

CHERYL HEWITT,

Plaintiff,

Case No.: 03 1618 NI

Honorable Diane Druzinski

SUBURBAN MOBILITY AUTHORITY FOR
REGIONAL TRANSPORTATION a/k/a SMART,
a Michigan corporation,

Defendant.

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DEFENDANT SMART'S MOTION TO
COMPEL DISCOVERY

NOW COMES the Defendant, Suburban Mobility Authority for Regional Transportation a/k/a SMART, a Michigan Corporation, by and through its attorneys, ZAUSMER, KAUFMAN, AUGUST & CALDWELL, P.C., and in support of its Motion to Compel Discovery states as follows:

1. On or about July 18, 2003, Defendant requested, via Michigan Legal Copy, L.L.C., authorization to copy the records of St. John's Macomb Hospital, Crestview Dental, Dr. Morrison and Dr. Rathur with respect to Plaintiff Cheryl Hewitt.
2. To date, Plaintiff has failed to provide authorizations for these records.
3. Defendant's ability to litigate this case will be greatly prejudiced if these authorizations are not provided.

WHEREFORE, Defendant prays that this Honorable Court enter an Order requiring Plaintiff to submit authorizations to Michigan Legal Copy, L.L.C., for the records of St. John Macomb Hospital, Crestview Dental, Dr. Morrison and Dr. Rathur within a period of seven (7) days from the date of hearing on this Motion, for failure of which Plaintiffs' Complaint shall be dismissed, and that Defendant shall have costs and fees necessary for the presentment of this Motion.

Michigan Defendant Charges Relief Manual

Huangqi Zhang



Michigan Defendant Charges Relief Manual:

Prisoners' Self-help Litigation Manual John Boston, Daniel E. Manville, 2010 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 This new edition is updated to include the most relevant prisoners rights topics and approaches to litigation types of legal remedies and how to effectively use those remedies *Michigan Compiled Laws Annotated* Michigan, 1967 **People v. Pepper, 389 MICH 317 (1973)**, 1973 53803 *People v. Evans*, 491 Mich 1 (2012), 2012 141381 *Brickwood's Sackett on Instructions to Juries* Frederick Sackett, Albert William Brickwood, 1908 *Blashfield's Instructions to Juries* De Witt Clinton Blashfield, 1916 **MARY GARCIA V MCCORD GASKET CORPORATION, 449 MICH 16 (1995)**, 1995 97957 **A Treatise on the Law of Instructions to Juries in Civil and Criminal Cases** Henry Edward Randall, 1922 **Labor Relations Reference Manual**, 1998 Vols 9 17 include decisions of the War Labor Board **People v. Strong, 404 MICH 357 (1978)**, 1978 60054 *A Manual for Constables, Marshals, Policemen, and Other Ministerial Officers in Ohio* Florien Giauque, 1891 *A Manual for Constables, Marshals, Policemen, and Other Ministerial Officers in Ohio, with Practical Instructions and Forms* Florien Giauque, 1892 *People v. Hoaglin*, 262 MICH 162 (1933), 1933 157 159 **School Busing** United States. Congress. House. Committee on the Judiciary. Subcommittee No. 5, 1972 **Cyclopedia of the Law of Private Corporations** William Meade Fletcher, 1920 **Current Law**, 1911 **The Northeastern Reporter**, 1910 Cases argued and determined in the courts of Illinois Indiana Massachusetts New York Ohio with key number annotations varies *The Federal Reporter*, 1928 Digest of Decisions Under the Interstate Commerce Act, from 1908 Herbert Confield Lust, Ralph Merriam, 1913 **The Law of Instructions to Juries**, 1914

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