

From: Cohan, Josh
To: [AG-PFASProposal](#)
Subject: RE: PFAS Litigation - Bidder Proposal
Date: Wednesday, June 5, 2019 5:01:41 PM
Attachments: [image001.png](#)
[Michigan PFAS Litigation - Anapol Weiss Bidder Proposal.pdf](#)

To Whom it May Conern,

Attached please find Anapol Weiss' bidder application for the Michigan PFAS Manufacturer Tort Litigation. Please do not hesitate to reach out if you need more information.

Thank You,

Josh

AWSignature_cohan_j





MICHIGAN PFAS MANUFACTURER TORT LITIGATION: BIDDER PROPOSAL

ANAPOL WEISS

Lawrence R. Cohan, Esq.

Joshua C. Cohan, Esq.

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ANAPOLWEISS

PFAS Manufacturer Tort Litigation – Bidder Proposal

1.1 Identify the bidder’s contact person for the RFP process. Include name, title, address, email, and phone number.

Response: Joshua C. Cohan, Esquire; Associate Attorney – Anapol Weiss; 130 N. 18th Street, Suite 1600, Philadelphia, PA 19103; jcohan@anapolweiss.com; 215-790-4575

1.2 Identify the person authorized to sign a contract resulting from this RFP. Include name, title, address, email, and phone number.

Response: Lawrence R. Cohan, Esquire; Shareholder – Anapol Weiss; 130 N. 18th Street, Suite 1600, Philadelphia, PA 19103; lcohan@anapolweiss.com; 215-790-4567

2.1 Identify the company’s legal business name, address, phone number, and website.

Response: Anapol Weiss; 130 N. 18th Street, Suite 1600, Philadelphia, PA 19103; 215-735-1130; www.anapolweiss.com

2.2 Identify the State your business is organized in.

Response: Pennsylvania

2.3 Identify the location (city and state) that would have primary responsibility for this work if awarded a contract.

Response: Philadelphia, Pennsylvania

2.4 Identify the practice group area, if applicable, proposed to handle the work.

Response: Anapol Weiss’ Environmental and Toxic Tort practice group led by Lawrence R. Cohan, Esq.

2.5 Explain any partnerships and strategic relationships you have that would bring significant value to the State.

Response: I have received an appointment to the Plaintiff’s Steering Committee for MDL 2873 In Re: Aqueous Film-Forming Foam Product Liability Litigation. I have also been appointed as co-lead counsel to the committee representing water providers nationwide. I have also received appointments to the Personal Injury Committee and the ESI Committee (through our water contamination team member, Joshua Cohan, Esquire).

The Water Contamination MDL Litigation has now been ongoing for several months, and we have appeared before Judge Gergel each month since the MDL’s inception. The Judge has issued multiple Case Management Orders, and we are planning a “Science Day” to present both sides view of the science and medicine relating to PFOA contaminants.

Specifically, here in Pennsylvania, we have been retained to represent the interests of the Warminster Water Authority, the Warrington Water Counsel, and the Horsham Water Authority. These three entities supply water for over one hundred thousand customers which has been contaminated and rendered non-drinkable. They have spent tens of millions of dollars to develop remediation programs and to bring water in from remote locations for local residents.

We also represent dozens of individuals that have developed varying forms of cancer and other conditions (kidney cancer, testicular cancer, ulcerative colitis, thyroid disease, pregnancy-induced hypertension), from exposure to the AFFF products. We have met with and interviewed many witnesses involved in both obtaining the foam, spraying the foam, and addressing the issues of contamination at the military base sites in Pennsylvania which produced the contamination which is the subject of the litigation.

We have retained numerous experts, and anticipate retaining additional experts in all of the relevant fields, and developing the relevant science and medicine as the MDL progresses. We will be intimately involved in every aspect of the discovery and litigation, ultimately culminating in bellwether trials and/or cases being remanded to home jurisdictions for trial.

We continue to speak with and meet with other water authorities and individuals in connection with potential water contamination claims. We have had conversations and are interested in representing public entities in connection with possible natural resources claims and remain available to discuss the issues associated with such claims at any time.

2.6 If you intend to use subcontractors to perform the work, disclose: (1) the subcontractor's legal business name, website, address, phone number, and primary contact person; (2) a description of subcontractor's organization; (3) a complete description of the services or products it will provide; (4) information concerning subcontractor's ability to provide the services; (5) whether the bidder has a previous working experience with the subcontractor, and if yes, provide details of that previous relationship.

Response: We do not intend to use any subcontractors to perform the work.

