



ATTORNEYS AND COUNSELORS AT LAW  
33900 SCHOOLCRAFT ROAD ■ LIVONIA, MICHIGAN 48150 ■ PHONE: (734) 261-2400 ■ FACSIMILE: (734) 261-4510

Patrick R. Sturdy  
psturdy@cnda-law.com

December 19, 2011

Nemer N. Hadous, Esq.  
835 Mason Street, Suite 150-A  
Dearborn, Michigan 48124

RE: Saad, Joseph & Zihra v City of Dearborn Heights, et al.  
Case No: 2:11-cv-10103/Hon. Patrick J. Duggan  
CMDA File No: 100741

Dear Mr. Hadous:

Enclosed please find Defendant City of Dearborn Heights' Notice of Taking Independent Medical Examination Plaintiff, Joseph Saad, and Notice of Taking Independent Medical Examination of Plaintiff, Zihra Saad, with regard to the above-referenced matter.

Very truly yours,

**CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.**



Patrick R. Sturdy

/dmw

Enclosures

cc: Haytham Faraj, Esq.  
Harvey G. Ager, M.D.

(dmw)H:\Saad #2 #100741\hadous ltr 12-19.11.wpd

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JOSEPH SAAD, Individually, ZIHRA SAAD,  
Individually,

Plaintiffs,

CASE NO: 2:11-cv-10103-SJM-MAR

vs.

HON. PATRICK J. DUGGAN  
MAGISTRATE JUDGE MARK A. RANDON

CITY OF DEARBORN HEIGHTS, SCOTT  
KELLER, Individually and in his official  
capacity; CARRIE CATES, Individually and  
in her official capacity; RESERVE OFFICER  
NASON, Individually and in his official capacity;  
GREG GONDEK, Individually and in his  
official capacity; JERRY SKELTON, individually  
and in his official capacity; and JOHN DOE  
OFFICERS I-XXX, Individually and in their  
official capacities,

Defendants.

**NOTICE OF TAKING INDEPENDENT  
MEDICAL EXAMINATION OF  
PLAINTIFF, JOSEPH SAAD**

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HADOUSCO. PLLC

By: NEMER N. HADOUS (CA: 264431) (AZ: 027529)  
Admitted to the United States District Court,  
Eastern District of Michigan  
835 Mason Street, Suite 150-A  
Dearborn, Michigan 48124  
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PUCKETT & FARAJ, P.C.

By: HAYTHAM FARAJ (P-72581)  
835 Mason Street, Suite 150-A  
Dearborn, Michigan 48124  
(760)521-7934  
Email: [hatham@puckettfaraj.com](mailto:hatham@puckettfaraj.com)

CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.

By: JEFFREY R. CLARK (P-33074)  
PATRICK R. STURDY (P-57466)  
Attorneys for City of Dearborn Heights, Scott Keller,  
Carrie Cates, Officer Nason, Greg Gondek and Jerry  
Skelton  
33900 Schoolcraft Road  
Livonia, Michigan 48150  
(734)261-2400

---


**NOTICE OF TAKING INDEPENDENT MEDICAL EXAMINATION  
OF PLAINTIFF, JOSEPH SAAD**

TO: Nemer N. Hadous, Esq.  
Haytham Faraj, Esq.  
835 Mason Street, Suite 150-A  
Dearborn, Michigan 48124

**PLEASE TAKE NOTICE** that an Independent Medical Examination for Plaintiff, JOSEPH SAAD, has been scheduled for **Friday, January 27, 2012 at 9:30 a.m.** at the offices of HARVEY G. AGER, M.D., P.C., CARSON CENTRE, 29355 NORTHWESTERN HIGHWAY, SUITE 140, SOUTHFIELD, MICHIGAN 48034 (248)356-8050.

Respectfully submitted,

**CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.**

BY: 

JEFFREY R. CLARK (P-33074)  
PATRICK R. STURDY (P-57466)  
Attorneys for Defendants  
33900 Schoolcraft Road  
Livonia, Michigan 48150  
(734) 261-2400

Dated: December 19, 2011

H:\Saad #2 #10074\Notice of IME (Joseph #2).wpd

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JOSEPH SAAD, Individually, ZIHRA SAAD,  
Individually,

Plaintiffs,

CASE NO: 2:11-cv-10103-SJM-MAR

vs.

