



RESPONDING TO EMPLOYMENT-RELATED REQUESTS: SUBPOENAS, GARNISHMENTS, AND PERSONNEL FILES

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THE MADDIN HAUSER WAY

1. **ACT WITH INTEGRITY.**
2. **TREAT EACH OTHER LIKE FAMILY.**
3. **MAKE A DIFFERENCE.**
4. **DEMONSTRATE A PASSION FOR EXCELLENCE.**
5. **INVEST IN RELATIONSHIPS.**
6. **HONOR COMMITMENTS.**
7. **DO WHAT'S BEST FOR THE CLIENT.** In all situations, do what's best for the client. Client needs are always first and foremost, but with the recognition that our personal health and relationships should not be compromised as part of being an excellent professional. A team effort is often required.



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Overview

- Responding to Michigan subpoenas for employee records and depositions.
- Processing Michigan wage garnishments.
- Maintaining personnel files and responding to file requests under Michigan's Bullard-Plawecki Employee Right to Know Act ("B-PERKA").



**SUBPOENAS &
GARNISHMENTS:
NUTS & BOLTS**

WHAT IS A SUBPOENA?

Purpose

- Allows a litigant to gain access to documents and records
- Uncovers the facts of a case

Powers

- Functions as a court order requiring someone to turn over documents

Enforceability

- If someone fails to respond to a subpoena, the issuer can seek the Court's help to require that they respond

TYPES OF SUBPOENAS

Deposition

- Seeks testimony under oath
- Can be issued to company for a representative, or to an individual

Documents

- Often called “duces tecum”
- Can request any stored materials, i.e. video, data files, etc.

One subpoena can request a deposition and documents.



MICHIGAN SUBPOENAS

WHAT DOES A MICHIGAN SUBPOENA INCLUDE?

- Case caption
- Party to whom subpoena is issued
- Where deposition takes place/materials are produced
- Time and place for production
- Description of the materials demanded and/or the knowledge area of the person to be deposed
 - An attachment may itemize the materials sought in more detail

See SCAO MC 11.

Approved, SCAO

Original - Return
1st copy - Witness
2nd copy - File
3rd copy - Extra

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUBPOENA Order to Appear and/or Produce	CASE NO.
--	--	----------

Court address _____ Court telephone no. _____

Police Report No. (if applicable):

Plaintiff(s)/Petitioner(s)

People of the State of Michigan

Civil Criminal

Probate In the matter of _____

In the Name of the People of the State of Michigan. TO:

If you require special accommodations to use the court because of disability

YOU ARE ORDERED TO:

1. Appear personally at the time and place stated below: You may be

The court address above Other:

Day	Date
-----	------

2. Testify at trial / examination / hearing.

3. Produce/permit inspection or copying of the following items: _____

4. Testify as to your assets, and bring with you the items listed in

5. Testify at deposition.

6. Abide by the attached prohibition against transferring or dispos

7. Other: _____

8. Person requesting subpoena _____ Telephone no. _____

Address _____

City _____ State _____

NOTE: If requesting a debtor's examination under MCL 600.6110, or an injunction under item 6, this subpoena must be issued by a judge. For a debtor examination, the affidavit of debtor examination on the other side of this form must also be completed. Debtor's assets can also be discovered through MCR 2.305 without the need for an affidavit of debtor examination or issuance of this subpoena by a judge.

FAILURE TO OBEY THE COMMANDS OF THE SUBPOENA OR TO APPEAR AT THE STATED TIME AND PLACE MAY SUBJECT YOU TO PENALTY FOR CONTEMPT OF COURT.

Date _____ Judge/Clerk/Attorney _____ Bar no. _____

MC 11 (3/15) SUBPOENA, Order to Appear and/or Produce

MCL 600.1455, 600.1701, 600.6110, 600.6119, MCR 2.506



Court use only

Served Not served

YOU ARE ORDERED TO:

1. Appear personally at the time and place stated below: You may be required to appear from time to time and day to day until excused.

The court address above Other:

Day	Date	Time
-----	------	------

2. Testify at trial / examination / hearing.

3. Produce/permit inspection or copying of the following items: _____

FAILURE TO OBEY THE COMMANDS OF THE SUBPOENA OR TO APPEAR AT THE STATED TIME AND PLACE MAY SUBJECT YOU TO PENALTY FOR CONTEMPT OF COURT.

