

MI-BM-080-04

B

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

LISA WEIAND SULLINS,

Plaintiff,

vs.

Case No. 03-5062-CL

SIENA GROUP, LLC, and CRAIG R. BUSH,
Et al., Jointly and Severally,

Hon. Richard L. Caretti

Defendants.

SOMMERS, SCHWARTZ, SILVER
& SCHWARTZ

By: Gerald D. Wahl (P26511)
Attorneys for Plaintiff
2000 Town Center, Ste. 900
Southfield, MI 48075-1100
(248) 746-4041

PLUNKETT & COONEY, P.C.
By: Theresa Smith Lloyd (P29963)
Attorneys for Defendants
38505 Woodward, Ste. 2000
Bloomfield Hills, MI 48304
(248) 991-4006

DEFENDANTS' MOTION TO COMPEL
PLAINTIFF'S DEPOSITION

NOW COME the Defendants, by and through their attorneys, PLUNKETT & COONEY, P.C., and bring this Motion to Compel Plaintiff's Deposition, stating as follows:

1. On January 30, 2004, Defendant scheduled Plaintiff's deposition for February 25, 2004.
2. That deposition was unilaterally cancelled by Plaintiff's attorney, who has not provided any alternate dates or produced for deposition his client for deposition.

D

Michigan Defendant Criminal Charges Relief Manual

**United States. Congress. Senate.
Committee on the Judiciary.
Subcommittee on Criminal Laws and
Procedures**

Michigan Defendant Criminal Charges Relief Manual:

State Postconviction Remedies and Relief Handbook ,2008 **A Treatise on the Law of Instructions to Juries in Civil and Criminal Cases** Henry Edward Randall,1922 **People v. Evans, 491 Mich 1 (2012)** ,2012 141381 **People v. Aaron; People v. Thompson; People v. Wright, 409 MICH 672 (1980)** ,1980 61194 **Manual for Courts-martial, United States** ,1995 **ALI-ABA's Practice Checklist Manual on Advising Business Clients II** ,2000 Disk contains forms and checklists from the printed text *The Law of Instructions to Juries in Civil and Criminal Cases* Edward Regnier Branson,1962 **Michigan Compiled Laws Annotated** Michigan,1967 **A Guide to Material on Crime and Criminal Justice** Augustus Frederick Kuhlman,Social Science Research Council (U.S.). Committee on Survey of Research on Crime and Criminal Justice,1929 *Blashfield's Instructions to Juries* De Witt Clinton Blashfield,1916 *Manual for Courts-Martial 2012* United States Department Of Defense,2012 The Manual for Courts Martial MCM United States 2012 Edition updates the MCM 2008 Edition It is a complete reprinting and incorporates the MCM 2008 Edition including all amendments to the Rules for Courts Martial Military Rules of Evidence Mil R Evid and Punitive Articles made by the President in Executive Orders EO from 1984 to present and specifically including EO 13468 24 July 2008 EO 13552 31 August 2010 and EO 13593 13 December 2011 This edition also contains amendments to the Uniform Code of Military Justice UCMJ made by the National Defense Authorization Acts for Fiscal Years 2009 through 2012 Some of the significant changes are summarized and listed below This summary is for quick reference only and should not be relied upon or cited by practitioners in lieu of the actual provisions of the MCM that have been amended The MCM 2012 Edition includes unique changes warranting attention Manual for Courts-martial United States. Department of Defense,2008 *People v. Gross (After Remand), 446 MICH 587 (1994)* ,1994 97021 *Prisoners' Self-Help Litigation Manual* John Boston,Daniel E Manville,2010-08-30 Prisoners Self Help Litigation Manual in its much anticipated fourth edition is an indispensable guide for prisoners and prisoner advocates seeking to understand the rights guaranteed to prisoners by law and how to protect those rights Clear comprehensive practical advice provides prisoners with everything they need to know on conditions of confinement civil liberties in prison procedural due process the legal system how to litigate conducting effective legal research and writing legal documents Written by two legal and penitentiary experts with intimate knowledge of prisoner s rights and legal aid work authors John Boston and Daniel E Manville strategically focus on federal constitutional law providing prisoners and those wishing to assist them with the most important information concerning legal rights Over the past decade prison law and conditions have changed significantly This new edition is updated to include the most relevant prisoners rights topics and approaches to litigation Updates include all aspects of prison life as well as material on legal research legal writing types of legal remedies and how to effectively use those remedies Certainly the most authoritative well organized and relevant prisoner s rights manual available the eagerly awaited fourth edition should be purchased by

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