

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

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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

Stacy Moak, Ronald Carlson



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

everyone interested in civil rights for the incarcerated **People v. Heflin; People v. Landrum, 434 MICH 482 (1990)**
 ,1990 83994 **The Federal Reporter** ,1928 **Federal Reporter** ,1926 **Criminal Justice Procedure** Stacy
 Moak,Ronald Carlson,2014-09-25 Criminal Justice Procedure gives clear guidance on the most common questions faced by
 today s law enforcement offering fresh look at 21st century pre trial protocol Unlike other case books this newly revised
 edition eschews legal theory in favor of the practical know how needed to not to parse but apply criminal law Emphasis has
 been placed on just exactly how practitioners should conduct hot button procedures such as airport and border searches
 Moreover the book also addresses the often dire implications of deviating from proper practice how a false step can translate
 into a violation of individual rights or the inability to successfully prosecute the guilty This edition has been specifically
 designed for CJ undergraduate programs rather than higher level law schools and completely reorganized for a more logical
 flow of topics Moreover it is newly focused on the most crucial practical applications of the law in the CJ context There is also
 added emphasis on the Fourth Fifth and Sixth Amendments **The Encyclopaedia of Pleading and Practice** ,1901
Reform of the Federal Criminal Laws: Civil rights offenses, corporate and business offenses, public duty defenses,
sentencing, and other provisions United States. Congress. Senate. Committee on the Judiciary. Subcommittee on Criminal
 Laws and Procedures,1975

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Table of Contents Michigan Defendant Criminal Charges Relief Manual

1. Understanding the eBook Michigan Defendant Criminal Charges Relief Manual
 - The Rise of Digital Reading Michigan Defendant Criminal Charges Relief Manual
 - Advantages of eBooks Over Traditional Books
2. Identifying Michigan Defendant Criminal Charges Relief Manual
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Michigan Defendant Criminal Charges Relief Manual
 - User-Friendly Interface
4. Exploring eBook Recommendations from Michigan Defendant Criminal Charges Relief Manual
 - Personalized Recommendations
 - Michigan Defendant Criminal Charges Relief Manual User Reviews and Ratings
 - Michigan Defendant Criminal Charges Relief Manual and Bestseller Lists
5. Accessing Michigan Defendant Criminal Charges Relief Manual Free and Paid eBooks

- Michigan Defendant Criminal Charges Relief Manual Public Domain eBooks
- Michigan Defendant Criminal Charges Relief Manual eBook Subscription Services
- Michigan Defendant Criminal Charges Relief Manual Budget-Friendly Options
- 6. Navigating Michigan Defendant Criminal Charges Relief Manual eBook Formats
 - ePub, PDF, MOBI, and More
 - Michigan Defendant Criminal Charges Relief Manual Compatibility with Devices
 - Michigan Defendant Criminal Charges Relief Manual Enhanced eBook Features
- 7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Michigan Defendant Criminal Charges Relief Manual
 - Highlighting and Note-Taking Michigan Defendant Criminal Charges Relief Manual
 - Interactive Elements Michigan Defendant Criminal Charges Relief Manual
- 8. Staying Engaged with Michigan Defendant Criminal Charges Relief Manual
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Michigan Defendant Criminal Charges Relief Manual
- 9. Balancing eBooks and Physical Books Michigan Defendant Criminal Charges Relief Manual
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Michigan Defendant Criminal Charges Relief Manual
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Michigan Defendant Criminal Charges Relief Manual
 - Setting Reading Goals Michigan Defendant Criminal Charges Relief Manual
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Michigan Defendant Criminal Charges Relief Manual
 - Fact-Checking eBook Content of Michigan Defendant Criminal Charges Relief Manual
 - Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development

- Exploring Educational eBooks

14. Embracing eBook Trends

- Integration of Multimedia Elements
- Interactive and Gamified eBooks

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