

Goodman & Hurwitz, P.C.
1394 East Jefferson
Detroit, Michigan 48207
(313) 567-6170

August 15, 2008

BY E-MAIL AND REGULAR MAIL

August 15, 2008

--HAND DELIVERED--

Sharon McPhail
General Counsel, City of Detroit
11th Floor
1126 Coleman A. Young Municipal Center
Detroit, Michigan 48226

Re: request for document production

Dear Ms. McPhail,

Your most recent letter has finally prompted us to insist that henceforth you file formal pleadings, keeping in mind the following:

1. Please indicate which of the two cases – a) Council forfeiture; and b) Governor’s Removal – are addressed by your submission. This recent letter is a good example since the e-mail attachment is labeled “gov case” yet you refer me to a letter in which I suggested that you contact Judge Shakoor for a certain request. Since Judge Shakoor is the advisor to the Council in the forfeiture case, he has nothing to do with the Governor’s removal proceeding;
2. Since this last request is labeled a “Request for the Production of Documents,” it presumes a discovery mechanism that I am not certain exists. If it does, we intend to submit formal discovery requests to your client as well. Regardless, we must insist that you file a formal document that looks like a request for production so that we can respond to specific and discreet requests, or object thereto. By the way, much of this “Request” is not a request for production at all, but rather a log dissertation on many subjects, such as why you cannot/should not provide a formal witness list;
3. The Governor has provided a clear briefing schedule.. In the future, it will be far more logical and efficient if you file a motions and briefs with a series of points that we will attempt to address. We will do the same and, in the future not respond to these letter that raise random points in a very disorganized fashion.

In the meantime, we are not providing anything, beyond the reams of documents already sent to you yesterday. We trust that we can move forward in a more efficient and productive manner.

Sincerely,

/S/

William Goodman
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