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Transcript of the Testimony of
Valerie Mamo

Date: April 30, 2019

Volume:

Case: HACK AND BEAULIEU-HACK v. THE CHARTER
TOWNSHIP OF MILFORD

Printed On: May 6, 2019

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4/30/2019

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">United STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION JOEL Q. HACK, an individual, and WREN BEAULIEU-HACK, an individual,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs. Case No. 2:18-cv-1333 Hon. Marianne O. Battani</p> <p>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,</p> <p style="text-align: center;">Defendants.</p> <hr style="border-top: 1px dashed black;"/> <p style="text-align: center;">DEPOSITION OF VALERIE MAMO, taken on Tuesday, April 30, 2019, at 1760 South Telegraph Road, Suite 200, Bloomfield Hills, Michigan, at 12:35 p.m. pursuant to notice.</p> <p style="text-align: center;">REPORTED BY: LAURI A. SHELDON, RPR, CSR 4045</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">WITNESS INDEX</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 85%;">Witness</th> <th style="width: 10%;">Page</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>VALERIE MAMO</td> <td></td> </tr> <tr> <td>2</td> <td>Bloomfield Hills, Michigan</td> <td></td> </tr> <tr> <td>3</td> <td>Direct Examination by MR. CRONKHITE</td> <td>4</td> </tr> <tr> <td>4</td> <td>////</td> <td></td> </tr> <tr> <td>5</td> <td>////</td> <td></td> </tr> <tr> <td>6</td> <td>////</td> <td></td> </tr> <tr> <td>7</td> <td>////</td> <td></td> </tr> <tr> <td>8</td> <td>////</td> <td></td> </tr> <tr> <td>9</td> <td>////</td> <td></td> </tr> <tr> <td>10</td> <td>////</td> <td></td> </tr> <tr> <td>11</td> <td>////</td> <td></td> </tr> <tr> <td>12</td> <td>////</td> <td></td> </tr> <tr> <td>13</td> <td>////</td> <td></td> </tr> <tr> <td>14</td> <td>////</td> <td></td> </tr> <tr> <td>15</td> <td>////</td> <td></td> </tr> <tr> <td>16</td> <td>////</td> <td></td> </tr> <tr> <td>17</td> <td>////</td> <td></td> </tr> <tr> <td>18</td> <td>////</td> <td></td> </tr> <tr> <td>19</td> <td>////</td> <td></td> </tr> <tr> <td>20</td> <td>////</td> <td></td> </tr> <tr> <td>21</td> <td>////</td> <td></td> </tr> <tr> <td>22</td> <td>////</td> <td></td> </tr> <tr> <td>23</td> <td>////</td> <td></td> </tr> <tr> <td>24</td> <td>////</td> <td></td> </tr> <tr> <td>25</td> <td>////</td> <td></td> </tr> </tbody> </table>		Witness	Page	1	VALERIE MAMO		2	Bloomfield Hills, Michigan		3	Direct Examination by MR. CRONKHITE	4	4	////		5	////		6	////		7	////		8	////		9	////		10	////		11	////		12	////		13	////		14	////		15	////		16	////		17	////		18	////		19	////		20	////		21	////		22	////		23	////		24	////		25	////	
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<p style="text-align: right;">Page 2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1 Appearing for Plaintiff: 2 R.J. CRONKHITE (P78374) 3 MADDIN, HAUSER, ROTH & HELLER, P.C. 4 28400 Northwestern Highway Second Floor 5 Southfield, Michigan 48034 6 248-351-7017 7 rcronkhite@maddinhauser.com 8 Appearing for Plaintiffs.</p> <p>9 Appearing for Defendant: 10 RICHARD V. STOKAN, JR. (P61997) 11 O'CONNOR, DEGRAZIA, TAMM & O'CONNOR, P.C. 12 40701 Woodward Avenue, Suite 105 13 Bloomfield Hills, Michigan 48303 14 248-433-2000 15 jetamm@odtlegal.com 16 Appearing for Defendants.</p> <p>17 KENNETH SILVER 18 HERTZ SCHRAM, P.C. 19 1760 South Telegraph Road, Suite 200, 20 1000 Maccabees Center 21 Bloomfield Hills, Michigan 48302 22 Appearing for witness, David Mamo.</p>	<p style="text-align: right;">Page 4</p> <p>1 Bloomfield Hills, Michigan 2 April 30, 2019 3 12:35 p.m.</p> <p>4 5 6 7 8 VALERIE MAMO 9 having been duly sworn testified as follows: 10 MR. CRONKHITE: Good afternoon. How do you go 11 by, your name? Is it Mamo or Mamo? 12 THE WITNESS: Mamo. 13 MR. CRONKHITE: Mamo. Gosh, three variations. 14 MR. STOKAN: Yeah, I'm in trouble. I already 15 know. 16 MR. CRONKHITE: May I call you Valerie? 17 THE WITNESS: You may. 18 MR. CRONKHITE: Thank you. 19 * * * * *</p> <p style="text-align: center;">D I R E C T E X A M I N A T I O N</p> <p>20 21 BY MR. CRONKHITE: 22 Q Valerie, could you give me your full name for the 23 record? 24 A Valerie (Jean) Mamo. 25 Q Valerie, have you been deposed before?</p>																																																																														

