

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LINDA DeVOOGHT, TRESSA SINHA,
JENNIFER PIPER, DONNA TRIPI,
SUZANNE CHAFFIN, CHERYL OSOWSKI,
DAWN MCLEAN, and AMBER MAVIS

Case No. 2:20-cv-10812-GCS-
Hon. George Caram Steeh
Mag. Judge David R. Grand

Plaintiffs,

vs.

CITY OF WARREN,

Defendant.

PITT McGEHEE PALMER & RIVERS

By: MICHAEL L. PITT (P24429)
ROBIN B. WAGNER (79408)
KEVIN M. CARLSON (P67704)

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**DEFENDANT CITY OF WARREN'S ANSWER TO FIRST
AMENDED VERIFIED COMPLAINT (DK #12)**

Now Comes Defendant City of Warren (hereinafter "Defendant" or "Warren"), by and through its attorneys, Kirk, Huth, Lange & Badalamenti, PLC, and in Answer to the First Amended Verified Complaint for Damages, Declaratory Judgment, Injunctive Relief and Jury Demand, states as follows:

Defendant denies the introductory paragraphs in their entirety.

1. Answering paragraph 1, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

2. Answering paragraph 2, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

3. Answering paragraph 3, Defendant admits the allegation.

4. Answering paragraph 4, Defendant admits the allegation.

5. Answering paragraph 5, Defendant admits the allegation.

6. Answering paragraph 6, Defendant admits the allegation.

7. Answering paragraph 7, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs. In further response, Defendant states that Ms. Chaffin was voluntarily dismissed from this lawsuit (**ECF #13-14**).

8. Answering paragraph 8, Defendant admits the allegation.

9. Answering paragraph 9, Defendant admits the allegation.

10. Answering paragraph 10, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs. In further response, Defendant states that Ms. Mavis was voluntarily dismissed from this lawsuit (**ECF #13-14**).

11. Answering paragraph 11, Defendant admits the allegation.

12. Answering paragraph 12, Defendant admits the allegation to the extent this Court has jurisdiction.

Statement of Facts

13. Answering paragraph 13, Defendant admits the allegation.

14. Answering paragraph 14, Defendant admits that the dispatchers employed by the City of Warren are covered by the terms of the WPOA and WCOA Collective Bargaining Agreements but deny that individual pay is specified in the same.

15. Answering paragraph 15, Defendant admits the allegations contained therein.

16. Answering paragraph 16, Defendant admits the allegations contained therein.

17. Answering paragraph 17, Defendant admits the allegations contained therein.

18. Answering paragraph 18, Defendant admits the allegations contained therein.

19. Answering paragraph 19, no response is required.

20. Answering paragraph 20, Defendant admits the allegations contained therein.

21. Answering paragraph 21, Defendant admits the allegations contained therein.

22. Answering paragraph 22, no response is required.

23. Answering paragraph 23, Defendant admits the allegations contained therein.

24. Answering paragraph 24, including sub-paragraphs (a)-(c), Defendant states that the General Order referenced therein speaks for itself and denies that the allegations contained in this paragraph accurately or completely describe the policies of Warren in respect to dispatcher duties, dispatch supervisor duties, or prisoner searches.

25. Answering paragraph 25, Defendant states that the General Order referenced therein speaks for itself and denies that the allegations contained in this paragraph accurately or completely describe the policies of Warren in respect to dispatcher duties, dispatch supervisor duties, or prisoner searches.

26. Answering paragraph 26, Defendant states that the General Order referenced therein speaks for itself and denies that the allegations contained in this paragraph accurately or completely describe the policies of Warren in respect to dispatcher duties, dispatch supervisor duties, or prisoner searches.

27. Answering paragraph 27, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

28. Answering paragraph 28, Defendant admits that all dispatchers, including female dispatchers, have been required to perform searches of prisoners as necessary since before 1999 when the first of the Plaintiffs secured employment as a Dispatcher with the City of Warren.

29. Answering paragraph 29, Defendant admits only that several City of Warren Police Department General Orders covered the subject of Dispatcher searches prior to 2017 including General Order No. 11-03: Prisoner Processing (effective May 17, 2011) which is not accurately or completely described in this paragraph.

30. Answering paragraph 30, Defendant admits only that several City of Warren Police Department General Orders covered the subject of Dispatcher searches prior to 2011 including General Order No. 05-02: Prisoner Processing (effective August 4, 2005) which is not accurately or completely described in this paragraph.

31. Answering paragraph 31, Defendant admits the allegations contained therein.

32. Answering paragraph 32, Defendant admits that General Order No. 02-01 specifically details all dispatchers' duty to assist in the processing of prisoners in the Warren Jail.

