

**STATE OF MICHIGAN
IN THE COURT OF CLAIMS**

MICHIGAN OPEN CARRY, INC,
Plaintiff/Petitioner,

Case No.: 18-000087-MZ
Honorable Cynthia Stephens

v.

DISCOVERY

MICHIGAN DEPARTMENT OF STATE
POLICE also commonly known as the
MICHIGAN STATE POLICE,
Defendant

OUTSIDE LEGAL COUNSEL PLC
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THIRD SET OF DISCOVERY REQUESTS (DATABASE CASE)

TO: DEFENDANT MICHIGAN DEPARTMENT OF STATE POLICE

As used within this request:

A. "Identify" when referring to an individual, corporation, or other entity shall mean to set forth the name, address, and telephone number, and if a corporation or other entity, its principle place of business, or if an individual, the present or last known home address, his or her job title or titles, by whom employed and address of the place of employment.

B. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's principals, employees, staffers, agents, insurance companies, representatives, and unless privileged, his, her, or its attorney or attorneys. When an answer/response is made by a corporate or other non-individual party, state the name, address and title of person(s) supplying the information and list the source of his or her information.

C. The pronoun "you" refers to the party this request is directed at as well as to the individuals and entities mentioned in subsection (B) above.

Kindly answer, respond, and/or produce, in full, all discovery items/requests propounded below pursuant to MCR 2.302, MCR 2.309, MCR 2.310, and/or MCR 2.312 of the Michigan Court Rules:

1. INTERROGATORY: As part of your response to Plaintiff's FOIA request dated October 26, 2017 (see attached), you provided the following statement:

Your request to grant as the information currently available. *** In the spirit of cooperation, we have summarized the information you are requesting below:

- 1- 24,493
- 2- 1,771
- 3- 48,626
- 4 - 1,448,241
- 5- 905,110
- 6- 42,329
- 7- 87,717

Please explain in precise detail what each of these numbers purport to count, represent, summarize, and/or otherwise disclose. For example, the statement "1-24,493" is mean to disclose: 24,493 _____? (Please explain what each number, 1 through 7, means.)

2. INTERROGATORY: Identify all persons with whom you consulted and/or checked with to investigate actual or possible answers to these discovery requests; for each person, itemize each discovery request the person contributed information which became your answer in response thereto.

Date: August 1, 2018

RESPECTFULLY SUBMITTED:

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing document(s) was served on parties or their attorney of record by mailing the same via US mail to their respective business address(es) as disclosed by the pleadings of record herein with postage fully prepaid, on the

1st day of August, 2018.

Philip L Ellison

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**Electronic signature authorized by MCR 2.114(C)(3) and MCR 1.109(D)(1)-(2)