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1 A Nope.

2 Q So your attorney has probably gone over this with you.

3 I'll just reiterate some points he probably already told

4 you about. So it's basically a question-and-answer

5 session. I'm going to be asking some questions. If you

6 understand the question, you answer it using words as

7 opposed to hm-hmms or nods or shakes of your head,

8 because she is writing everything down, my questions and

9 your answers. So if you use words, that makes her job a

10 whole lot easier. Okay?

11 A Can I ask a question?

12 Q Absolutely.

13 A Who am I talking to? I don't know who -- who --

14 MR. SILVER: This gentleman will be asking you

15 questions.

16 THE WITNESS: Okay.

17 MR. SILVER: And you'll be answering his

18 questions.

19 THE WITNESS: Okay.

20 MR. SILVER: And then this gentleman will ask

21 you questions and you'll answer his questions.

22 THE WITNESS: Okay.

23 MR. CRONKHITE: And there might be a third

24 round, but probably not.

25 Q (Continuing by Mr. Cronkhite): If you don't understand a

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1 question that I ask, let me know, and I'll rephrase it

2 or ask different question. If you answer my questions,

3 I'm going to assume you understand them. Is that fair?

4 A Yes.

5 Q Okay. You are under oath, which means that you're

6 subject to perjury if you lie today. Do you understand?

7 A I understand.

8 Q Okay. Who first observed water coming from the Hacks'

9 property onto the Mamos' property and when?

10 MR. STOKAN: Object to foundation.

11 Q (Continuing by Mr. Cronkhite): Okay. So let me -- So

12 your attorney and Mr. Stokan may make objections to some

13 of my questions. Unless Mr. Silver instructs you not to

14 answer the question, just let the objection be fully

15 spoken and then you can answer my question. Okay?

16 Nonetheless, I'm going to ask a different question.

17 You're aware that you and your husband, David,

18 have informed Milford Township of your belief that the

19 Hacks' construction is causing water to go from the

20 Hacks' property onto your property, correct?

21 A David informed them.

22 Q David informed them, not you, correct?

23 A No.

24 Q Correct?

25 A Correct. I did not.

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1 Q When did that notification first happen, as far as you

2 know?

3 A I'm not sure.

4 Q Have you actually observed water flowing from the Hacks'

5 property onto your property?

6 A Yes.

7 Q Okay. And then did you take any photographs or videos

8 of that?

9 A No videos. No photographs.

10 Q Have you -- You've had water sitting on your property in

11 the past before the Hacks began their construction

12 activities, correct?

13 A Can you repeat the question?

14 Q You've had water standing on your property in the past

15 before the Hacks ever began construction on their

16 property, correct?

17 A Yes.

18 Q Okay. And if I understand it correctly, based on what

19 David explained to me, that is seasonal in nature, that

20 during winter/spring months there tends to be more

21 standing water on your property, correct?

22 A I'm not sure.

23 Q Based on your experience being at the property for some

24 three decades now, is there is a rhyme or reason to when

25 you have standing water on your property?

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1 A Is there a rhyme or reason . . .

2 MR. SILVER: If you know.

3 THE WITNESS: I guess I don't understand the

4 question.

