

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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THOMAS E. KUHN (P37924)
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STIPULATED ORDER REGARDING DISCOVERY

The parties, by and through counsel, hereby agree to the following production of records pursuant to Plaintiff's 1st Discovery Request:

Req. 5: Orders and training re. arrests, seizures and questioning of witnesses.

Defendant will produce these orders or policies regarding citizen complaints, use of force, and seizure/arrest policies subject to a protective order.

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

**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.**

Req. 16: Defendant officer's personnel files.

Defendants will produce the personnel records subject to a protective order. No personal information such as home address, telephone numbers, social security numbers, etc. will be provided.

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

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

Req. 18: Lawsuits alleging violation of 14th and/or 4th Amendments

Lawsuits alleging violation of 14th and/or 4th 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.

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

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.

DEFENDANTS SHALL PROVIDE THE REQUESTED DISCOVERY BEFORE OR ON NOVEMBER 27, 2010.

IT IS SO ORDERED.

S/ MONA K. MAJZUB

MONA K. MAJZUB

UNITED STATES MAGISTRATE JUDGE

OBJECTION TO ENTRY WAIVED:

/S/ AMOS E. WILLIAMS

AMOS E. WILLIAMS (P39118)

THOMAS E. KUHN (P37924)

Attorneys for Plaintiff

/S/ PETER W. PEACOCK [WITH CONSENT]

PETER W. PEACOCK (P37201)

Attorneys for Defendants Clinton Township

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