33. Answering paragraph 33, Defendant denies the allegation given the job description and General Order regarding duties of Dispatch Supervisors expressly is required to "Perform[] general dispatch duties."

34. Answering paragraph 34, Defendant states that no response is required as the collective bargaining agreements referenced speak for themselves.

35. Answering paragraph 35, Defendant denies the allegations contained therein as they are untrue in the manner and form alleged.

36. Answering paragraph 36, Defendant denies the allegations contained therein as they are untrue in the manner and form alleged.

37. Answering paragraph 37, Defendant denies the allegations contained therein as they are untrue in the manner and form alleged.

38. Answering paragraph 38, Defendant admits the allegations contained therein.

39. Answering paragraph 39, Defendant denies the allegations contained therein as they are untrue in the manner and form alleged.

40. Answering paragraph 40, Defendant states that no response is necessary as the General Order 17-10 referenced therein speaks for itself.

41. Answering paragraph 41, Defendant states that no response is necessary as the General Order 17-10 referenced therein speaks for itself.

42. Answering paragraph 42, Defendant denies the allegations as untrue in the manner and form alleged.

43. Answering paragraph 43, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

44. Answering paragraph 44, Defendant admits the allegation.

45. Answering paragraph 45, Defendant denies the allegations as untrue in the manner and form alleged.

46. Answering paragraph 46, Defendant admits that part of dispatcher training includes the review of training videos on a continuing basis.

47. Answering paragraph 47, Defendant state no response is required where the conclusory statement is based on inaccurate facts.

48. Answering paragraph 48, Defendant admits that training of dispatchers includes in-person and video demonstrations by male police officers.

49. Answering paragraph 49, Defendant denies that there is a policy that precludes male dispatchers from prisoner searches.

50. Answering paragraph 50, Defendant admits the allegations contained therein.

51. Answering paragraph 51, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

52. Answering paragraph 52, Defendant admits the allegations but notes that general CDC-issued guidance provisions have no bearing on the need, duty or obligation incumbent upon the Warren Police Department and its employees, including Plaintiffs, to search prisoners in the Warren Jail to ensure public and co-worker safety.

53. Answering paragraph 53, including sub-paragraphs (a)-(d), Defendant admits that the CDC has issued guidance regarding personal protection equipment but notes that this guidance is ever-changing to meet, among other things, demand in the medical community.

54. Answering paragraph 54, Defendant denies the allegations as untrue. In fact, separate and multiple boxes of all CDC-recommended Personal Protection Equipment (“PPE”) including glasses and gowns was provided to the dispatchers

prior to initiation of this lawsuit and at the same time such PPE became available to the rest of Warren Police Department personnel. This averment was pled in bad faith where written confirmation and photographs of this PPE was transmitted to counsel for Plaintiffs days prior to this suit being filed and weeks prior to the filing of the Amended Complaint at Dk #12.

55. Answering paragraph 55, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

56. Answering paragraph 56, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

57. Answering paragraph 57, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

58. Answering paragraph 58, Defendant denies that officers are privy to additional PPE. In fact, separate and multiple boxes of all CDC-recommended Personal Protection Equipment (“PPE”) including glasses and gowns was provided to the dispatchers prior to initiation of this lawsuit and at the same time such PPE became available to the rest of Warren Police Department personnel. This averment was pled in bad faith where written confirmation and photographs of this PPE was transmitted to counsel for Plaintiffs days prior to this suit being filed and weeks prior to the filing of the Amended Complaint at Dk #12.

59. Answering paragraph 59, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

60. Answering paragraph 60, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

61. Answering paragraph 61, Defendant admits the allegation and that all dispatchers are trained and required to be physically able to perform custodial searches as described in the written job duties provided at the time they are hired and in WPD General Orders.

62. Answering paragraph 62, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

63. Answering paragraph 63, including sub-paragraphs (a)-(f), Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

64. Answering paragraph 64, including sub-paragraphs (a)-(d), Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

65. Answering paragraph 65, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient

information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

66. Answering paragraph 66, Defendant neither admits nor denies the allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

67. Answering paragraph 67, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

68. Answering paragraph 68, Defendant denies the allegations contained therein as untrue in the manner and form alleged.

69. Answering paragraph 69, Defendant denies that this paragraph accurately or completely described the job duties or General Orders of the City of Warren Police Department regarding dispatcher search obligations.

70. Answering paragraph 70, including sub-paragraphs (a)-(g), Defendant denies that it has been put on notice of any instance of a policy violation regarding dispatcher searches to the extent that any of the identified instances amount to such a violation of the actual policies in place in the Warren Police Department – which are not accurately or completely described in the pleading.

71. Answering paragraph 71, Defendant generally admits that the policy provides for “coverage” in the dispatch center in the event a dispatcher is needed for a prisoner search.