5 Q (Continuing by Mr. Cronkhite): Sure. So do you know

6 whether the water is standing on your property during

7 particular periods of time or under certain

8 circumstances?

9 A Under certain circumstance.

10 Q Such as what?

11 A The way the weather pattern goes that year.

12 Q Okay. So, for instance, if there's heavy rainfall, that

13 would affect the amount of standing water on your

14 property.

15 A I'm not a scientist, so I don't know whether -- You

16 know, I don't -- I can't predict or say, and I don't

17 notice a pattern.

18 Q Oh, I thought you said that based on certain weather

19 patterns in any given year that --

20 A I said in general that would be under any circumstance.

21 Q Okay. And so my question is, if there were heavy

22 rainfalls during a particular day or week or month, that

23 could affect the amount of standing water that is on

24 your property based on your personal observations.

25 A Yes.

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1 Q Okay. When did you first notice water going from the
 2 Hacks' property to your property?
 3 A Again, I don't know. I can't -- I told you before I'm
 4 not sure when it all started.
 5 Q Oh, okay. I'm sorry, I didn't even realize you said
 6 that. So you don't know when it began. Do you know
 7 whether water was coming from the Hacks' property onto
 8 your property before they began construction?
 9 A Is your question asking me before they --
 10 MR. SILVER: Excuse me.
 11 THE WITNESS: Okay.
 12 MR. SILVER: If you don't understand the
 13 question, just say so, and Mr. Cronkhite will --
 14 THE WITNESS: Repeat that question.
 15 MR. SILVER: -- clarify. Otherwise, just
 16 answer the question that he asks.
 17 THE WITNESS: Okay.
 18 Q (Continuing by Mr. Cronkhite): So had you seen water
 19 coming from the parcel that is immediately to your
 20 property's west, coming from that parcel onto your
 21 property before the Hacks started building their home
 22 there?
 23 A No.
 24 Q The water that you observed coming from the Hacks'
 25 property to your property, that appears to occur during

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1 periods of higher precipitation; is that fair?
 2 A Yes.
 3 Q Okay. And if I understand it correctly, based on your
 4 husband's testimony, that water flow is through the
 5 wooded area north of the Hacks' home.
 6 A Well, I don't know how to answer that, because I don't
 7 have --
 8 MR. SILVER: Just say so.
 9 THE WITNESS: Okay. I don't have --
 10 Q (Continuing by Mr. Cronkhite): Well, let me show you a
 11 photograph.
 12 A Okay. Show me a photograph.
 13 Q Maybe this will help orient you. So this document, this
 14 photo, has been marked as Exhibit 60. Do you recognize
 15 this general area of land?
 16 A Yes.
 17 Q Okay. And does this depict a wooded area behind both
 18 the Hacks' home and your home?
 19 A Yes.
 20 Q Okay. That's in the forefront of the picture.
 21 A My property is here.
 22 Q Right. And then the wooded area away from -- toward the
 23 top of the picture is the Hacks' wooded area, correct?
 24 A Hm-hmm.
 25 Q Yes?

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1 A Yes.
 2 Q She can't write down hm-hmms. So this shows water flow,
 3 we don't know which direction, but it shows water on
 4 both the Hacks' property and your property, correct?
 5 A Yes.
 6 Q Okay. And is this water flow going through what you
 7 would describe as the woods north of the Hacks' home?
 8 A Yes.
 9 Q Okay. And to circle back to my question, when you have
 10 observed what you believe to be water flow from the
 11 Hacks' property onto your property, it's through the
 12 wooded area of the Hacks' property, correct?
 13 A I never observed it. I never went there to look at it.
 14 Q Oh.
 15 A I see water on my property, but I don't see it flowing.
 16 I didn't take those pictures.
 17 Q So you don't -- So you don't have personal knowledge of
 18 water actually going from the Hacks' property to your
 19 property.
 20 A I've seen those pictures.
 21 Q Okay. But you've never actually seen that in person.
 22 A Other than a picture or video, I haven't seen it. I
 23 don't look out there. I don't go out there.
 24 Q Is this a concern of yours or your husband's in terms of
 25 water possibly coming from the Hacks' property onto your

