



2723 South State Street, Suite 150
Ann Arbor MI 48104
(866) 534 6177
LawCompany.com

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF [REDACTED]**

[REDACTED]

Plaintiff/Counter-Defendant,

Case No. [REDACTED]

V.

HON. [REDACTED]

[REDACTED]

Defendants/Counter-Plaintiffs.

[REDACTED]
Attorney for Plaintiff/Counter Defendant
[REDACTED], Suite [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
Attorney for Defendants/Counter Plaintiffs
[REDACTED]
[REDACTED]
[REDACTED]

**PLAINTIFF/COUNTER-DEFENDANT [REDACTED]'S FIRST SET OF
REQUESTS FOR PRODUCTION TO DEFENDANTS/COUNTER-PLAINTIFFS**

NOW COMES, Plaintiff/Counter-Defendant, [REDACTED], through his Attorney [REDACTED], of [REDACTED], submits his Requests for Production to Defendants/Counter- Plaintiffs, [REDACTED] pursuant to Michigan Court Rule 2.310 (C). Defendants/Counter-Plaintiffs are required to prepare and serve answers separately and fully in writing under oath within twenty-eight (28) days from the date that these requests are served



to Plaintiff/Counter-Defendant's attorney's office, [REDACTED]
Suite [REDACTED]

In furnishing answers and any supplemental answers to the following requests, include all information that is relevant to the subject matter involved in this action and that is available to the agents, representatives, employees, attorneys, independent contractors or any person or entity acting on Defendants/Counter- Plaintiffs' behalf. These requests are continuing, and Defendants/Counter- Plaintiffs have a duty to reasonable supplement its answers.

INSTRUCTIONS

1. These Requests for Production of Documents are to be read, interpreted and answered in accordance with these instructions and the definitions that are set forth hereinafter.
2. Identify each person who assisted or participated in preparing and/or supplying any of the information given in answer to, or relied upon in preparing answers to these Request for Production of Documents.
3. When any Request for Production of Documents, or your answer thereto, refers to any writing, give: (i) its date; (ii) the author or addressor; (iii) the addresses; (iv) the recipients of all copies; (v) the present location of the original and all copies, if any; and (vi) (a) the identity of the person presently in custody, control or possession of the original and each copy, if any; (b) a detailed summary of the contents thereof, in lieu of such summary, attach a copy thereof to your answers to these request for production of documents, identifying it in your answer.
4. You are required to produce all documents which are in your actual or constructive possession, custody, or control, including documents which may be in the physical possession of another entity such as a business or a law firm. If any document was, but

no longer is, in your possession, custody, or control, you will be required to state whether it (a) is lost, or destroyed, (b) has been transferred to another, either voluntarily or involuntarily, or (c) has been otherwise disposed of, and, in each instance, explain the circumstances surrounding the disposition, and state the date or approximate date thereof.

5. Whenever a document is not produced in full, you are directed to state with particularity the reason or reasons it is not produced in full and describe to the best of your knowledge, information and belief, and with as much particularity as possible, those portions of the document that are not produced.
6. When any Request for Production of Documents, or your answer thereto, refers to any communication, (1) Give – (i) its date and time; (ii) the communicants; (iii) all persons present during, or who witnessed, the communication; and (2) Give – (i) a detailed summary of the content thereof.
7. In responding to any and all request for production of documents contained herein, you are requested, in the event an objection is interposed on the basis of any privilege (e.g., the attorney-client privilege, work product, confidentiality or other grounds or excuse), to identify each document or draft thereof, as to which the objection of privilege is invoked in the following manner:
 - i) The reason for withholding;
 - ii) The portion of the demand, i.e., the request number or numbers to which the withheld document is responsive;
 - iii) Its nature (e.g., letter, memorandum, etc.);
 - iv) Its title, if any;
 - v) The date it was prepared;
 - vi) The identity of the individual(s) who prepared it or who participated in its preparation;
 - vii) The identity of the individual(s) to whom it was directed;



- viii) The identity and address of any and all individuals who received copies of it;
 - ix) The present location of the writing and the identity of the individual who has custody of it;
 - x) If the document no longer exists, the disposition of it; and
 - xi) A general statement concerning its subject matter.
8. The party responding to the request must produce the information in a form or forms in which the party ordinarily maintains it, or in a form or forms that is or are reasonably usable. A party producing electronically stored information need only produce the same information in one form.