2.7 Identify the name and title of the individuals you propose as key personnel. Attach resumes or CVs for each person.

Response: Lawrence R. Cohan, Esq. and Joshua C. Cohan Esq. (see attached Bios). We have a team of attorneys that are available to assist with in addition to the two attorneys listed above.

3.1 Describe at least 3 relevant experiences supporting your ability to successfully perform the work set forth in the SOW. Include a description of services provided and results obtained. Include contact information for the clients you represented.

Response:

1. Lawrence R. Cohan, Esq. is a member of the national steering committee for the AFFF water contamination MDL based in Charleston, SC. Co-lead counsel for the water providers committee in connection with the MDL. Clients include water authorities and individuals experiencing damages from the PFAS water contamination. Reference: Warminster Water Authority – Robert Nemeroff, Esq- Counsel for the authority.
2. Lawrence R. Cohan was co-lead counsel in the national human tissue MDL representing victims across the country in an MDL based in the Northern District of New Jersey Federal Court. That

litigation spanned five (5) years and involved depositions across the country, including, extensive briefing, appellate work, and ultimate resolution. Reference: 100s of individuals represented in connection with that litigation. Names can be provided on a confidential basis.

3. Lawrence R. Cohan represented class of individuals against Rohm and Haas for ground water contamination from the unlawful disposal of chemicals from the Rohm and Haas facility. Case was successfully resolved on behalf of the affected individuals. Reference: Robert Ewing (client confidential contact information can be provided upon request).
4. Lawrence R. Cohan has extensive experience dealing with chemical and contaminant litigation (extensive description in attached biography and steering committee application attached hereto). Including exposures to benzene, asbestos, PCBs, BF3s, and many other chemicals. Reference: Recently resolved Benzene litigation on behalf of Gene Nelson (client confidential contact information can be provided upon request).

3.2 Provide publicly available motions, briefs, and other documents relevant to your experience in providing the legal services sought under this RFP.

Response: See attached

4.1 Provide detailed information regarding any prior, current, or anticipated future relationship with any manufacturer of PFAS or PFAS- containing products that could give rise to potential actual or apparent conflict of interest. Disclose such information for both the bidder and any proposed subcontractors.

Response: We have no prior, current, or anticipated future relationship with any manufacturer of PFAS or PFAS-containing products.

4.2 Disclose any actual, apparent, or potential conflict of interest between the bidder and the State of Michigan.

Response: We have no actual, apparent, or potential conflicts with the State of Michigan.

4.3 With respect to any information provided in response to the questions above, provide an explanation of why an actual, apparent, or potential conflict of interest would not arise, or the measures that would be taken to avoid such a conflict.

Response: We do not believe any potential conflicts exist.

5.1 Bidder must affirm agreement with the terms of the SAAG Contract (Attachment A). If you do not agree, you must provide redline edits to the SAAG Contract with your proposal, and include justification for requesting deviation from the terms.

Response: We affirm our agreement with the terms of the SAAG contract.

6.1 Bidder must submit a proposed Fee Agreement which: (1) aligns with the SAAG Contract (Attachment A) and (2) clearly sets forth how the bidder proposes to address payment in the event of recovery. See also SAAG Contract (Attachment A), Section 3, Compensation and Cost Reimbursement.

Response: See attached proposed fee agreement.

LAWRENCE R. COHAN, ESQUIRE

Lawrence Cohan is a shareholder and senior trial counsel at Anapol Weiss and chairs the firm's Toxic Tort and Environmental Litigation Department.

Mr. Cohan's practice involves toxic torts and chemical exposure cases. These include Asbestos, Benzene, Lead, "Roundup", BF3, PFOAs, other chemicals and other dangerous products. He has also represented victims of pharmaceutical and medical device products, and has litigated complex class action, FELA and other personal injury matters.

