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NEMER N. HADOUS |AZ: 027529 | CA: 264431| Phone: (313) 415-5559 Email: nhadous@hadousco.com United States Courts: Sixth Circuit Court of Appeals District of Arizona Eastern District of Michigan

BY EMAIL ONLY

To:	<u>Patrick R. Sturdy, Esq.</u>
	33900 Schoolcraft Road
	Livonia, Michigan 48150
	psturdy@cmda-law.com

Date: December 9, 2011

Pages: 1 + Enclosures

Re: Saad v. City of Dearborn Heights, et al.

Dear Mr. Sturdy,

Further to our discussion, Plaintiffs' medical providers should include Dr. Jiab Suleiman 23500 Park St # 3, Dearborn, MI 48124-2598 (Zihra Saad) and Botsford Hospital (Joseph Saad). Please direct your Medical Records Deposition Service, Incorporated to provide us with these additional requests for Medical Authorizations and we will promptly execute and return these.

We are returning executed copies of Plaintiffs' Medical Authorizations to Records Deposition Service, Incorporated which have been previously requested.

Please note that we have not received full copies of the Defendants' insurance policy as requested in **Plaintiffs' First Set of Requests for Production of Documents No. 2.** Accordingly, we will insist on complete production of these policies as set forth more specifically in Plaintiffs' Second Request for Production of Documents (as well as production of all other documents requested therein or other response/objection to the same).

Because of the limited discovery period, we have no choice but to seek to immediately compel production of any requested documents to the extent they are withheld so as to avoid further extending the discovery deadline.

11-10103-D-L-12.9.11

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Please let us know convenient dates for your expert to conduct Defendants' medical examination and I will coordinate with my clients for a mutually convenient dates/times. Also, we await available dates for the Defendants' remaining depositions as discussed.

Cordially,

HADOUSCO. |PLLC

<u>/s/Nemer N. Hadous</u> Nemer N. Hadous |AZ: 027529| CA: 264431|

Cc:

Jeffrey R. Clark (via jclark@cmda-law.com)

Haytham Faraj (via Haytham@puckettfaraj.com)