

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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

Plaintiffs,

-VS-

CASE. NO.: 05-CV-74253
HON.: GERALD E. ROSEN
MAG. R. STEVEN WHALEN

CITY OF DETROIT, a Municipal Corporation,
DETROIT CHIEF OF POLICE, ELLA BULLY-
CUMMINGS, DEPUTY DETROIT POLICE CHIEF,
CARA BEST, JOHN DOE OFFICERS 1-20, ASST.
DEPUTY POLICE CHIEF HAROLD CURETON,
COMMANDER CRAIG SCHWARTZ, MAYOR
KWAME KILPATRICK, CHRISTINE BEATTY,
Jointly and severally,

Defendants.

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DEFENDANT
ELLA BULLY-CUMMINGS
PRELIMINARY
WITNESS LIST

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DEFENDANT ELLA BULLY-CUMMINGS PRELIMINARY WITNESS LIST

NOW COMES Defendant, Ella Bully-Cummings, by and through her attorneys, Plunkett Cooney, and for her Preliminary Witness List states as follows:

1. Ernest Flagg
2. Jonathan Bond
3. Taris Jackson
4. Ashly Jackson
5. Dr. Brian Greene
6. India Bond
7. Family members of all individuals listed above in #1-6.
8. Any and all employees, past or present, from the City of Detroit, including but not limited to:
 - a. Records custodian
 - b. Ella Bully-Cummings
 - c. Kwame M. Kilpatrick

- d. Christine Beatty
 - e. Cara Best
 - f. Harold Cureton
 - g. Craig Schwartz
 - h. Billy Jackson
9. Custodian of Records of the following:
- a. City of Detroit Mayor Office;
 - b. City of Detroit Human Resources Department;
 - c. City of Detroit Police Department;
 - d. Wayne County Medical Examiner's Office;
 - e. Wayne County Prosecutor's Office;
 - f. Wayne County Sheriff's Department;
 - g. Michigan State Police;
 - h. Michigan Attorney General's Office;
 - i. Michigan Department of Corrections;
 - j. Detroit Receiving Hospital;
 - k. St. John Riverview Hospital;
 - l. Velocita Wireless f/k/a Skytel Communications;
 - m. Sprint/Nextel f/k/a Nextel Communications.
10. Any witnesses listed on any parties witness list filed in this matter.
11. All rebuttal witnesses.
12. Defendant Ella Bully-Cummings reserves the right to add witnesses as discovery progresses in this action.

13. Defendant Ella Bully-Cummings reserves the right to amend her witness list to correct any typographical, spelling, clerical, and identification error, which may be present and are later discovered.

PLUNKETT COONEY

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Dated: October 17, 2008

CERTIFICATE OF SERVICE

Randal M. Brown, attorney with the law firm of PLUNKETT COONEY, being first duly sworn, deposes and says that on the 17th day of October 2008, he caused a copy of this document to be served upon all parties of record, and that such service was made electronically upon each counsel of record so registered with the United States District Court and via U.S. Mail to any counsel not registered to receive electronic copies from the court, by enclosing same in a sealed envelope with first class postage fully prepaid, addressed to the above, and depositing said envelope and its contents in a receptacle for the US Mail.

PLUNKETT COONEY

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