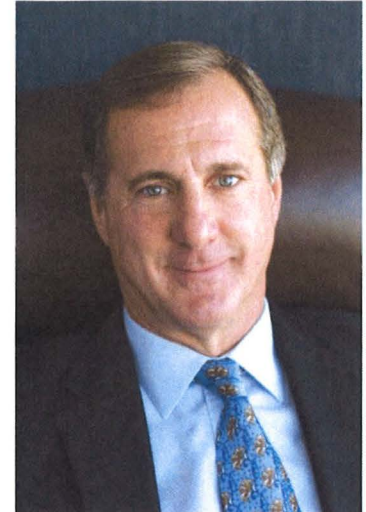
LEADERSHIP ROLES

As a leader in many complex cases, Larry has forged new law in the trial and appellate court levels in Pennsylvania, New Jersey and Washington, D.C. Larry clerked early in his career for the Honorable Harry A. Takiff, helping the Court create the first asbestos mass tort program in the country in 1979. A few years later, he was lead plaintiff's counsel when he worked with the Honorable George Kelton to create a similar program in Bucks County. Larry is presently on the steering committee in the Federal Court PFOA Water Contamination MDL (multi-district litigation), and is co-chair of the water provider litigation committee. Larry was Plaintiffs' Lead Counsel for the multidistrict litigation (MDL) on the infamous "human tissue" scandal case. He now serves on the Plaintiffs' Steering Committee for the Morcellator MDL in Kansas City, Kansas.

Larry has served for decades on boards of the Philadelphia and Pennsylvania Trial Lawyers Associations. He just completed his term as president of the Philadelphia Trial Lawyers Association, the oldest and largest local trial lawyer association in the country.

Mr. Cohan has represented literally thousands of steelworkers, many who worked at USX in Bucks County, Pennsylvania for claims arising out of their lung disease, including mesothelioma, caused by exposure to asbestos. He also regularly represents victims of exposure to benzene, many of whom worked at local refineries, who are suffering from various forms of leukemia. Mr. Cohan has handled toxic tort and environmental claims against major chemical producers, including Rohm and Haas, Honeywell and Dupont. Larry represents many individuals suffering from variants of Non-Hodgins Lymphoma caused by their exposure to Monsanto's Roundup weed killer.

Mr. Cohan served as Lead Counsel in the first and only "market share" lead poisoning case filed in Pennsylvania against the lead pigment industry. Larry is presently representing victims of a recalled robotic surgical device and the potentially deadly uterine morcellators.



Larry has obtained multimillion-dollar jury verdicts in toxic tort and other cases in Pennsylvania and New Jersey. He obtained the first plaintiff's verdict in an asbestos case in Bucks County, Pennsylvania, with the first verdict of its kind against asbestos "friction" product defendants GE, GTE and Eaton Cutler-Hammer Corporation. Recently, Larry obtained a \$7.4 million jury verdict in a groundbreaking mesothelioma case. He also recently testified before the Pennsylvania State House against proposed asbestos legislation which would have denied victims rights.

Mr. Cohan represents victims suffering from rare vaccine injuries before the United States Court of Appeals in Washington, D.C. as part of the National Vaccine Injury Compensation Program, and serves on the Board of the Vaccine Injured Petitioners Bar Association. He has also lobbied with the Pennsylvania legislature on behalf of children injured by lead poisoning.

PROFESSIONAL RECOGNITION

Mr. Cohan is a Certified Trial Advocate with the National Board of Trial Advocacy (NBTA), which promotes excellence in legal advocacy as the first American Bar Association-accredited attorney board-certifying agency in the world. Larry is a New Jersey Certified Civil Trial Attorney. The New Jersey Supreme Court designates certified civil trial attorneys, a rare designation to only a few lawyers based upon documented experience litigating and trying complex civil cases before a jury.

Larry has now been recognized by Pennsylvania Super Lawyers as among the "Top 10" in the state for two consecutive years, 2016 and 2017. He was also named among the Top 100 Lawyers in Pennsylvania numerous times and has been included in both New Jersey and Pennsylvania Super Lawyers® publications every year since 2004.

EDUCATION AND BACKGROUND

Larry received his law degree from the University of Pennsylvania Law School in 1979, where he served for two years as President of the Law School Environmental Law Group. He graduated Summa Cum Laude with a B.S. from Boston University in 1976. Larry also completed an internship with the Disciplinary Board of the Supreme Court of Pennsylvania. Upon graduation, he served in a two-year judicial clerkship with the Philadelphia County Trial Court's Honorable Harry A. Takiff, who founded the asbestos litigation mass tort program.

LECTURES AND PUBLICATIONS

Larry frequently writes and lectures about toxic torts, chemical exposure cases, medical malpractice, pharmaceutical and product liability, on both local and national levels. He has lectured for many bar and trial lawyer associations, frequently serving as Chair of those conferences.



JOSHUA COHAN, ESQ.

Associate

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CONTACT

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Joshua C. Cohan is an associate at Anapol Weiss and is a member of the firm's Mass Tort team and Environmental and Toxic Tort team. His practice focuses on environmental and toxic torts as well as pharmaceutical and medical device mass tort litigation. Joshua also handles medical malpractice, auto liability, and other catastrophic injury cases.