DEFINITIONS

As used herein, the following terms shall have the meaning ascribed to them below. The definitions set out below are to be construed as broadly as possible to include the most information or Documents responsive to the Requests being propounded herein.

1. The terms “Defendants,” “Counter-Plaintiffs,” “You,” “Your,” as used herein, refer to [REDACTED], jointly, their attorney, or any person acting as their agent or otherwise on their behalf answering these Requests for Production.
2. The term “[REDACTED]” as used herein, refer to Defendant/Counter-Plaintiff, [REDACTED], his attorney, or any person acting as his agent or otherwise on his behalf.
3. The term “Plaintiff” or “[REDACTED]” as used herein, refer to Plaintiff/Counter Defendant [REDACTED] an individual.
4. The term “Property” as used herein, refer to the Property specifically described as The [REDACTED] ALSO the [REDACTED] of the adjacent vacated alley, [REDACTED], as recorded in [REDACTED], Page [REDACTED] of [REDACTED], [REDACTED] County Records that is

located at [REDACTED], [REDACTED], Michigan [REDACTED].

5. The terms “Document” and “Documents,” as used herein, include any writings, recordings, text messages, transcriptions, notes, or any other form of physical evidence. Specifically, the terms “Document” and “Documents,” as used herein include any matter or tangible thing containing or recording any handwriting, typewriting, printing, photographing, or any other means of recording on any tangible thing, any form of communication, including letters, texts, words, pictures, sounds, or symbols, or combinations thereof, and it further includes any oral communication later reduced to writing or confirmed by writing.
6. As used in these Requests, the term “Communication” and “Communications” means, and includes and encompasses, any and all transmission, sending, and/or receipt of information of any kind and by and/or through any means, whether face-to-face conversations or otherwise, including, but not limited to: speech, writings, text messages, language, computer electronics of any kind, photographs, symbols, signs, facsimile transmission, and/or other media of any kind, and any and all inquiries, discussions, conferences, conversations, negotiations, agreements, meetings, interviews, telephone conversations, letters correspondence, notes, email, memoranda, documents, writings, or other forms of communications, including but not limited to both oral and written communications.
7. The term “Identify” when used with respect to a person means the name of the person, the address of the person, and the person’s other identifying information, such as title and affiliation to any other person.
8. The term “Identify” when used with respect to a Document shall mean to provide the

following information:

- a. The date of the document;
 - b. The title of the document;
 - c. Identify the author of the document;
 - d. Identify each person that has custody of the document;
 - e. A brief description of the document.
9. The term “Person” or “Persons” includes a natural person, firm, association, organization, partnership, business, sole proprietorship, trust, limited liability company, corporation, or public entity.
10. The term “Possession” means any document in your possession, custody or control.
11. The term “Complaint” shall mean and refer to the complaint filed by Plaintiff as Case No. [REDACTED] titled [REDACTED] v. [REDACTED] filed before the [REDACTED] District Court, State of Michigan on [REDACTED] County, Third Judicial Circuit Court on [REDACTED]
12. The term “Counter-Complaint” shall mean and refer to the counter-complaint filed by Defendants in Case No. [REDACTED] titled as [REDACTED] v. [REDACTED] before the [REDACTED] County, Third Judicial Circuit Court on [REDACTED]
13. Terms not defined in these Requests for Production shall have their ordinary and usual meanings.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce all Documents identified in response to [REDACTED]'s first set of Interrogatories that was propounded upon Defendants herewith.



RESPONSE:

REQUEST FOR PRODUCTION NO. 2:

Please produce all Documents in Your possession to support Your contention that [REDACTED]
[REDACTED] as alleged in Your
Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3:

Please produce all Communications in Your possession to support Your contention that [REDACTED]
[REDACTED]
[REDACTED] as stated in
Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4:

Please produce all Documents in Your possession to support Your contention that [REDACTED]
[REDACTED]
[REDACTED] as alleged in Your
Counter-Complaint.

