

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ERNEST FLAGG, as Next Friend of JONATHAN BOND,
a minor, TARIS JACKSON, as Next Friend of ASHLY
JACKSON, a minor; and DR. BRIAN GREENE,
as Next Friend of INDIA
BOND, a minor

Plaintiffs,

v

Case No.: 05-CV-74253
Hon. Gerald E. Rosen
Magistrate Judge R. Steven Whalen

CITY OF DETROIT, a municipal corporation;
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;
DEPUTY DETROIT POLICE CHIEF CARA BEST;
JOHN DOE POLICE OFFICERS 1-20; ASST.
DEPUTY POLICE CHIEF HAROLD CURETON;
COMMANDER CRAIG SCHWARTZ; POLICE LT.
BILLY JACKSON; MAYOR KWAME M. KILPATRICK,
CHRISTINE BEATTY, jointly and severally,

Defendants.

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DEFENDANT, CHRISTINE BEATTY'S, PRELIMINARY WITNESS LIST

NOW COMES Defendant, Christine Beatty (“Beatty”), by and through her attorneys, Morganroth & Morganroth, PLLC, and for her Preliminary Witness List states as follows:

1. Agents and Representatives of City of Detroit
Can be reached through counsel of record.
2. Former Mayor Kwame Kilpatrick
Can be reached through counsel of record.
3. Carlita Kilpatrick
Can be reached through counsel for former Mayor Kwame Kilpatrick
4. Former Detroit Police Chief Ella Bully-Cummings
Can be reached through counsel of record.
5. Former Deputy Detroit Police Chief Cara Best
Can be reached through counsel of record.
6. Asst. Deputy Police Chief Harold Cureton
Can be reached through counsel of record.
7. Former Commander Craig Schwartz
Can be reached through counsel of record.
8. Police Lt. Billy Jackson
Can be reached through counsel of record.
9. Assistant Chief Walter Shoulders
Can be reached through counsel for City of Detroit
10. Christine Beatty
Can be reached through counsel of record.
11. Harold Nelthrope

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Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

12. Gary Brown

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

13. Walter Harris

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

14. Sherece Fleming-Freeman

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

15. Jerry Oliver

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

16. Donald Parshall

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

17. Steven Dolunt

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18. Hugh Morrison

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19. Wendy R. Mullins

May be contacted through counsel for Velocita

20. Anthony Baker

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21. John Johnson

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22. Alvin Bowman

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

23. Marion Stevenson

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

24. Danny Marshall

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

25. Susan Smith

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26. Abdon Ruiz, Jr.

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27. Sherif Elalayli

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28. Jeff Jackson

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29. David Bransham

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30. Michael McGinnis

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

31. John Deitrick

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

32. Kellie Farrell

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

33. Yassar Zora

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34. John Baritchie

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information.

35. Shannon Bullock

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36. Thomas Smith

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37. William Niarhos

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

38. John Figurski

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

39. Douglas Bayer

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

40. Cebino Chapa

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41. Ronald Fleming

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42. David Rayford

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43. Brian D. Greene

Plaintiffs are already aware of such contact information.

44. Taris A. Jackson

Plaintiffs are already aware of such contact information.

45. Lorenzo Jones

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46. Mike Martin

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47. Christina L. Borowicz
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(248) 302-8897

48. Elwood S. Berry, Jr.
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49. Ernest Flagg

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50. Jonathan Bond

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51. Ashly Jackson

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Plaintiffs are already aware of such contact information.

52. India Bond

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53. Michael Cox
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54. Carl J. Schmidt
Wayne County Medical Examiner
1300 E. Warren
Detroit MI 48207
313-833-2504

55. Custodians of records of the following:

- a. City of Detroit Police Department
- b. Wayne County Medical Examiner's Office
- c. Wayne County Prosecutor's Office
- d. Wayne County Sheriff's Department
- e. Michigan State Police
- f. City of Detroit Fire Department
- g. City of Detroit Human Resources Department
- h. Michigan Department of Corrections
- i. Detroit Receiving Hospital
- j. St. John Riverview Hospital
- k. Michigan Attorney General's Office
- l. Velocita Wireless f/k/a Skytel Communications

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m. Sprint/Nextel f/ka Nextel Communications

56. Stephen Oshinsky

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57. Michael Stefani
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58. Samuel McCargo
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59. William Mitchell III
Mitchell Lawyers & Associates PLLC
2000 Town Ctr Ste 1000
Southfield, MI 48075
(248) 415-2230

60. Dadan Milton

Uncertain as to contact information and/or Plaintiffs are already aware of such contact information.

61. Darrett "Little D" King

62. Eric "Big E" Mitchell

63. Any and all witnesses listed by any other Defendant in his/her witness lists

64. Any and all witnesses listed by any Plaintiff in his witness lists

65. Any and all witnesses whose identity is established through subsequent discovery

66. All rebuttal witnesses

67. Beatty reserves the right to add additional witnesses as discovery progresses in this

action

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68. Beatty reserves the right to amend her witness list to correct any typographical, spelling, clerical, and identification errors which may be present and are later discovered.

Respectfully submitted,

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By: /s/ Mayer Morganroth
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Dated: October 17, 2008

CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2008, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Norman A. Yatooma, Attorney
Kenneth L. Lewis, Attorney
James C. Thomas, Attorney

John A. Schapka, Attorney
Krystal A. Crittendon, Attorney
Herschel P. Fink, Attorney

and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants:

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Dated: October 17, 2008

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