

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

THOMAS D'ANGELO,

Plaintiff,

v.

PAUL PARENT, CLINTON TOWNSHIP,  
a municipal entity, NICHOLAS DYKAS,  
JASON FIGURSKI and KEITH WATSON,  
in their official and individual capacities,  
jointly and severally,

Defendants.

CASE NO. 2:10-cv-12195  
HONORABLE LAWRENCE P. ZATKOFF  
MAGISTRATE MONA E. MAJZOUB

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**LIST OF UNRESOLVED ISSUES**

Plaintiffs served discovery on Defendants in June. Only after this motion was filed did Defendants provide their unsigned answers to discovery.

Clinton Township has now apparently agreed to produce the following, including:  
**Req. 5:** Orders and training re. arrests, seizures and questioning of witnesses.  
**Defendant has agreed to produce these orders or policies regarding citizen complaints, use of force, and seizure/arrest policies subject to a protective order.**  
**Defendants' Position:** Subject to a protective order, Defendants will produce the orders and training re: arrests, seizures and questioning of witnesses.

**Plaintiff's Position:** A protective order should immediately be presented, and a specific date set for the production of these records.

**Req. 6:** Complaints, discipline and internal investigations into arrests, seizures and questioning.

**Defendants' Position:** Defendants object to this request as to relevance but in the interest of discovery Defendants will produce the requested documents subject to a protective order.

**Plaintiff's Position:** A protective order should immediately be presented, and a specific date set for the production of these records

**Req. 16:** Defendant officers personnel files.

**Defendants' Position:** Defendants will produce the personnel records subject to a protective order. it is Defendants' position that no personal information such as home address, telephone numbers, social security numbers, etc. will be provided.

**Plaintiff's Position:** A protective order should immediately be presented, and a specific date set for the production of these records

**Req. 12:** Complaints, and investigations related to complaints lodged against defendant officers.

**Defendants' Position:** Subject to a protective order the Defendants will provide copies of Complaints, investigations related to complaints lodged against Defendant officers.

**Plaintiff's Position:** A protective order should immediately be presented, and a specific date set for the production of these records

**Req. 13:** Investigations of any individual Defendant officer:

**Defendants' Position:** It is Defendant's position that this request is the same as Req. No. 12.

**Req. 18:** Lawsuits alleging violation of 14<sup>th</sup> and/or 4<sup>th</sup> Amendments

**Defendants' Position:** Lawsuits alleging violation of 14<sup>th</sup> and/or 4<sup>th</sup> Amendment claims are available through public records. However, in the interest of discovery, Defendants will provide a list of cases, if any, for the subject officers.

**Plaintiff's Position:** A protective order should immediately be presented, and a specific date set for the production of these records

**Req. 19:** Records related to insurance indemnity and assumption of liability

**Defendants' Position:** These Defendants object to the production of records related to insurance indemnity and assumption of liability. However, in the interest of discovery, Defendants will provide a copy of the insurance policy subject to a protective order.

**Plaintiff's Position:** A protective order should immediately be presented, and a specific date set for the production of these records

Thus, the only issue is the language of any protective order, when it shall be presented and when the discovery shall be produced.

/s/AMOS E. WILLIAMS  
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