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1 property?
 2 A I would say both.
 3 Q Okay. So given that it's your joint concern, you
 4 haven't thought to go investigate to see the water flow?
 5 A No.
 6 Q You haven't thought to or you have looked at it?
 7 A I've seen the video and I've seen the picture, but I
 8 don't make it a part of -- a point to go out there and
 9 watch when there's rain or snow to go take a look at the
 10 water flow. I see the flood, I see the elevation of
 11 water in my backyard, but I don't go look to investigate
 12 that.
 13 Q Okay. So you have never yourself seen in person water
 14 coming from the Hacks' property onto your own, correct?
 15 A I haven't looked for it.
 16 Q Is that a yes?
 17 MR. SILVER: That's her answer.
 18 MR. CRONKHITE: It's not responsive, Ken. My
 19 question is --
 20 MR. SILVER: It is responsive.
 21 MR. CRONKHITE: It's not responsive to my
 22 question.
 23 MR. SILVER: I'm not going to argue with you.
 24 Just --
 25 MR. CRONKHITE: I'm entitled to my question

3 (Pages 9 to 12)

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1 and I'm entitled to an answer.
 2 Q (Continuing by Mr. Cronkhite): So my question is this,
 3 Ma'am, and it's a very specific question: You haven't
 4 personally observed water flowing from the Hacks'
 5 property onto your property; is that accurate?
 6 A I don't know that I have walked out there to see what
 7 David has taken pictures of, correct, the water flow.
 8 I've seen the result of elevation of water on my
 9 property, but I have not gone to take a look for a water
 10 flow pattern.
 11 Q Okay. You don't know why you have had elevated water
 12 levels in your backyard since the Hacks constructed
 13 their home, correct?
 14 A I don't know why, you're saying?
 15 Q For instance, you don't know if heavy rainfalls may have
 16 caused the elevated water levels --
 17 A Well, seeing I've been there for 31 years and the only
 18 difference in my property is the nextdoor house built,
 19 my assumption would be it's coming from that.
 20 Q Okay. It's your assumption, right?
 21 A Exactly.
 22 Q What if I were to tell you that in 2018 your area of
 23 Michigan experienced the fourth wettest year on record?
 24 Would that help potentially explain why you had the
 25 amount of water you had in your backyard during that

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1 time?
 2 A No.
 3 Q Okay. So at some point when Mr. -- I'll just call him
 4 David -- when David complained to Milford that he
 5 believed water was being diverted onto his property from
 6 the Hacks' construction, an official from Milford
 7 Township came out to your property, correct?
 8 A Yes.
 9 Q Mr. Bill Bozynski.
 10 A I don't know.
 11 Q You don't remember his name. You met with him, correct?
 12 A What's the company name?
 13 Q This is Milford Township. So --
 14 A I don't remember Bozynski.
 15 Q Do you remember a Milford Township official or employee
 16 coming out to your property?
 17 A Is there an ordinance officer? Would that be who you're
 18 talking about?
 19 Q A code enforcement officer.
 20 MR. SILVER: Just a reminder to the witness,
 21 let Mr. Cronkhite ask the questions.
 22 THE WITNESS: Okay.
 23 Q (Continuing by Mr. Cronkhite): A code enforcement
 24 officer. Do you remember --
 25 A I did meet once with one one time.

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1 Q Okay. You don't remember his name.
 2 A No.
 3 Q It was a gentleman?
 4 A Yes.
 5 Q He was in his fifties, maybe -- fifties probably?
 6 A I don't know.
 7 Q And what is your understanding of why that gentleman
 8 visited your property?
 9 A So he could look at the property nextdoor and the
 10 drainage.
 11 Q And did you -- What did you tell this gentleman about
 12 the water issue?
 13 A I showed him the area that was of concern and I allowed
 14 him to walk back on my property to look at it.
 15 Q Okay. Were you with him?
 16 A Yes.
 17 Q Okay. So when you were with him you didn't observe
 18 water at that time --
 19 A No.
 20 Q Let me finish the question. You didn't observe water at
 21 that time coming from the Hacks' property onto your
 22 property, correct?
 23 A I did not.
 24 Q Okay. What exactly did you tell Mr. Bozynski, the
 25 gentleman from Milford, about your opinion regarding the

