

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<p>JOSEPH SAAD, INDIVIDUALLY, ZIHRA SAAD, INDIVIDUALLY,</p> <p>PLAINTIFFS,</p> <p>- VS -</p> <p>CITY OF DEARBORN HEIGHTS, ET AL.,</p> <p>DEFENDANTS.</p>	<p>CIVIL CASE No. 2:11-cv-10103</p> <p>NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)</p> <p>- HONORABLE PATRICK J. DUGGAN -</p> <p>- MAGISTRATE JUDGE MARK A. RANDON -</p>
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HADOUSCO. | PLLC

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|AZ: 027529 | CA: 264431|
UNITED STATES COURTS:
- SIXTH CIRCUIT COURT OF APPEALS
- DISTRICT OF ARIZONA
- EASTERN DISTRICT OF MICHIGAN
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ATTORNEYS FOR DEFENDANTS

NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)

1 **YOU ARE HEREBY NOTIFIED** that pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs will
2 take the depositions upon oral examination of the City of Dearborn Heights (“Defendant”)
3 regarding, without limitation, the following matters:

- 4 (1) Defendant’s guidelines and policies regarding the training of City of
5 Dearborn Heights police officers; and
- 6 (2) Defendant’s guidelines and policies regarding any continuing education,
7 legal updates, and/or seminar attendance requirements for Dearborn
8 Heights police officers; and
- 9 (3) Defendant’s internal review and compliance guidelines and policies
10 regarding verifying whether Dearborn Heights police officers are
11 complying with continuing education, legal updates, and seminar
12 attendance requirements.
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14 Please designate one or more officers, directors, managing agents, or other persons
15 pursuant to Fed. R. Civ. P. 30(b)(6) to testify on behalf of Defendant regarding the above-listed
16 matters on February 7, 2012, at 10:00 a.m. at the office of:
17

18
19 CUMMINGS, McCLOREY, DAVIS & ACHO, PLC
20 33900 Schoolcraft Road,
21 Livonia, Michigan, 48150.

22 The testimony will be recorded by Stenographic means.
23

24 **DATED THIS 23RD DAY OF JANUARY 2012,**
25

26
27 HADOUSCo. |PLLC

28
29 /s/NEMER N. HADOUS
30 **BY:** NEMER N. HADOUS |AZ: 027529 | CA: 264431|
31 UNITED STATES COURTS:
32 - SIXTH CIRCUIT COURT OF APPEALS
33 - DISTRICT OF ARIZONA
34 - EASTERN DISTRICT OF MICHIGAN
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40
41 ATTORNEY FOR PLAINTIFFS
42 JOSEPH SAAD AND ZIHRA SAAD
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PROOF OF SERVICE

THE UNDERSIGNED CERTIFIES THAT A COPY OF THE FOREGOING INSTRUMENT WAS SERVED UPON THE PARTIES TO THE ABOVE-CAPTIONED MATTER AT THEIR RESPECTIVE ADDRESSES DISCLOSED ON THE PLEADINGS ON THE **23RD** DAY OF **JANUARY 2012** BY:

- X FIRST CLASS MAIL
- X EMAIL

SIGNATURE: /s/NEMER N. HADOUS
NEMER N. HADOUS

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