## STATE OF MICHIGAN

## IN THE 6<sup>TH</sup> 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.

LAW OFFICE OF PAUL E. BURNS Attorney for Plaintiffs By: Paul E. Burns (P31596) 133 West Grand River Brighton, Michigan 48116 (810) 227-5000

LUCAS LAW, PC Co-Counsel for Plaintiffs By: Frederick Lucas (P29074) 7577 US 12, Ste A Onsted, Michigan 49265 (517) 467-4000 O'CONNOR, DeGRAZIA, TAMM & O'CONNOR, P.C. JAMES E. TAMM (P38154) RICHARD V. STOKAN, JR. (P61997) Attorneys for Defendant 40701 Woodward Avenue, Ste. 105 Bloomfield Hills, MI 48304 (248) 433-2000

## NOTICE OF TAKING DEPOSITION DUCES TECUM OF PAUL M. LEBLANC

PLEASE TAKE NOTICE that the Plaintiff, MILFORD HILLS PROPERTIES, INC., and RPL of MICHIGAN, INC., will take the deposition upon oral examination of Paul M. LeBlanc, 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.

Dated: December 13, 2018

PAUL E. BURNS (P31596) 133 West Grand River Brighton, Michigan 48116 (810) 227-5000

Attorne∕y∖for Plaintiff

LAW OFFICE OF PAUL E. BURNS