

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF ST. CLAIR**

JAMES R. FREED,
an Individual,

Plaintiff,

vs.

Case No. 22-001981- CZ
Hon. Michael West

INTERNATIONAL CITY/COUNTY MANAGEMENT ASSOCIATION,
a D.C. Non-Profit Corporation, JESSICA COWLES, an Individual,
VICTOR CARDENAS, an Individual, CORRI SPIEGEL, an Individual,
DIANE STODDARD, an Individual, JEFF TOWERY, an Individual,
JIM MALLOY, an Individual, KENNETH WILLIAMS, an Individual,
MICHAEL KAIGLER, an Individual, MOLLY MEHNER, an Individual,
NATHANIEL PAGAN, an Individual, PAMELA ANTIL, an Individual,
PETER TROEDSSON, an Individual, RAY GONZALES, an Individual,
ROXANNE MURPHY, an Individual, SCOTT COLBY, JR., an Individual,
TROY BROWN, an Individual, VALMARIE TURNER, an Individual,
WILLIAM FRASER, an Individual, ROBERT KRISTOF, an Individual, and
CHRIS MACPHERSON, an Individual.

Defendants.

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**ORDER COMPELLING DISCOVERY FROM
INDIVIDUAL BOARD MEMBER DEFENDANTS**

At a session of said Court, held in the City of
Port Huron, County of St. Clair, and State of
Michigan on: April 25, 2023

PRESENT: HONORABLE MICHAEL WEST, Circuit Judge

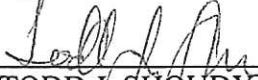
This matter having come before the Court on Plaintiff's motion to compel and Defendants VICTOR CARDENAS, CORRI SPIEGEL, DIANE STODDARD, JEFF TOWERY, JIM MALLOY, KENNETH WILLIAMS, MICHAEL KAIGLER, MOLLY MEHNER, NATHANIEL PAGAN, PAMELA ANTIL, PETER TROEDSSON, RAY GONZALES, ROXANNE MURPHY, SCOTT COLBY, JR., TROY BROWN, VALMARIE TURNER, WILLIAM FRASER, ROBERT KRISTOF, and CHRIS MACPHERSON (hereinafter "the Individual Board Member Defendants"), the Individual Board Member Defendants through counsel having filed a response, and the Court having conducted a hearing on April 24, 2023, and the Court being otherwise advised in the premises;

IT IS HEREBY ORDERED that within thirty (30) days of the date of this order, the Individual Board Member Defendants:

1. Must provide full and complete answers to the interrogatories, and those responses must be sworn as to their accuracy as required under MCR 2.309(B).
2. Provide full and complete responses to the document requests and produce all responsive documents in unredacted form.

IT IS SO ORDERED.

Approved as to form:

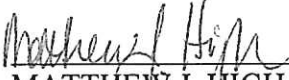


TODD J. SHOUDY (P41895)
Attorney for Plaintiff

MICHAEL L. WEST

HON. MICHAEL WEST, Circuit Judge

A TRUE COPY
Angie Waters
County Clerk



MATTHEW J. HIGH (P82783)
Attorney for Defendant ICMA

w/permission via email 4/24/23