Joshua represents clients in mass torts and class action cases that have been catastrophically injured after being exposed to contaminants in the environment and after using dangerous pharmaceutical drugs, medical devices, and other products. Joshua is currently representing individuals and government entities in the water contamination mass tort *In Re: Aqueous Film-Forming Foams Products Liability Litigation*, in which he serves on the public water provider and ESI leadership committees. Joshua has obtained successful results for his clients in *In re: Testosterone Replacement Therapy Products Liability Litigation* and has also successfully represented former NFL players in *In Re: NFL Concussion Litigation*.

In addition to the successful resolution of mass tort and class action cases, Joshua has successfully represented injured victims in a variety of personal injury matters, including, motor vehicle accidents, medical malpractice, premises liability, products liability, and asbestos exposure cases.

In 2010, Joshua earned his Bachelor of Business Administration with a concentration in Finance, magna cum laude, from The George Washington University. In 2013, he received his Juris Doctor degree from The Villanova University School of Law, where he excelled in legal research and writing as well as oral advocacy. He was a member of the Villanova Law Moot Court Team and was a quarterfinalist in the 52nd annual Honorable Theodore L. Reimel Moot Court Competition as well as a National Quarter Finalist in the 2012 National Entertainment Law Moot Court Competition where he was also awarded high honors for his competition brief.

While in law school, Joshua served as a judicial clerk to the Honorable Thomas P. Rogers of the Montgomery County Court of Common Pleas and as a law clerk at Anapol Weiss.

Joshua is a regular contributor to the *Legal Intelligencer*, having written articles on Medicaid Liens, Judicial Retirement Age Limits, Generic Drugs, and on the emerging Water Contamination Crisis. Joshua is also a contributing author to the 5th edition of the *Library of Pennsylvania Personal Injury Forms* and will be a contributing author to the upcoming edition of *Pennsylvania Causes of Action*.

Joshua was recently named one of the best Mass Tort Lawyers in Pennsylvania in the 2019 edition of the *Best Lawyers* publication.

Joshua is a member of the Philadelphia Trial Lawyers Association, where he has served on the Future Leaders Committee, and the American Association for Justice. Joshua is licensed to practice law in Pennsylvania and New Jersey.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: Aqueous Film-Forming Foams
Products Liability Litigation

MDL Docket No. 2873
Hon. Richard M. Gergel

This document relates to: *All Actions*

**APPLICATION OF LAWRENCE R. COHAN FOR APPOINTMENT
TO PLAINTIFFS' STEERING COMMITTEE**

This Application is in support of my proposed appointment to the Plaintiffs' Steering Committee ("PSC") for Multi-District Litigation ("MDL") No. 2873. It would be my honor to serve and represent the common interests of Plaintiffs in this MDL if appointed by this Honorable Court. My firm and I have the requisite commitment, experience and resources to make a strong contribution to this MDL. As such, I respectfully submit this Application with the consent and agreement of other interested counsel comprising the proposed PSC to serve in a leadership role on the Plaintiffs' Steering Committee in these MDL proceedings.

1. I, Lawrence R. Cohan, am a senior partner and shareholder with the law firm of Anapol Weiss with offices in Philadelphia, PA, Cherry Hill, NJ, and Scottsdale, AZ. I am a member in good standing and licensed to practice law in Pennsylvania, New Jersey, Washington, D.C. as well as the District Courts of Pennsylvania, New Jersey and the 3rd Circuit.

2. I received a degree in Business Administration from Boston University in 1976 and my law degree in 1979 from the University of Pennsylvania Law School. I have been an active member of the Pennsylvania Bar since 1979, and the New Jersey Bar since 1989.

3. I am currently the chair of my law firm's Toxic Tort and Environmental Litigation Department and am managing numerous mass torts. My practice involves toxic torts and chemical exposure cases, including Asbestos, Benzene, Lead, "Roundup", BF3, PFOA/PFOS, other chemicals and other dangerous products, as well as medical malpractice, pharmaceutical and medical device liability, class action, FELA, and other complex personal injury matters. I have been representing Plaintiffs for nearly forty (40) years.