Date _____ Judge/Clerk/Attorney _____ Bar no. _____

MC 11 (3/15) SUBPOENA, Order to Appear and/or Produce MCL 600.1455, 600

SERVICE

Service requirements

- Must be served on the party to whom it is addressed
- Notice must be provided to other parties in the case
- The deponent may be entitled to a fee for copy costs and/or appearance

Interstate Service

- Michigan subscribes to the UIDDA, which permits a an out-of-state subpoena to be “domesticated” and Michigan court rules will apply.”

RESPONDING TO A SUBPOENA

RESPONDING TO A SUBPOENA

Response deadline must be at least 14 days from the date served.
MCR 2.305(A)(3).

- You can communicate with the requesting attorney to seek an extension

Identify the materials sought

- Communicate internally to understand what materials exist to ensure you understand the scope

Consider referring the subpoena to your attorney

- Subpoenas that are too demanding, over-expansive, or seek irrelevant material may be objectionable

HANDLING PII

Sensitive information should be removed from any documents produced.

Personally Identifiable Information (PII) includes:

- social security numbers
- taxpayer identification numbers
- names of minors
- dates of birth
- financial account numbers
- home addresses
- passport numbers
- driver license numbers
- medical information*

NOTE: PII should also be removed from personnel file productions, which are discussed later in the presentation.

PRESERVING ELECTRONICALLY STORED INFORMATION

Recipients of a subpoena are required to preserve any **Electronically Stored Information (ESI)**

- ESI includes email folders, drafts, archives, voicemails, trash/recycle bins, sent items
- ESI includes information stored on devices both in-office and at home
- If any of this data is at risk of being deleted, take immediate steps to ensure that does not occur

You may also receive a **litigation hold letter** with the subpoena

- Litigation hold letters advise a client (including all its employees) not to delete information that may be relevant to a lawsuit, including information that's been subpoenaed.

TIP: Do not delete, edit, or re-organize responsive company files or data upon receipt of a subpoena. If you are concerned about particular documents that may need to be withheld due to being confidential or proprietary, for example, seek advice from your attorney.

BE COLLABORATIVE WHERE YOU CAN

Communication with the requesting attorney can be crucial

- You can often work with the requesting lawyer to agree on how and when materials will be produced, or to schedule a deposition

You may be able to save time and costs by arranging for documents to be produced electronically

- Even depositions can be done more efficiently via video conference

TIP: Any arrangements you make with the requesting attorney should be **confirmed in writing.**



SUBPOENAS IN ACTION

MOTION FOR PROTECTIVE ORDER

Scenario: You received a subpoena demanding that you produce confidential documents relating to a former employee that contain key trade secrets.

Solution: Consult your attorney to discuss filing a motion for a protective order.

A protective order can provide that discovery be limited or can set the terms of a production, including by avoiding having documents available in the public record, destroying documents at the close of litigation, and any other terms the parties agree to, or the Court sets.

PROTECTIVE ORDERS

Anatomy of a good protective order:

- Be specific in what you're seeking (i.e. nondisclosure to third parties, restricted access by personnel of a party, destruction or return of documents)
- Include a method of delineating which documents the protective order is applied to
- Describe who gets to determine what documents are confidential, and what happens if the parties disagree

MOTIONS TO COMPEL

Scenario: You received a deposition subpoena of your company's records custodian, but the deposition date was not calendared and your records custodian did not appear. The deposition was scheduled to take place over a month ago. The requesting attorney has left a voicemail and follow-up email seeking to re-schedule the deposition, but you have yet to communicate or produce your records custodian.

Possible Outcome: The requesting party files a motion to compel the deposition.

The Court can issue an order requiring the subpoenaed entity to produce the documents or appear for the deposition as subpoenaed, and in some instances you may be required to pay the requesting party's costs in bringing the motion.

MOTIONS TO QUASH OR MODIFY

Scenario: Your company is involved in a corporate dispute and has been served with a subpoena demanding that the CEO produce personal and embarrassing emails.