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1 water situation?
 2 A Well, that was a year ago, so I do not recall my
 3 conversation with him.
 4 Q Do you remember generally what you told him?
 5 A I do not remember.
 6 Q Is it fair to say you would have explained to him that
 7 you believed that the Hacks' construction was causing
 8 water potentially to come onto your property?
 9 A I don't know if we had that conversation.
 10 Q Okay. But you understood that the gentleman was out
 11 there to investigate that complaint that your husband
 12 made.
 13 A I understand that.
 14 Q Okay. What did Mr. -- What did the Milford Township
 15 official tell you during that visit?
 16 A I don't recall.
 17 Q Okay.
 18 A He was observing.
 19 Q If that gentleman concluded that -- Well, let me back
 20 up.
 21 At the time that he visited, the standing water
 22 on your property wasn't present, correct?
 23 A I don't remember.
 24 Q Okay. If that gentleman concluded in his investigative
 25 report that the reason for any standing water that had

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1 been on your property was due to the 4-inch heavy
2 rainfall that had recently occurred, would that surprise
3 you?
4 A Repeat that.
5 Q So the gentleman that came out --
6 A Yeah.
7 Q -- and walked your land wrote an investigative report
8 afterwards, and he concluded that the water that had
9 been on your property but dissipated by the time of his
10 visit was caused by a 4-inch rainstorm that had recently
11 occurred. My question to you is does that conclusion
12 surprise you?
13 A No.
14 Q You remember February of 2018 being a particularly rainy
15 month, don't you?
16 A '18, I don't remember that.
17 Q You're aware that your husband was considering
18 purchasing the Hacks' parcel before they purchased it,
19 correct?
20 A Yes.
21 Q You had discussed that with him?
22 A Yes.
23 Q And what did -- Did you want to purchase that parcel as
24 well?
25 A We had talked about it.

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1 Q Okay. And what were your plans for that parcel if you
2 did buy it?
3 A There was two things we were either going to do; put our
4 horses there for grazing or build.
5 Q What were you going to build?
6 A A home.
7 Q A second home?
8 A It was a hypothetical thought. Not for us. It wouldn't
9 be for us.
10 Q Oh, to sell it?
11 A One of our kids.
12 Q Oh, I see. And you ultimately did not purchase that
13 parcel. Do you know why?
14 A We didn't think it was a good investment.
15 Q Too expensive?
16 A No.
17 Q Did you have studies done on the property?
18 A No.
19 Q What led you to consider purchasing the property to
20 concluding it wasn't a good investment?
21 A We decided for the amount of money that we could
22 purchase that land for we could either use it -- we
23 could use the money elsewhere.
24 Q Okay. So you wanted to use the money that would have
25 been used to purchase that parcel on different goals.

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1 A Yes.
2 Q You've had time to observe the Hacks' parcel before they
3 started construction on it, correct?
4 A You mean the vacant land?
5 Q Right. When it was in its vacant state.
6 A Yes.
7 Q And it's fair to say that that parcel, seasonally at
8 least, contained quite a lot of water.
9 A Yes.
10 Q Did you go onto the Hacks' property to take certain
11 photographs?
12 A No.
13 Q I want to show you what's been marked previously as
14 Exhibit 75. This is the fourth photograph of that
15 exhibit. Do you recognize that as being your husband's
16 photograph?
17 A Yes.
18 Q Okay. Do you know who took this photograph?
19 A No.
20 Q You did not take it.
21 A No. This is -- This is the Hacks' property you're
22 saying?
23 Q Correct. This is the Hacks' -- This is your husband
24 standing on my client's property, and he said "Obviously
25 I didn't take this picture because I'm in it." He

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1 didn't know whether you took it or someone else took it.
2 A I don't recall that.
3 Q Okay. Is it safe to say that the only reason you
4 believe that the Hacks' construction is causing water to
5 come onto your property is because you didn't observe
6 water coming onto your property from that parcel before
7 they began construction?
8 A That's correct.
9 Q Okay. And you based your belief that there's water flow
10 coming from the Hacks' property onto your property
11 strictly on what you've seen in photos or on video,
12 because you've never personally observed the water flow
13 from the Hacks' property onto yours, correct?
14 A No. Correct.
15 Q Right. So your belief that there's water coming from
16 the Hacks' property onto your property is based on the
17 fact that they built a home and then you've seen after
18 the home -- or during the home's construction certain
19 photographs and videos that shows some water you believe
20 coming from of the Hacks' property onto your property.
21 A I believe the only change for the amount of water on my
22 property is based on the fact that there's a new
23 construction nextdoor.
24 Q Okay. And you're basing that on --
25 A 30 years.