72. Answering paragraph 72, Defendant denies it has ever been put on notice of such an issue and, further, neither admits nor denies the specific sub-allegations contained in this paragraph for the reason that it is without sufficient information or knowledge upon which to form a belief and leaves Plaintiffs to their proofs.

73. Answering paragraph 73, Defendant denies the allegations as untrue in the manner and form alleged.

74. Answering paragraph 74, Defendant denies the allegations as untrue in the manner and form alleged.

75. Answering paragraph 75, Defendant denies the allegations as untrue in the manner and form alleged.

76. Answering paragraph 76, Defendant denies the allegations as untrue in the manner and form alleged.

77. Answering paragraph 77, Defendant states that no response is necessary as the memo referenced therein speaks for itself.

78. Answering paragraph 78, Defendant denies the allegations as untrue in the manner and form alleged.

79. Answering paragraph 79, Defendant denies the allegations as untrue in the manner and form alleged.

80. Answering paragraph 80, Defendant denies the allegations as untrue in the manner and form alleged.

81. Answering paragraph 81, Defendant denies the allegations as untrue in the manner and form alleged.

82. Answering paragraph 82, Defendant denies the allegations as untrue in the manner and form alleged.

83. Answering paragraph 83, Defendant denies the allegations as untrue in the manner and form alleged.

84. Answering paragraph 84, Defendant denies any suggestion that it has an insufficient number of female officers or inadequate recruitment efforts for female officers. In further response, Defendant denies that its average of female employees is below the average of other police departments.

85. Answering paragraph 85, Defendant denies the allegations as untrue in the manner and form alleged.

86. Answering paragraph 86, Defendant denies the allegations as untrue in the manner and form alleged.

Count One: 42 U.S.C. §1983
***Monell*-based Violation of Plaintiffs' Rights**
Under the Equal Protection Clause of the 14th Amendment

87. Defendant incorporates all preceding paragraphs hereof as though fully restated herein.

88. Answering paragraph 88, Defendant denies that this paragraph accurately or completely describes the applicable legal authorities.

89. Answering paragraph 89, Defendant denies that this paragraph accurately or completely describes the applicable legal authorities.

90. Answering paragraph 90, Defendant denies that this paragraph accurately or completely describes the applicable legal authorities.

91. Answering paragraph 91, Defendant denies the allegations as untrue in the manner and form alleged.

92. Answering paragraph 92, Defendant denies the allegations as untrue in the manner and form alleged.

93. Answering paragraph 93, including sub-paragraph (a)-(e), Defendant states that no response is necessary as the paragraph is a mere prayer for relief. To the extent that a response is required, Defendant denies that the requested relief is available or appropriate.

WHEREFORE, Defendant respectfully requests this matter be dismissed for lack of merit with prejudice and that its costs and fees so wrongfully incurred defending it be awarded.

Count Two: Violation of Elliot-Larsen Civil Rights Act, MCL 37.2101 et. seq.
Disparate Treatment in the Terms and Conditions
of Employment on the Basis of Sex

94. Defendant incorporates all preceding paragraphs hereof as though fully restated herein.

95. Answering paragraph 95, Defendant denies that this paragraph accurately or completely describes the applicable legal authorities.

96. Answering paragraph 96, Defendant admits the allegations contained therein.

97. Answering paragraph 97, Defendant denies the allegations as untrue in the manner and form alleged.

98. Answering paragraph 98, Defendant denies the allegations as untrue in the manner and form alleged.

99. Answering paragraph 99, including sub-paragraph (a)-(e), Defendant states that no response is necessary as the paragraph is a mere prayer for relief. To the extent that a response is required, Defendant denies that the requested relief is available or appropriate.

WHEREFORE, Defendant respectfully requests this matter be dismissed for lack of merit with prejudice and that its costs and fees so wrongfully incurred defending it be awarded.

Respectfully submitted,
KIRK, HUTH, LANGE & BADALAMENTI, PLC

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Dated: May 1, 2020

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DEFENDANT CITY OF WARREN’S RELIANCE UPON JURY DEMAND

Now Comes Defendant City of Warren, by and through its attorneys, Kirk,
Huth, Lange & Badalamenti, PLC, and hereby relies on Plaintiff’s Jury Demand
previously filed in this matter.

Respectfully submitted,
KIRK, HUTH, LANGE & BADALAMENTI, PLC

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Email: rbadalamenti@KirkHuthLaw.com
Attorneys for Defendant

Dated: May 1, 2020

KIRK, HUTH, LANGE & BADALAMENTI, P.L.C.