Solution: Consult your attorney to discuss filing a motion to quash or modify the subpoena.

The Court can issue an order which states that your client does not need to respond to an “unreasonable or oppressive” subpoena, or which limits the production that’s required to specified subjects or documents.

PRACTICE POINTERS

KEEP AN EYE ON THE DETAILS

Producing Documents

- Ask for what the requesting party wants, and make sure you are only producing what they've asked for.
- Review the list of requested materials with the requesting attorney
- Specify time periods to avoid over-producing documents

Appearing for Deposition

- Give yourself time to review materials before you get into a deposition.
- An earlier subpoena for documents in advance of a deposition subpoena can help you be prepared for an effective deposition.

GARNISHMENTS

WHAT IS A GARNISHMENT?



Generally, a garnishment is a court-approved attempt by a creditor to collect on a debt.

Employers are required to withhold wages from an employee's paycheck and transmit those wages to another source designated by the creditor.

Wage garnishments are **time-sensitive**, and failure to process the garnishment within the allotted time frame may lead to penalties.

WHAT IS A GARNISHMENT?

Situations subject to garnishment:

- Child support
- Bankruptcy
- Tax levy
- Defaulted student loans
- Consumer debts

Regardless of the type of garnishment, employees have legal rights around what an employer can and cannot do related to their income.

GARNISHMENT TERMINOLOGY

- **Garnishee:** the entity who has control over the employee's funds/assets (i.e., an employer or bank)
- **Defendant:** the individual who owes the delinquent debt to the creditor
- **Plaintiff:** the judgment creditor
- **Periodic payments:** payments made to the employee on a regular basis (ex: pay checks)
- **Non-periodic payments:** lump-sum payments (ex: bonuses not paid to the employee on a regular basis, funds held in bank accounts)

MICHIGAN GARNISHMENTS

SCAO Forms

The Michigan State Court Administrative Office (“SCAO”) has published approved forms for use during the garnishment process that are available online.

The SCAO forms discussed during today’s presentation have also been included with the outline.

Original - Garnishee (Part 1)
1st copy - Court (Part 2)
2nd copy - Defendant (Part 2)

3rd copy - Return (proof of service) (Part 2)
4th copy - Plaintiff/Attorney (proof) (Part 2)

Approved: SCAO

• STATE OF MICHIGAN
JUDICIAL DISTRICT
JUDICIAL CIRCUIT

REQUEST AND WRIT FOR GARNISHMENT
(PERIODIC)

• CASE NO.

Court address Zip code Court telephone no.

Plaintiff's name and address (judgment creditor)

Plaintiff's attorney, bar no., and address

Telephone no.

v

Defendant's name and address (judgment debtor)

Social security no. Employee ID or account no.

Garnishee name and address

REQUEST See separate instructions.

1. Plaintiff received judgment against defendant for \$ _____ on _____.

2. The total amount of judgment interest accrued to date is \$ _____. The total amount of postjudgment costs accrued to date is \$ _____. The total amount of postjudgment payments made and credits to date is \$ _____. **The amount of the unsatisfied judgment now due (including interest and costs) is \$ _____.**

3. Plaintiff knows or with good reason believes the garnishee is indebted to or possesses or controls property belonging to defendant.

4. Plaintiff requests a writ of periodic garnishment be paid to plaintiff, plaintiff's attorney, the court, and mailed to plaintiff, plaintiff's attorney, the court.

I declare under the penalties of perjury that this request has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Date Plaintiff/Agent/Attorney signature

WRIT OF GARNISHMENT IT IS ORDERED:

TO THE PLAINTIFF: Have all copies of the Garnishee Disclosure (form MC 14), two copies of this writ, and the disclosure fee (\$6 if the State of Michigan is the garnishee; \$35 for all others) served on the garnishee within 182 days from the date of issue. If not properly served, the writ of garnishment is invalid. After receiving your first payment under the garnishment, provide the garnishee and defendant a statement of the balance remaining on the judgment, including interest and costs, at least once every 6 months. Within 21 days after the judgment has been paid, including all interest and costs, provide the garnishee and defendant a garnishment release (form MC 50).

