

STATE OF MICHIGAN
GENESEE COUNTY CIRCUIT COURT

Melissa Mays, individually and as next friend of three
minor children C.M.1, C.M.2 and C.M.3, Michael
Adam Mays, Jacqueline Pemberton, Keith John Pemberton,
Elnora Carthan, and Rhonda Kelso, individually and as
next friend of one minor child K.E.K, all on behalf of themselves
and a class of all others similarly situated,

Plaintiffs,

CLASS ACTION
Case No. 16-106112

vs.

Hon. Archie L. Hayman

City of Flint, a municipal corporation, Receivership Transition Advisory
Board, a municipal agency, Natasha Henderson, Eden Victoria Wells,
M.D., Stephen Busch, Liane Shekter-Smith, Adam Rosenthal, Patrick
Cook, Michael Prysby, Bradley Wurfel, Howard Croft, Michael Glasgow
and Daugherty Johnson, jointly and severally,
Defendants.

William Goodman P14173
Julie H. Hurwitz P34720
Kathryn Broner James (P71374)
Goodman & Hurwitz, PC
1394 E. Jefferson Ave.
Detroit, MI 48207
313-567-6170
bgoodman@goodmanhurwitz.com
jhurwitz@goodmanhurwitz.com
kjames@goodmanhurwitz.com

Michael L. Pitt P24429
Cary S. McGehee P42318
Beth M. Rivers P36614
Peggy Goldberg Pitt P31407
Pitt McGehee Palmer & Rivers, PC
117 W. Fourth Street, Suite 200
Royal Oak, MI 48067
248-398-9800
mpitt@pittlawpc.com
cmcgehee@pittlawpc.com
brivers@pittlawpc.com
ppitt@pittlawpc.com

Trachelle C. Young P63330
Trachelle C Young & Associates PLLC
2501 N Saginaw St
Flint, MI 48505-4443
810-239-6302
trachelleyoung@gmail.com

Deborah A. La Belle P31595
Law Offices of Deborah A. La Belle
221 N Main St Ste 300
Ann Arbor, MI 48104-1166
734-996-5620
deblabelle@aol.com

**NOTICE OF TAKING DEPOSITION AND SUBPOENA FOR DOCUMENTS ONLY
DIRECTED TO MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY**

To: Michigan Department of Environmental Quality

PLEASE TAKE NOTICE that Plaintiffs through their attorneys, Pitt McGehee Palmer & Rivers, P.C., pursuant to MCR 2.305 will take the deposition for documents only of **Michigan Department of Environmental Quality** on **Tuesday, February 9, 2016 at 11:00 a.m.** at the offices of Pitt McGehee Palmer & Rivers, P.C., 117 W. Fourth Street, Suite 200, Royal Oak, MI 48067.

At the above deposition, the deponent will be required to produce for inspection and copying any and all documents identified in the attached Subpoena.

The undersigned counsel does not propose to examine deponent; the proceeding is solely for the purpose of inspecting and/or copying the records.

By: 

Michael L. Pitt P24429

Cary S. McGehee P42318

Beth M. Rivers P36614

Peggy Goldberg Pitt P31407

Pitt McGehee Palmer & Rivers, PC

117 W. Fourth Street, Suite 200

Royal Oak, MI 48067

248-398-9800

mpitt@pittlawpc.com

cmcgehee@pittlawpc.com

brivers@pittlawpc.com

ppitt@pittlawpc.com

Dated: January 25, 2016