

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><b>NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)</b></p> <p>- HONORABLE PATRICK J. DUGGAN -</p> <p>- MAGISTRATE JUDGE MARK A. RANDON -</p>
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**HADOUSCO. | PLLC**

NEMER N. HADOUS  
|AZ: 027529 | CA: 264431|  
UNITED STATES COURTS:  
- SIXTH CIRCUIT COURT OF APPEALS  
- DISTRICT OF ARIZONA  
- EASTERN DISTRICT OF MICHIGAN  
835 MASON STREET, SUITE 150-A  
DEARBORN, MICHIGAN 48124  
P: (313) 450-4670  
F: (888) 450-0687  
E: NHADOUS@HADOUSCO.COM

ATTORNEY FOR PLAINTIFFS

JOSEPH SAAD AND ZIHRA SAAD

**PUCKETT & FARAJ, PC**

HAYTHAM FARAJ |P-72581|  
835 MASON STREET, SUITE 150-A  
DEARBORN, MICHIGAN 48124  
P: (760) 521-7934  
E: HAYTHAM@PUCKETTFARAJ.COM

ATTORNEY FOR PLAINTIFFS

JOSEPH SAAD AND ZIHRA SAAD

**CUMMINGS, McCLOREY, DAVIS & ACHO, PLC**

JEFFREY R. CLARK |P-33074|  
PATRICK R. STURDY |P-57466|  
33900 SCHOOLCRAFT ROAD  
LIVONIA, MICHIGAN 48150  
P: (734) 261-2400  
E: JCLARK@CMDA-LAW.COM

ATTORNEYS FOR DEFENDANTS

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**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 its Mobile Video Recording
- 5           Equipment including preservation and storage of audio/video recordings;
- 6           (2) The person or persons responsible for maintaining the MVRE and
- 7           audio/video recordings as of the April 2010 including: (1) the Police
- 8           Systems Administrator; (2) the Administrative Support Sergeant; and (3)
- 9           the Property Officer; and
- 10

11  
12           Please designate one or more officers, directors, managing agents, or other persons  
13 pursuant to Fed. R. Civ. P. 30(b)(6) to testify on behalf of Defendant regarding the above-listed  
14 matters on February 10, 2012, at 10:00 a.m. at the office of:

15  
16                                   CUMMINGS, McCLOREY, DAVIS & ACHO, PLC  
17                                   33900 Schoolcraft Road,  
18                                   Livonia, Michigan, 48150.

19           The testimony will be recorded by Stenographic means.

20  
21           **DATED THIS 25TH DAY OF JANUARY 2012,**

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24                                   HADOUSCO. |<sup>PLLC</sup>

25                                   /s/NEMER N. HADOUS

26                                   BY: NEMER N. HADOUS |AZ: 027529 | CA: 264431|

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- 30                                   - EASTERN DISTRICT OF MICHIGAN

31                                   835 MASON STREET, SUITE 150-A  
32                                   DEARBORN, MICHIGAN 48126

33                                   P: (313) 450-0687

34                                   F: (888) 450-0687

35                                   E: NHADOUS@HADOUSCO.COM

36                                   ATTORNEY FOR PLAINTIFFS

37                                   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 **25TH** DAY OF **JANUARY 2012** BY:

- FIRST CLASS MAIL
- EMAIL

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