TO THE DEFENDANT: See separate instructions. You have 14 days after this writ is mailed or delivered to you to file objections with the court. If you do not file objections within this time, periodic payments (money) owed to you by the garnishee may be withheld and paid directly to the plaintiff until the judgment is satisfied.

TO THE GARNISHEE:

- Within 7 days after you are served with this writ, deliver a copy of this writ to the defendant in person or mail a copy to his or her last-known address by first-class mail.
- Within 14 days after you are served with this writ, deliver or mail copies of your completed Garnishee Disclosure (form MC14) to the court, plaintiff/attorney, and defendant. A default may be entered against you for failure to disclose.
- Do not pay any obligations to the defendant unless allowed by statute or court rule.
- If indebted to the defendant, withholding must begin according to court rule and continue until the judgment is satisfied. Unless notified that an objection has been filed, begin forwarding withheld payments 28 days after you are served with this writ.
- Make all payments withheld under this writ payable and mailed as specified in the request.
- Within 14 days after the judgment is satisfied or you are no longer obligated to make periodic payments to the defendant, file a final statement of the total amount paid on this writ with the court and mail or deliver copies to the plaintiff/attorney and defendant.

Date of issue Date of deadline for service (182 days from date of issue) Clerk of the court/Deputy

MC 12 (10/19) REQUEST AND WRIT FOR GARNISHMENT (PERIODIC) (Part 1) MCL 600.4011 of sec., MCR 3.101

ASSESSING NEW GARNISHMENTS

Is the garnishment valid?

- Served 182 days from the date it was issued
- Includes two copies of the garnishment writ (SCAO form MC 12)
- Includes all pages of the Garnishee Disclosure (SCAO form MC 14)
- Includes \$35 fee for administration
- Correctly identifies the employee by their full legal name and provides enough additional information to properly identify the employee

See MCR 3.101(F)(1), MCR 2.105, MCL 600.4012(4).

ASSESSING NEW GARNISHMENTS

“A writ of garnishment is not effective if both of the following conditions are met:

- a) The plaintiff fails to provide the garnishee with information sufficient for the garnishee to identify the defendant.
- b) The garnishee provides the court with written notice of the insufficiency described in subdivision (a).”

See MCL 600.4011(10).

TIP: Written notice can be accomplished with the Garnishee Disclosure form (MC 14).

ASSESSING NEW GARNISHMENTS

The creditor must serve the garnishment in the manner provided in MCR 2.105.

- Private Corporations – MCR 2.105(D)
- Partnerships/Limited Partnerships – MCR 2.105(C)
- LLCs – MCR 2.105(H)

An improperly served garnishment is specifically invalid and improper service cannot be waived.

See MCL 600.4012(10)(b)(ii).

REQUIRED ACTIONS

Upon being properly served with a valid garnishment, employers must:

- Provide a copy of the garnishment to the defendant **within 7 days** of being served. This can be accomplished by mailing via first class mail. **MCR 3.101(F)(2)**
- File a disclosure **within 14 days** of being served, regardless of whether the garnishment is valid. **See SCAO MC14 – “Garnishee Disclosures” Form**



Note: The disclosure form must be sent even if the person is no longer employed by you, there is no money due to the employee because of a layoff, or if no money can be withheld due to higher priority attachments or writs.

REQUIRED ACTIONS

Upon being properly served with a valid garnishment, employers must:

- Wait 28 days before transmitting withheld funds to the source designated by the creditor or as directed by the court.

See MCR 3.101(J)(1)

MAINTAINING RECORDS

- “In the case of earnings, the garnishee **shall maintain a record of all payment calculations** and shall make such information available for review by the plaintiff, the defendant, or the court, upon request.” **MCR 3.101(J)(5)**.
- Employers should track every step of the garnishment process.
- **Track dates of:**
 - when the garnishment is received
 - when any documents are received or sent during administration process
 - when any action is taken on the garnishment
- **Maintain copies of any documents received.**
 - Consistent record keeping is invaluable if legal trouble arises.

