

# Memo

**To:** Township Board  
**From:** Holly Brandt, Clerk  
**Date:** July 12, 2019  
**Re:** Joel Hack & Wren Beaulieu-Hack Litigation vs. Charter Township of Milford

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In regard to the Joel Q. Hack, et. al. (Plaintiffs) vs. the Charter Township of Milford, et. al. (Defendants) US District Court litigation, the following pleadings were filed (most will be sent in separate emails) and the following proceedings occurred:

- June 18, 2019 – Plaintiffs filed their Reply to the Township’s Response to Plaintiffs’ Motion for Preliminary Injunction, which was filed on May 30, 2019, requesting the Court prohibit the Township from stopping the implementation of driveway improvements by Plaintiffs, as set forth in their own Boss Engineering plans (Plaintiffs’ Reply and Exhibits A-C sent in separate email).
- June 19, 2019 – Plaintiffs filed a Response to the Township’s Motion to Adjourn the Trial (attached to this email).
- June 20, 2019 – Hearing conducted in US District Court regarding Plaintiffs Emergency Motion for Preliminary Injunction, Plaintiffs Motion to Compel Email Production, and the Township’s Motion to Adjourn the Trial. Judge Battani stated that she would not rule upon Plaintiffs’ Motion for Preliminary Injunction until the trial, which is set to begin July 16, 2019. The Court also indicated that the Motions in Limine filed by the Township would be heard at the July 11, 2019 pre-trial conference, and the Township’s Second Motion for Summary Judgment would be heard at the trial.
- June 25, 2019 – Plaintiffs filed their Response to the Township’s various Motions in Limine (Plaintiffs’ Response, Index and Exhibits A-E sent in separate email), largely alleging that the Township singled out the Plaintiffs based upon their religion.

- July 1, 2019 – The Township filed its Reply to Plaintiffs’ Response to the Township’s Motions in Limine (see attached).
- July 3, 2019 – Plaintiffs issued subpoenas to several individuals for appearance at trial.
- July 5, 2019 – Plaintiffs filed a Response to the Township’s Second Motion for Summary Judgment (Motion, Index and Exhibits A-Y sent in separate email), largely alleging that the Township refused ingress and egress by Plaintiffs and emergency vehicles to Plaintiffs property, and neither the Supervisor nor the Building Official are entitled to immunity because they allowed close friendships with Plaintiffs’ neighbors to interfere with fair and equal treatment of Plaintiffs.
- July 9, 2019 – The Court issued an Order denying the Township’s request to adjourn the trial (see attached).
- July 11, 2019 – The Court conducted a pre-trial conference in order to discuss last minutes details and negotiations prior to trial, and to hear arguments related to the Township’s Motions in Limine.