

STATE OF MICHIGAN

IN THE 6TH CIRCUIT COURT FOR THE COUNTY OF OAKLAND

MILFORD HILLS PROPERTIES,
INC., a Michigan Corporation
and
RPL of MICHIGAN, INC.,
a Michigan Corporation.

Plaintiffs,

v

Hon. D. Langford Morris
Case No. 2017-162642-CZ

CHARTER TOWNSHIP OF MILFORD,
a Michigan charter township.

Defendant.

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Attorney for Plaintiffs
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NOTICE OF TAKING DEPOSITION DUCES TECUM
OF R. DONALD WORTMAN

PLEASE TAKE NOTICE that the Plaintiff, MILFORD HILLS PROPERTIES, INC.
and RPL of MICHIGAN, INC., will take the deposition upon oral examination of R.
Donald Wortman, before a Notary Public in and for the County of Livingston, State of
Michigan, at the office of Attorney James E. Tamm, O'CONNOR DE GRAZIA TAMM &

O'CONNOR, PC, located at 40701 Woodward Ave., Ste 105, Bloomfield Hills, Michigan, commencing at 10:00 a.m. on Monday, December 17, 2018 and continue thereafter until completed. This deposition will be taken for all purposes authorized under the Michigan Court Rules.

The deponent is directed to bring with him all materials, including, but not limited to the complete file, all memoranda, documents, records, reports, engineering reports, permits, letters, e-mails; including, but not limited to contracts between the Township and R.P.L. of Michigan, Inc. and Milford Hills Properties, Inc., Ridge Valley and/or Bridge Valley Master Association and the Community Sewer System and contracts of any kind or nature relating to the above-referenced cause of action.

LAW OFFICE OF PAUL E. BURNS
Attorney for Plaintiff



Dated: December 13, 2018

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