4. My law firm has been involved in complex mass tort, medical device, pharmaceutical, toxic tort, and environmental litigation nationwide for more than three decades. Members of my firm, myself included, have held various leadership roles on multiple state coordinated and MDL PSC's, including some as lead or co-lead counsel in the following cases: Fen-Phen, Rezulin, Propulsid, Baycol, PPA, Avandia, Trasyolol, Ephedra, Human Tissue, Fosamax, Kugel Mesh, Hydroxycut, Yaz, Medtronic and Guidant Heart Devices, Zimmer NexGen Knee, Biomet Hip, DePuy Knee, Pinnacle Hip, Pelvic Mesh, Testosterone, PPI, and the NFL Concussion Litigation. My firm has been recognized multiple times by US News and World Reports as one of the country's top Mass Tort Law Firms

5. I have been recognized by Pennsylvania Super Lawyers as among the "Top 10" in the state for two consecutive years, 2016 and 2017. I have also been named among the Top 100 Lawyers in Pennsylvania numerous times and have been included in both New Jersey and Pennsylvania Super Lawyers® publications every year since 2004.

6. With respect to leadership responsibilities outside of my firm, I am a past President of the Philadelphia Trial Lawyers Association. I have served many years on the Board of Directors of the Philadelphia Trial Lawyers Association and Pennsylvania Association for Justice. I am a long-standing member of the American Association for Justice and have chaired or co-chaired many litigation groups including Human Tissue, Vaccine and Alloderm.

7. I personally have been actively involved in numerous mass tort cases. I was co-lead counsel in *In Re: Human Tissue Products Liability Litigation* (D. New Jersey, MDL No. 1763) and have served on the PSC in *In Re Ethicon, Inc., Power Morcellator Products Liability Litigation* (D. Kansas, MDL No. 2652). I have also been involved in the Intuitive Robotic Da Vinci Device Litigation, the Propulsid Litigation, the Alloderm Human Tissue Patch Litigation, the PPA Litigation, Vaccine Litigation before the Federal Claims Court, Roundup Litigation, Guidant Heart Device Litigation, and Asbestos Litigation in multiple jurisdictions. I have taken depositions of general causation experts and have worked on all aspects of these cases.

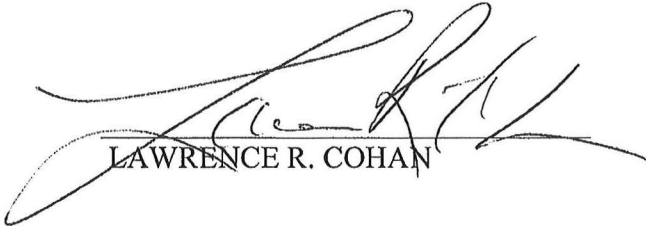
8. I am prepared to take on the responsibility of leadership, recognizing my obligation to my clients, litigants and the Court. I have been working on Aqueous Film-Forming Foam ("AFFF") cases for over two years and am intimately familiar with the relevant medical and scientific issues. I am counsel of record in *Gillen v. 3M et al* (2:18-cv-02037) and *Voelker v. 3M et al* (2:18-cv-02038), both originally filed in the Montgomery County Court of Common Pleas, removed to the District of Eastern Pennsylvania, and ultimately transferred to the MDL by the JPML in its Order assigning the MDL to this Court. In addition, I am counsel of record in numerous other AFFF cases, including an AFFF class action (co-lead counsel), over forty (40) individual AFFF product liability actions, and three (3) AFFF actions on behalf of water providers that have been or will be transferred to this MDL.

9. Since the Defendants in this action moved for transfer and consolidation, I have been working with other Plaintiffs' counsel handling AFFF cases on the next steps to ensure the litigation moves forward expeditiously, efficiently and effectively.

10. In addition to my personal commitment to take on the responsibilities of leadership, my law firm is fully committed to provide the necessary time and economic resources needed for such a role.

11. Throughout my career working in mass torts, I have been able to successfully work with courts and other attorneys throughout this country and have become extremely familiar with the duties and responsibilities of Plaintiffs' counsel in complex litigation. Further, I have worked collaboratively in the past with many of the attorneys that are seeking leadership in this MDL.

12. I respectfully submit that I have the necessary skill, experience, commitment, resources, and qualifications to serve on the Plaintiffs' Steering Committee in this litigation and to address the interests of all participants in these MDL proceedings.



LAWRENCE R. COHAN

Dated: December 17, 2018

ANAPOLWEISS

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(215) 875-7702 Direct Fax

June 5, 2019

AAG Polly Synk
synkp@michigan.gov
State of Michigan
Attorney General's Office

Re: PFAS Manufacturer Tort Litigation

Dear Ms. Synk:

This letter of engagement shall set forth the proposed terms of Anapol Weiss' (the "Law Firm") compensation for professional services in connection with issues involving PFAS contamination in the State of Michigan.