WITHHOLDINGS

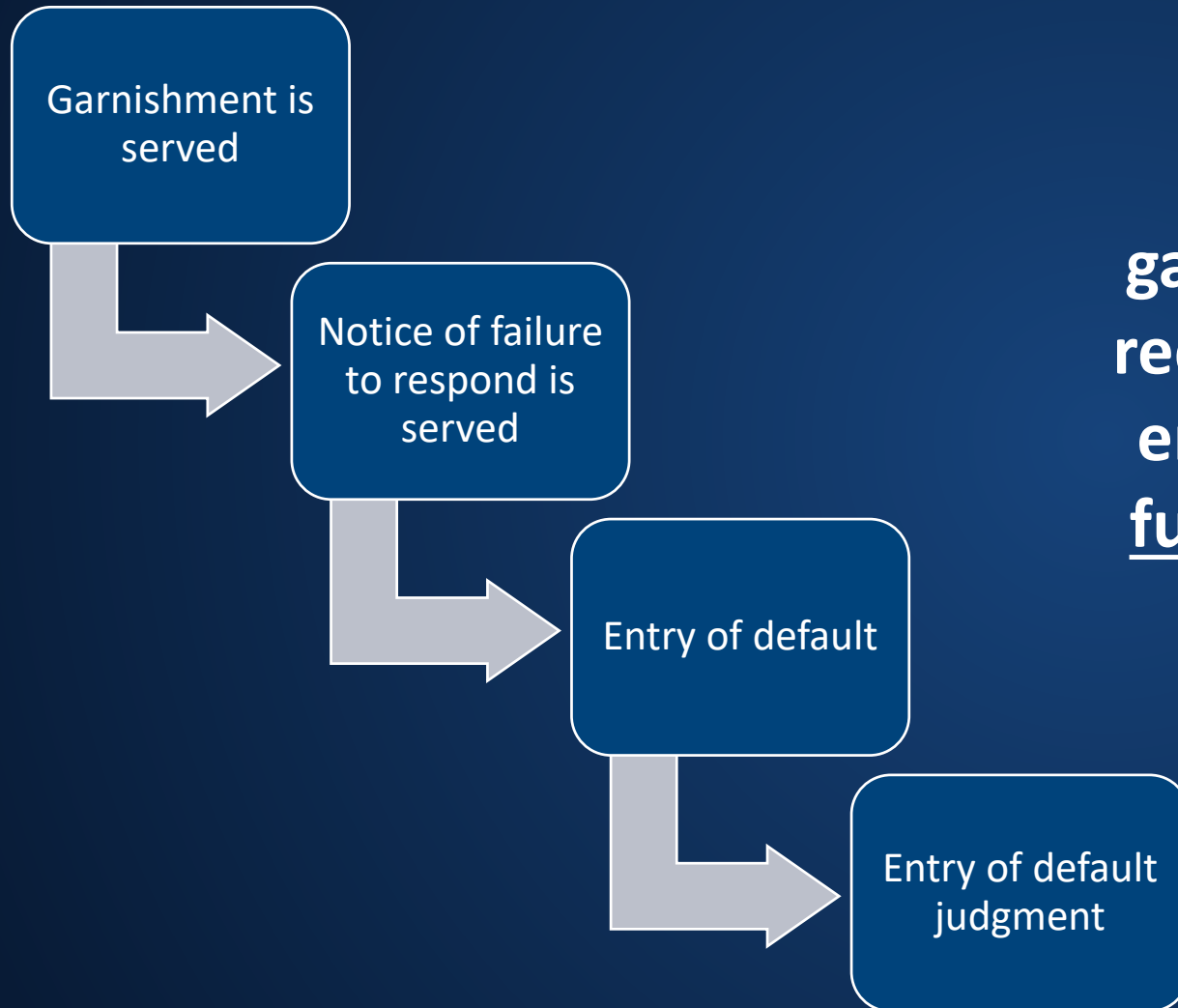
Generally, withholding from the employee's wages begins on the next full pay period.

If the employee is paid on a monthly basis, withholding begins either:

- (1) immediately, if the garnishment is served within the first 14 days of the monthly pay period, or
- (2) with the next monthly pay period, if the garnishment is served on or after the 15th day of the monthly pay period. **MCR 3.101(I)(2)**.

However, do not **remit** withheld funds to the court or creditor until after 28 days have passed from the date of service of the garnishment. **MCR 3.101(J)(1)**.