HON. PATRICK J. DUGGAN  
MAGISTRATE JUDGE MARK A. RANDON

CITY OF DEARBORN HEIGHTS, SCOTT  
KELLER, Individually and in his official  
capacity; CARRIE CATES, Individually and  
in her official capacity; RESERVE OFFICER  
NASON, Individually and in his official capacity;  
GREG GONDEK, Individually and in his  
official capacity; JERRY SKELTON, individually  
and in his official capacity; and JOHN DOE  
OFFICERS I-XXX, Individually and in their  
official capacities,

Defendants.

\_\_\_\_\_  
HADOUSCO. PLLC

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33900 Schoolcraft Road  
Livonia, Michigan 48150  
(734)261-2400  
\_\_\_\_\_

**CERTIFICATE OF SERVICE**

DIANE M. WALDENMAYER, states that on the 19th day of December, 2011, she served a copy  
of *Notice of Taking Independent Medical Examination of Plaintiff, Joseph Saad and this Certificate of  
Service, upon:*

Nemer N. Hadous, Esq.  
Haytham Faraj, Esq.  
835 Mason Street, Suite 150-A  
Dearborn, Michigan 48124

by placing said copies in envelopes, correctly and plainly addressed as shown above, and depositing said envelopes in the United States mails, with postage thereon fully prepaid.

  
DIANE M. WALDENMAYER

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JOSEPH SAAD, Individually, ZIHRA SAAD,  
Individually,

Plaintiffs,

vs.

CASE NO: 2:11-cv-10103-SJM-MAR

HON. PATRICK J. DUGGAN  
MAGISTRATE JUDGE MARK A. RANDON

CITY OF DEARBORN HEIGHTS, SCOTT  
KELLER, Individually and in his official  
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in her official capacity; RESERVE OFFICER  
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Defendants.

**NOTICE OF TAKING INDEPENDENT  
MEDICAL EXAMINATION OF  
PLAINTIFF, ZIHRA SAAD**

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(734)261-2400

\_\_\_\_\_


**NOTICE OF TAKING INDEPENDENT MEDICAL EXAMINATION  
OF PLAINTIFF, ZIHRA SAAD**

TO: Nemer N. Hadous, Esq.  
Haytham Faraj, Esq.  
835 Mason Street, Suite 150-A  
Dearborn, Michigan 48124

**PLEASE TAKE NOTICE** that an Independent Medical Examination for Plaintiff, ZIHRA SAAD, has been scheduled for **Friday, January 27, 2012 at 12:30 p.m.** at the offices of HARVEY G. AGER, M.D., P.C., CARSON CENTRE, 29355 NORTHWESTERN HIGHWAY, SUITE 140, SOUTHFIELD, MICHIGAN 48034 (248)356-8050.

Respectfully submitted,

**CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.**

BY:   
JEFFREY R. CLARK (P-33074)  
PATRICK R. STURDY (P-57466)  
Attorneys for Defendants  
33900 Schoolcraft Road  
Livonia, Michigan 48150  
(734) 261-2400

Dated: December 19, 2011

H:\Saad #2 #100741\Notice of IME (Zihra #2).wpd

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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Individually,

Plaintiffs,

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KELLER, Individually and in his official  
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**CERTIFICATE OF SERVICE**

DIANE M. WALDENMAYER, states that on the 19th day of December, 2011, she served a copy  
of *Notice of Taking Independent Medical Examination of Plaintiff, Zihra Saad and this Certificate of Service,*  
upon:



Nemer N. Hadous, Esq.  
Haytham Faraj, Esq.  
835 Mason Street, Suite 150-A  
Dearborn, Michigan 48124

by placing said copies in envelopes, correctly and plainly addressed as shown above, and depositing said envelopes in the United States mails, with postage thereon fully prepaid.

  
DIANE M. WALDENMAYER