

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

AMOS E. WILLIAMS (P39118)
THOMAS E. KUHN (P37924)
AMOS E. WILLIAMS, P.C.
Attorneys for Plaintiff
615 Griswold St., Suite 1115
Detroit, Michigan 48226
(313) 963-5222

PETER W. PEACOCK (P37201)
PLUNKETT COONEY
Attorneys for Defendants Clinton Township
Dykas, Figurski and Watson
10 S. Main Street, Suite 400
Mt. Clemens, Michigan 48043
(586) 466-7605

PLAINTIFF'S FIRST DISCOVERY REQUESTS TO DEFENDANTS

1. Please state the name, title and current address of each and every person who participated in the preparation of the answers to these interrogatories to Defendant and state which interrogatories they participated in answering.

RESPONSE:

2. Please produce all records, including but not limited to, all activity logs, car logs, day book entries, incident reports, attendance, pay for Defendants and anyone involved in investigating the incident for which Plaintiff was charged.

RESPONSE:

3. Please produce any and all records including but not limited to all reports, records, summaries, recaptulations concerning anyone involved in investigating the incident for which Plaintiff was charged.

RESPONSE:

4. Please produce a copy of any and all records, including but not limited to, affidavits, videos, audios, computer-generated records, statements and/or photos relating to Plaintiff.

RESPONSE:

5. Please produce a copy of any and all records, including but not limited to, all general orders, special orders, executive orders, training materials, standard

operating procedures or the like, which govern arrest, seizure and/or questioning of witnesses and/or suspects.

RESPONSE:

6. Please produce any and all records, including but not limited to, all complaints, misconduct reports, complaints, ombudsman investigations, internal investigations concerning arrest, seizure, and/or questioning of witnesses and/or suspects.

RESPONSE:

7. Please list the names, present addresses, places of employment, and job titles of each of the following persons:
 - a. All witnesses known to the Defendant(s) who saw Plaintiff at the time of the incident.
 - b. All persons who participated in the incident related to Plaintiff;
 - c. All witnesses who were present during any investigation of Plaintiff's incident.
 - d. All employees on duty and anyone involved in investigating the incident for which Plaintiff was charged..
 - e. The person who has and/or had custody of records requested in this request.

RESPONSE:

8. Please produce all records, including but not limited to all written reports, records, or other documents, photographs, audio tapes and video tapes, computer-generated files and/or records, including but not limited to phone logs, daily activity logs, and desk books if any, relating to the Plaintiff in the possession, custody, or control of Defendants

RESPONSE:

9. Does Defendant have a record of any incidents and/or misconduct of Plaintiff? If so, please produce them.

RESPONSE:

10. Was any type of investigation conducted into the propriety of any of the Defendants' or Defendants' agents' actions? If yes, please:
 - a. Identify all persons who conducted or participated in such investigation;
 - b. Produce a copy of all documents concerning such investigation or generated during the course of such investigation.
 - c. Identify the results of such investigation.

RESPONSE:

11. Have any of the Defendants or Defendants' agents involved in investigating the incident for which Plaintiff was charged, ever been named as a Defendant in any other lawsuit? If yes, please provide the following:
- a. The identities of all parties named as Plaintiffs and Defendants, and their respective attorneys;
 - b. The date each suit was filed, the case number, the court and the judge assigned to each case;
 - c. The substance of the allegations involved in each case;
 - d. The outcome of each case, e.g., settlement, jury trial, bench trial, etc., the date of the outcome, and the current status.

RESPONSE:

12. Please produce a copy of all complaints lodged against Defendants and/or Defendants' agents involved in investigating the incident for which Plaintiff was charged, including, but not limited to, all records concerning any investigation of each complaint and the disposition of each complaint.

RESPONSE:

13. For each person not previously identified whom Defendant believes may have knowledge or claims to have knowledge relevant to any allegation or claim in the complaint, please state:
- a. Their name;
 - b. Their current and last known home address;
 - c. Their current or last known employer's name and address;
 - d. The substance of their knowledge.

RESPONSE:

14. Please identify all expert witnesses Defendants will use and please state:
- a. His/her field of expertise;
 - b. His/her educational background;
 - c. With respect to any other lawsuit in which each witness has been a witness or consultant;
 - i. The name of the Court;
 - ii. The caption of the case;
 - iii. The date of its filing and name of the party for whom she/he testified or consulted;
 - iv. The name of the attorney representing any party;
 - v. The substance of his/her testimony.

- d. State the number of times the witness has been consulted by the lawyer and/or law firm for Defendants herein; and the number of times she/he has testified (by deposition or at trial) for said lawyer and/or law firm;
- e. Please state when Defendant or its attorney first made arrangements for him/her to appear as a witness on Defendant's behalf in this case;
- f. If the witness has or intends to consult or rely upon any text or journal, state the name, author (or editor), publisher, edition and precise portion of said text, including in the case of a journal the volume number and page and title of the article;
- g. If the witness has or intends to consult with any other person relative to the testimony to be offered by the witness at trial, state the name, address, phone number and specialty of said person;
- h. If the witness has rendered comments or an opinion to either Defendant or its attorneys, were the comments or opinion written or verbal;
- i. If the witness has rendered comments or an opinion to either Defendant and/or its attorneys, please state the substance of facts and opinions as to which she/he is expected to testify. Please do not state mere conclusions;
- j. Please give a summary of the grounds for each opinion which the witness is expected to testify;
- k. If the witness has prepare any letter, notes reports or written document relative to any opinion in this matter, attach a copy;
- l. Please produce a copy of each witness' curriculum vitae.

RESPONSE:

15. Please produce any and all documents which Defendants may use as exhibits at the time of trial.

RESPONSE:

16. Please provide a complete and legible copy of the entire police and/or personnel file, for all individually named Defendants.

RESPONSE:

17. Please provide a complete and legible copy of any investigation file involving individually named Defendants.

RESPONSE:

18. Please provide a complete and legible copy of all lawsuits alleging violation of Fourth or Fourteenth Amendment rights, from 1999 to present. Plaintiff will accept a compilation of such cases or Plaintiff will examine the records as kept in the ordinary course of business.

RESPONSE:

19. Please provide a complete and legible copy of the all records relating to the insurance, indemnity and/or assumption of liability, for Defendants involved in this case.

RESPONSE:

AMOS E. WILLIAMS, P.C.

By 

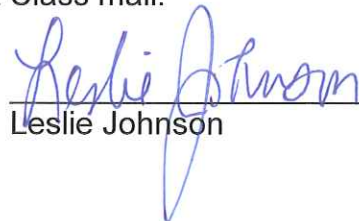
Amos E. Williams (P39815)
Thomas E. Kuhn (P 37924)
Attorneys for Plaintiff

Dated: June 30, 2010

C:\Documents and Settings\All Users\Documents\Office\FILED\AEW\Angelo\Discovery\1st Discovery 6-30-10 fed

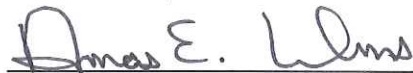
PROOF OF SERVICE

Leslie Johnson certifies that on June 30, 2010, a copy of the foregoing *Plaintiff's First Discovery Requests to Defendants and Proof of Service* was served upon all counsel of record via electronic mail and by U.S. First Class mail.



Leslie Johnson

Subscribed and sworn before me
this 30th day of June 2010.



Amos E. Williams, Notary Public
Wayne County, Michigan
My commission expires: 6/06/12