



KWAME M. KILPATRICK, MAYOR
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July 30, 2008

Mr. Kelly Keenan Esq.
Legal Counsel to the Governor
The Honorable Jennifer M. Granholm
George W. Romney Bldg
111 South Capitol Avenue
Lansing, Michigan 48909

Re: Proceedings before the Honorable Jennifer M. Granholm pursuant to MCL 168.327

Motion for Extension of Time

Dear Mr. Keenan,

Pursuant to our previous discussion, I am forwarding to you our formal request for an adjournment or extension of time with regard to your acceleration of the proceedings before the Governor relative to the request of the Detroit City Council to remove from office, Mayor Kwame M. Kilpatrick.



As you will recall, the Mayor's office recently was closed for two weeks due to a fire in the Coleman A. Young Municipal Center Building and we were unable to retrieve any of the documents needed to prepare the pleadings that are required to be filed this week. As I was scheduled to be out of the city during the week of July 19-27, Mr. Jim Thomas, my co-counsel in this matter, was to have filed a Motion to extend the time for the filing of our motions and briefs on the legal issues. You will recall that I discussed the need for the extension with you during the time that I was locked out of my office.

As you may be aware, Mr. Thomas is counsel on numerous cases that concern the allegations raised by the City Council here. He also represents Mayor Kilpatrick in the matter brought by Prosecutor Worthy. Due to the demands of those cases, he was not able to prepare the drafts. Given the extraordinary circumstances, it is my hope that you will allow us some additional time to prepare the necessary pleadings. As General Counsel, my responsibilities include supervision of two departments: Workforce and Human Rights. The demands of those two departments and numerous other responsibilities make it very difficult to schedule time for preparation and attendance at the hearing before the Governor, if one should be required.

I have been in touch with the Detroit City Council's attorney, Bill Goodman. He is not in town at this time but I am told that he will call me today. I am attempting to secure his consent to this adjournment. With regard to the extension, we are requesting a minimum of 60 days. Mr. Thomas is not available until after the preliminary hearing in the Prosecutor's case.

I think it is important for all of us to submit cogent, yet brief, pleadings that will not require an inordinate amount of the time of your Office to review. That would allow for a more expeditious response from the Governor and, in my view, that is a worthy



objective. This extension will allow Mr. Thomas and I to confer and will result in a more targeted response.

Mr. Thomas is awaiting my call: If at all possible, I would appreciate a response to this letter and Motion today. I may be reached at 313-300-6084 and 313-670-3165.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "Sharon McPhail". The signature is written in a cursive, flowing style.

Sharon McPhail