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**DEFENDANT CITY OF WARREN’S AFFIRMATIVE AND/OR
SPECIAL DEFENSES AND RESERVATION OF DEFENSES**

Now Comes Defendant City of Warren (hereinafter “Defendant” or “Warren”), by and through its attorneys, Kirk, Huth, Lange & Badalamenti, PLC, and state that they will assert the following Affirmative and/or Special Defenses and Reservation of Defenses in this matter:

1. Plaintiffs failed to state a claim upon which relief may be granted.
2. Plaintiffs’ claims fail, in whole or in part, because they are not ripe.

KIRK, HUTH, LANGE & BADALAMENTI, P.L.C.

3. Plaintiffs' claims fail based on their failure to satisfy conditions precedent to suit including, but not limited to, obtaining a Right to Sue letter from the Equal Employment Opportunity Commissioner, pursuing the relief sought in union negotiations and/or complying with the 4-step grievance process required under the applicable Collective Bargaining Agreements.

4. Plaintiffs' claims fail, in whole or in part, where they failed to exhaust their administrative remedies prior to commencement of this action.

5. Plaintiffs' claims fail where based on knowingly false averments.

6. Plaintiffs' claims fail where any gender-based classifications, if any, are genuine and serve an important governmental objective and the policies in question are substantially related to the achievement of those objectives.

7. Plaintiffs' claims are barred by release, waiver and/or consent.

8. Plaintiffs' claims are barred, in whole or in part, by the statute of limitations and/or the doctrine of laches.

9. Plaintiff's claims fail, in whole or in part, because the allegations of the Complaint are false, inaccurate and grossly exaggerated.

10. Plaintiffs' claims are barred to the extent Plaintiffs lack standing.

11. Plaintiffs' claims, including but not limited to any demand for punitive damages or attorney fees, against Defendant the City of Warren are barred

by the application of qualified immunity, absolute governmental immunity and/or other immunity provided by federal or state law.

12. Plaintiff's claims fail, in whole or in part, because there was no discrimination or unequal treatment based on gender or other protected class status.

13. Plaintiffs' claims fail because Plaintiffs have not suffered any adverse employment action.

14. There was no deprivation of any of Plaintiffs' federally protected rights, privileges, or immunities secured by United States Constitution or federal law by the Defendant.

15. Defendant, at all times, acted in good faith.

16. Plaintiffs at all times had notice of their job duties and the City of Warren agreed to compensate Plaintiffs only for performance of all of those job duties.

17. Defendant's actions and/or inactions were not deliberately indifferent.

18. The City of Warren cannot be liable where Plaintiffs were adequately trained with respect to prisoner searches.

19. There is no causal connection between the harm claimed by Plaintiffs in the current pandemic and any acts or omissions of Defendants, if any.

20. Plaintiffs have failed to state a claim against Defendant City of Warren as there is no governmental liability for an alleged failure to train and/or supervise employees.

21. Plaintiffs' damages and/or injuries, if any, are the result of Plaintiffs' own negligence and/or wrongful conduct.

22. Plaintiffs are barred from maintaining this action under the terms of the Warren Police Officer Collective Bargaining Agreement and/or Warren Command Officer Collective Bargaining Agreement.

23. There exists no unlawful or improper policy, practice or custom in the City of Warren that led to any alleged deprivation of Plaintiff's Constitutional or other rights to sustain a claim against the Defendant under 42 USC 1983.

24. Any claims predicated on respondeat superior liability under either state or federal law fail.

25. Plaintiffs failed to mitigate their damages.

26. Plaintiffs' claims are barred, in whole or in part, to the extent they are or they become moot.

27. Plaintiffs' claims are barred, in whole or in part, by their failure to elect their remedies.

28. Plaintiffs' claims fail where Plaintiffs, female dispatchers, were treated equally on the basis of sex with their male counterparts.

29. Plaintiffs' claims fail given that female dispatchers search of female prisoners is a bona fide occupation qualification reasonably necessary to the normal operation of the Warren Jail.

30. Plaintiffs' claims fail where no reasonable alternatives exist to requiring female dispatchers to search female prisoners given state and federal protections imposed upon Defendant regarding prisoner's right to privacy including under MCL 764.25a(3).

31. Plaintiffs' claims for injunctive relief fail, in whole or in part, because (A) Plaintiffs are not likely to succeed on the merits of their claims, (B) Plaintiffs will not suffer irreparable harm absent injunctive relief; (C) harm to others will result from issuance of the injunctive relief requested; and (D) injunctive relief is not in the public interest.

32. Defendant reserves the right to plead additional Affirmative Defenses as they become known through discovery.

Respectfully submitted,
KIRK, HUTH, LANGE & BADALAMENTI, PLC

By: s/ Raechel M. Badalamenti
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(586) 412-4900

Dated: May 1, 2020

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all ECF participants in this case. I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: None.

s/Raechel M. Badalamenti

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