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June 11, 2008

BY FAX AND REGULAR MAIL

Kelly G. Keenan, Esq.
Legal Counsel to the Governor
111 S. Capitol Ave,
Lansing, MI 48909

**Re; Petition and Charges against the
Honorable Kwame M. Kilpatrick**

Dear Mr. Keenan,

I write, on behalf of my client, in response to your letter, dated June 3, 2008. In that letter, you call for comments and suggestions. This letter, then, is written in that constructive spirit.

First, we have no objection to the general ground rules and procedures outlined. Nor do we see the need to file any preliminary motions. Further, while we have no objection to the *ex parte* contacts you have suggested, we would like to be advised when they take place. We would also ask that, if such contacts are made with the Mayor, experts, witnesses or other public officials, we be advised that such contact has occurred and who was present.

In addition, we are very interested in seeing the process move forward as soon as possible. From the little we can glean as to the possible arguments and positions that the Mayor may put forward, it appears (from, among other things, a rambling and somewhat incoherent "veto" message recently submitted to the Council by the Mayor) that he may attempt to argue that the allegations of official misconduct contained in Council's petition do not or cannot constitute a sufficient basis for removal under MCL 168.327.

Given our concern that these matter move forward expeditiously, we are prepared to file a brief that addresses that issue, immediately and proactively. Alternatively, we can also await papers filed by the Mayor, if this happens promptly, i.e. in response to an expedited motion schedule set by your office, on behalf of the Governor. If the Mayor's motions and other papers are, indeed, in place we can hold off and respond with greater precision to whatever defenses and arguments he presents. Once briefs and motions are served, we are prepared to go into a hearing immediately.

Finally, going back to my original point, I again underscore the importance of an expedited process, because of the urgency posed by the crisis that faces the City of Detroit and the need for immediate relief. We look forward to your guidance as to these concerns.

Sincerely,

William Goodman
Special Counsel, Detroit City Council



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cc: Sharon McPhail, Esq.; James Thomas, Esq., Members of Council