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1 Q -- not just the timing, but the fact -- but the
 2 photographs and the videos, having never directly
 3 observed it yourself.
 4 A I have not seen water dripping down onto my property.
 5 Q You don't know whether the water's flowing from your
 6 property onto their property, do you?
 7 A Do I know that? I don't know that.
 8 Q There's not as much water on your property right now as
 9 there was in 2018 during this time of year, correct?
 10 A 2018? I don't know. My property is very sandy, it
 11 drains well, so any water that it gets goes --
 12 dissipates within a day or two usually.
 13 Q So I'll show you what's been marked as Exhibit 75,
 14 photograph 6. So do you recognize --
 15 A Yes.
 16 Q -- this amount of water as being how much water was on
 17 your property between your barn and your house in
 18 roughly February of 2018?
 19 A This is the most water I've ever seen on my property.
 20 Q Okay.
 21 A And it was leaking into the barn.
 22 Q Okay. And this was in February of 2018, approximately?
 23 A It was last year. I don't know what month.
 24 Q Okay. Around that vicinity, early 2018?
 25 A Between January and March.

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1 Q Okay.
 2 A How's that?
 3 Q That's good. Thank you. My question is you haven't
 4 seen this amount of water in 2019 on your property,
 5 correct?
 6 A It didn't come up to my barn. It came up to -- It came
 7 up to right about here, but it didn't go into my barn
 8 this year.
 9 Q Okay. Your husband testified that it was 50 percent
 10 less than what's depicted in this photograph 6 of
 11 Exhibit 75. Is that fair?
 12 A 50 percent? It didn't go -- It didn't go into the barn
 13 this year. I don't know how far up to the barn it went.
 14 Q There's less water now than there was during the time
 15 this photograph was taken.
 16 A There's less water now this year between January and now
 17 than there was last year.
 18 Q Okay. That water, too, drains from your property fairly
 19 quickly, correct?
 20 A Yes.
 21 Q Couple days?
 22 A I know I had to keep my horses off of it for a long time
 23 last year.
 24 Q It's not so bad this year.
 25 A We still had pooling of water last year, but I would say

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1 it might have been average to a little bit more than
 2 prior to that house being there.
 3 Q In 2019 you mean.
 4 A This year.
 5 Q Okay. You said it was averaged -- It's comparable to
 6 what was happening before they built, but maybe a little
 7 bit more to the time frame of -- Let me rephrase that.
 8 A That's what I said.
 9 Q Let me rephrase it. It's a bad question.
 10 You testified that the water that you
 11 experienced in 2019 on your property is comparable to
 12 the average amount of water or a little bit more than
 13 what would have occurred on the Hacks' property
 14 preconstruction.
 15 MR. SILVER: Object to form.
 16 THE WITNESS: On my property.
 17 Q (Continuing by Mr. Cronkhite): Yeah, that would have
 18 happened on your property before the Hacks began
 19 construction.
 20 A Yes.
 21 Q Okay. I have no further questions.
 22 MR. STOKAN: I have no questions.
 23 MR. SILVER: Great.
 24 MR. CRONKHITE: Thank you.
 25 MR. STOKAN: All right.

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1 (Whereupon the deposition was concluded at or
 2 about the hour of 1:03 p.m.)
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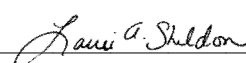

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1 STATE OF MICHIGAN)
2)ss.
3 COUNTY OF MACOMB)
4
5

6 I certify that this transcript is a complete, true
7 and accurate record of the testimony of VALERIE MAMO to the
8 best of my ability.
9

10 I also certify that prior to taking this deposition
11 VALERIE MAMO was duly sworn by me to tell the truth.
12

13 I also certify that I am not a relative or employee
14 of a party, or a relative or employee of an attorney for a
15 party, have a contract with a party, or am financially
16 interested in the aforementioned action.
17

18
19
20  

21 Lauri A. Sheldon, RPR, CSR-4045
22 Notary Public, Macomb County, Michigan
23 My commission expires: 2-8-2022
24
25

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