.Ct. 677, 66 L.Ed.2d 584 (1981)). Plaintiffs' counsel is prohibited from seeking discovery of attorney work product prepared in anticipated of litigation pursuant to Fed.R.Civ.P. 26(b)(3). See *Hickman v. Taylor*, 329 U.S. 495, 67 S.Ct. 385, 91 L.Ed. 451 (1947).

It is our position that any communications between Ms. Elowsky's office and representatives of Hubble Roth & Clark, Inc., including but not limited to Michael P. Darga, P.E., are subject to the above attorney client and/or attorney work produce privileged because the communications were generated for the purposes of supplying legal advice to the Township and in anticipation of litigation. As a result we respectfully request that Hubble Roth & Clark, Inc. refrain from disclosing any such communications without prior written consent of this office.

Thank you for your consideration.

Very truly yours,

Richard V. Stokan, Jr.

Richard V. Stokan, Jr.

RVS/cp

cc: James E. Tamm, Esq.