

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,

CLASS ACTION

Plaintiffs,

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
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NOTICE OF TAKING DEPOSITION AND SUBPOENA FOR DOCUMENTS ONLY
DIRECTED TO GOVERNOR RICK SNYDER

To: Governor Rick Snyder

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 **Governor Rick Snyder 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
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Dated: January 25, 2016

Approved, SCAO

Original - Return
1st copy - Witness
2nd copy - File
3rd copy - Extra

STATE OF MICHIGAN JUDICIAL DISTRICT 7th JUDICIAL CIRCUIT COUNTY PROBATE	SUBPOENA Order to Appear and/or Produce	CASE NO. 16-106112 Hon. Archie L. Hayman
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Court address 900 s. Saginaw St., Flint, MI 48502 Court telephone no. (810) 257-3230

Police Report No. (if applicable):

Plaintiff(s)/Petitioner(s) <input type="checkbox"/> People of the State of Michigan <input checked="" type="checkbox"/> <u>Melissa Mays et al</u>	v	Defendant(s)/Respondent(s) City of Flint et al
<input checked="" type="checkbox"/> Civil <input type="checkbox"/> Criminal	Charge	
<input type="checkbox"/> Probate In the matter of _____		

In the Name of the People of the State of Michigan. TO:

Governor Rick Snyder, 111 S. Capital Ave., Lansing, MI 48909

If you require special accommodations to use the court because of disabilities, please contact the court immediately to make arrangements.

YOU ARE ORDERED TO:

1. Appear personally at the time and place stated below: You may be required to appear from time to time and day to day until excused.

The court address above Other: Pitt McGehee Palmer & Rivers, P.C., 117 W. Fourth St., #200, Royal Oak, MI 48067

Day Tuesday	Date February 9, 2016	Time 11:00 a.m.
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2. Testify at trial / examination / hearing.

3. Produce/permit inspection or copying of the following items: See Addendum to Subpoena

4. Testify as to your assets, and bring with you the items listed in line 3 above.

5. Testify at deposition.

6. Abide by the attached prohibition against transferring or disposing of property. (MCL 600.6104(2), 600.6116, or 600.6119.)

7. Other: _____

<input checked="" type="checkbox"/> 8. Person requesting subpoena Cary S. McGehee	Telephone no. (248) 398-9800
Address 117 W. Fourth Street, Suite 200	
City Royal Oak	State Zip MI 48067



NOTE: If requesting a debtor's examination under MCL 600.6110, or an injunction under item 6, this subpoena must be issued by a judge. For a debtor examination, the affidavit of debtor examination on the other side of this form must also be completed. Debtor's assets can also be discovered through MCR 2.305 without the need for an affidavit of debtor examination or issuance of this subpoena by a judge.

FAILURE TO OBEY THE COMMANDS OF THE SUBPOENA OR TO APPEAR AT THE STATED TIME AND PLACE MAY SUBJECT YOU TO PENALTY FOR CONTEMPT OF COURT.

01/25/2016
Date

Judge/Clerk/Attorney

42318
Bar no.

Court use only	
<input type="checkbox"/> Served	<input type="checkbox"/> Not served

ADDEDUM TO SUBPOENA TO GOVERNOR SNYDER

DEFINITIONS

1. For purposes of this subpoena, "Governor" means Governor Snyder or any member of the Governor's staff or his Executive Office at any time from January 1, 2011 to date, and Emergency Managers Darnell Earley, Gerald Ambrose, Michael Brown and Edward Kurtz.

2. For purposes of this subpoena, "Governor's Office" means any member of the Governor's staff or his Executive Office or anyone and everyone otherwise working directly for the Governor from January 1, 2011 to date, including but not limited to Michigan Treasurer Andy Dillon and his Staff, and Emergency Managers Darnell Earley, Gerald Ambrose, Michael Brown and Edward Kurtz.

3. For purposes of this subpoena, "documents" means writings, letters, e-mails and text messages, reports and memoranda along with any attachments, electronically stored documents, hard copy documents, photos, videos and audio recordings.

4. For purposes of this subpoena, "KWA" means the Karegnondi Water Authority.

Subpoenaed Documents

1. Produce all documents sent to or received by the Governor and/or the Governor's Office from any source regarding the use or potential use of the Flint River as a municipal water source, Flint water quality, Flint water system, and/or KWA, from January 1, 2011 the present.
2. Produce all documents generated or sent by the Governor and/or the Governor's Office to any recipient regarding the use or potential use of the Flint River as a municipal water source, Flint River water quality, Flint water system, and/or KWA, from January 1, 2011 to the present.