1. The Attorney General for the State of Michigan ("AG") agrees to retain the Law Firm to advise and represent the AG as a Special Assistant Attorneys General ("SAAG") with respect to all actions or interests that the AG has, or may have, against manufacturers of perfluorooctane sulfonate ("PFOS"), perfluorooctanoic acid ("PFOA"), and/or other perfluorinated compounds ("PFCs") in the state of Michigan.
2. The Law Firm agrees to take all reasonable and necessary steps to pursue reimbursement and other damages on account of wrongful conduct set forth above. The AG agrees to pay the Law Firm a contingency fee in accordance with the following:

(a) "Recovery" is defined as the gross amount of any settlement amounts, payments, credits, costs, expenses or fees, and expenses and costs, or other tangible benefits that the AG accepts in lieu of monetary payments, that derive from this Agreement, and which are actually collected by the AG, whether such Recovery is obtained through settlement, arbitration, mediation, litigation or otherwise. "Net Recovery" is defined as any settlement amounts, payments, credits, costs, expenses or fees, and expenses and costs, or other tangible benefits that the AG accepts in lieu of monetary payments, that derive from this



Agreement, and which are actually collected by the AG, whether such Recovery is obtained through settlement, arbitration, mediation, litigation or otherwise after expenses, costs and fees are deducted from the total recovery amount as provided in paragraph (b).

(b) The Law Firm shall be entitled to a contingency fee of 27% of the Net Recovery received by the AG.

(c) Any co-counsel which the Law Firm chooses to work with in connection with this case shall share in the aforesaid contingency fee at an amount and/or percentage to be separately agreed upon by the Law Firm and said co-counsel, and their involvement shall not otherwise alter the fee structure as set forth herein.

3. The AG and the Law Firm agree to cooperate fully in the investigation and prosecution of this Project, including, but not limited to, locating witnesses, reviewing documents, investigating claims and defenses, giving depositions, submitting documents in discovery and all other matters which it may be necessary or appropriate for the Law Firm to do in connection with the representation.
4. The Law Firm will coordinate and direct all non-AG personnel and experts working on the case, provided that the Law Firm agrees to inform the AG of any significant actions with respect to the case. The Law Firm agrees to provide the AG with copies of correspondence with other parties in the case.
5. The Law Firm is bound by the confidentiality and non-disclosure of all communications with, and documents provided by, the AG, and the AG's other consultants, attorneys, representatives and contractors. The Law Firm acknowledges that all documents or data of any type created by the Law Firm or their consultants during this engagement are the property of the AG, as holder of all applicable privileges. Accordingly, the Law Firm agrees, subject to applicable law or court order, not to disclose any communications with the AG or any of the information the Law Firm receives or develops in the course of its work, to anyone without the AG's consent.
6. The Law Firm agrees that all documents (including copies) provided to the Law Firm in connection with this engagement must be returned to the AG at completion of work pursuant to this engagement or upon termination of this Agreement. Additionally, the Law Firm agrees that:
 - (a) If access to or disclosure of any of the materials in the Law Firm's possession relating to this engagement is sought by a third party, the Law Firm must promptly notify the AG of any such action and must cooperate with the AG concerning the response to it, prior to any disclosures.

(b) The Law Firm must retain all documents or other materials generated by the Law Firm pursuant to this engagement, including its working papers, if any, relating to this engagement, and must keep all such documents and other materials confidential. This confidentiality requirement is a continuing obligation that survives the termination or expiration of this engagement. Upon the AG's request, the Law Firm will provide, without charge, an index of all documents retained pursuant to this engagement. The Law Firm will not destroy or cause to be destroyed any of the documents obtained or generated pursuant to this engagement without prior written authorization by the AG.

7. The AG is retaining the Law Firm for the purpose of obtaining legal advice. The Law Firm's services will be undertaken in anticipation of litigation, and, to the extent allowed by law, will be confidential and subject to the protection of the attorney-client privilege and the work product doctrine. The AG and the Law Firm further anticipate that they will disclose certain confidential and proprietary information to each other in the course of this engagement. To the extent allowed by law, the parties mutually agree not to disclose such information to anyone other than the persons working on this specific Project.

If the foregoing is acceptable, please execute where indicated below. This Agreement shall be effective upon execution by both parties.

Very truly yours,

Lawrence R. Cohan
Anapol Weiss

AGREED:

ATTORNEY GENERAL FOR THE STATE OF MICHIGAN

DAN NESSEL
Attorney General

Date: _____