RESPONSE:



REQUEST FOR PRODUCTION NO. 5:

Please produce all Documents in Your possession to support Your contention [REDACTED] or his company [REDACTED] [REDACTED] [REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6:

Please produce all Documents in Your possession to support Your contention that [REDACTED] [REDACTED] [REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7:

Please produce all Documents in Your possession to support Your contention that [REDACTED] [REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8:



Please produce all Documents in Your possession to support Your contention [REDACTED]
[REDACTED]

alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9:

Please produce all Documents in Your possession to support Your contention that on [REDACTED]
[REDACTED] from You as alleged in

Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10:

Please produce all Documents and Communications in Your possession to support Your
contention that [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11:

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15:

Please produce any and all Documents and Communications in Your possession to support Your contention that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16:

Please produce any and all Documents and Communications in Your possession to support Your contention that You [REDACTED]

[REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17:



Please produce any and all Documents and Communications in Your possession to support Your contention that [REDACTED]

[REDACTED]” as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18:

Please produce any and all Documents and Communications in Your possession to support Your contention that [REDACTED]

to the Defendants as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19:

Please produce any and all Documents and Communications in Your possession to support Your contention that [REDACTED]

[REDACTED]

[REDACTED] as alleged in

Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 20:

Please produce any and all Documents and Communications in Your possession to support Your contention that [REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 21:

Please produce any and all Documents and Communications in Your possession to support Your contention that [REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 22:

Please produce any and all Documents in Your possession to support Your contention that

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 23:



Please produce any and all Documents in Your possession to support Your contention that [REDACTED]

[REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 24:

Please produce any and all Documents and Communications in Your possession to support Your contention that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED],” as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 25:

Please produce any and all Communications in Your possession where [REDACTED]

[REDACTED]

[REDACTED] as alleged

in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 26:

Please produce any and all Communications in Your possession to show that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 27:

Please produce any and all Communications in Your possession to show that [REDACTED]

[REDACTED] as alleged in Your

Counter-Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 28:

Please produce all Documents in Your possession reflecting [REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 29:

Please produce any and all Documents or Communications in Your possession to show that [REDACTED]
[REDACTED] by
You.

RESPONSE:

REQUEST FOR PRODUCTION NO. 30:

Please produce any and all Documents, including any draft agreements, in Your possession relating to [REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 31:

Please produce all Documents in Your possession reflecting [REDACTED]
[REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 32:

Please Identify all the Communications with [REDACTED] in Your possession referring [REDACTED]
[REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 33:

Please produce all Documents reflecting [REDACTED] in the business,

[REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 34:

Please Identify all Documents reflecting the [REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 35:

Please Identify all Documents reflecting the [REDACTED] received for [REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 36:

Please produce all Documents reflecting [REDACTED]

RESPONSE:

REQUEST FOR PRODUCTION NO. 37:

Please Identify any Document in Your possession to show that [REDACTED]

[REDACTED].

RESPONSE:

REQUEST FOR PRODUCTION NO. 38:

Please produce any Document to show that You [REDACTED]
[REDACTED]

RESPONSE:

Respectfully submitted,

[REDACTED]
Attorney for Plaintiff/Counter Defendant

Dated: [REDACTED], 2021

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF [REDACTED]

[REDACTED]

Plaintiff/Counter-Defendant,

Case No. [REDACTED]

V.

HON. [REDACTED]

[REDACTED]

Defendants/Counter-Plaintiffs.

[REDACTED]
Attorney for Plaintiff/Counter Defendant
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
Attorney for Defendants/Counter Plaintiffs
[REDACTED]
[REDACTED]
[REDACTED]

PROOF OF SERVICE

On [REDACTED], 2021, I served a copy of the foregoing Requests for Production in the above captioned matter by First Class Mail by enclosing the same in an envelope with sufficient postage to:

[REDACTED]
Attorney for Defendants/Counter [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dated: [REDACTED], 2021

[REDACTED]
Affiant