PENALTIES FOR FAILURE TO RESPOND OR COMPLY



Failure to respond to a garnishment or do any other act required by the court subjects an employer to a judgment for the full amount of the garnishment.

DISSOLVING A GARNISHMENT

An employer may stop withholding when:

- the full amount of the judgment listed on the garnishment has been withheld; or
- The creditor provides a release of garnishment, which must be provided by the creditor within 21 days after the judgment is satisfied. See SCAO form MC 50; MCL 600.4012(5)(b).

Note: Michigan periodic/wage garnishments remain in place until a **final statement** is filed.

FINAL STATEMENTS

Michigan periodic/wage garnishments remain in place until a final statement is filed.

An employer must provide a final statement within 14 days of:

1. the judgment being satisfied or
2. the employer no longer being obligated to make periodic payments (e.g., employee has been terminated)

See SCAO Form MC48 – “Final Statement on Garnishment of Periodic Payments”; MCR 3.101(J)(6).

Approved: SCAO	Original - Court 1st copy - Plaintiff	2nd copy - Defendant 3rd copy - Garnishee
STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT	FINAL STATEMENT ON GARNISHMENT OF PERIODIC PAYMENTS	CASE NO.
Court address		Court telephone no.
Plaintiff's name and address (judgment creditor)	v	Defendant's name and address (judgment debtor)
Plaintiff's attorney, bar no., address, and telephone no.		Garnishee's name and address

When to complete and file this form:

Within 14 days after the writ ceases to be effective under MCR 3.101(B)(1) or after the garnishee is no longer obligated to make periodic payments, the garnishee shall file with the court and mail or deliver to the plaintiff and the defendant a final statement of the total amount paid on the writ. If the garnishee is the defendant's employer, the statement is to be filed within 14 days after the writ ceases to be effective, regardless of changes in employment status during the time that the writ was in effect.

1. The total amount withheld under this writ is \$ _____.

Date of statement _____ Garnishee/Agent/Attorney signature _____

CERTIFICATE OF MAILING

I certify that on:

_____ I mailed or personally delivered a copy of this final statement with the court.
Date _____

_____ I mailed or personally delivered a copy of this final statement to the plaintiff/attorney.
Date _____

_____ I mailed or personally delivered a copy of this final statement to the defendant.
Date _____

_____ Garnishee/Agent/Attorney signature _____
Date _____

MC 48 (4/18) FINAL STATEMENT ON GARNISHMENT OF PERIODIC PAYMENTS 15 USC 1672, 15 USC 1673, MCR 3.101(J)(6)

PRACTICE TIPS

Establish procedures for handling subpoenas across your facilities.

Contact the court that issued the garnishment to get information about the case and filing information. Some district courts allow for electronic filing or “e-filing.”

Call the attorney of the creditor that requested the garnishment.

Alert your employee in writing when you receive a garnishment.

- Example: a letter detailing the specifics of the wage garnishment order, the amount to be taken from each payment, and the length of time the wages will be garnished

Notify your HR/payroll department so they can start the wage garnishment process and ensure that payments are sent to the appropriate agency or creditor.

PERSONNEL FILE RECORDS

WHAT IS A “PERSONNEL RECORD”

“...a record kept by the employer that identifies the employee, to the extent that the record is used or has been used, or may affect, or be used relative to that employee’s qualifications for employment, promotion, transfer, additional compensation, or disciplinary action.”

Michigan’s Bullard-Plawecki Employee Right-to-Know Act (“B-PERKA”), MCL §423.501(2)(c)

BULLARD-PLAWECKI EMPLOYEE RIGHT-TO-KNOW ACT

“B-PERKA”

- Allows employees to review, copy and correct personnel record information
- Applies to “records,” including digital files that are stored electronically
- Applies to employers with 4 or more employees
- Requires a written request to view/obtain a copy of a personnel file
- Employees can review or obtain personnel records at reasonable intervals, generally not more than twice a year

BULLARD-PLAWECKI EMPLOYEE RIGHT-TO-KNOW ACT

- Today's discussion will apply to Michigan's statute on personnel files, only.
- Other states may have their own unique laws on personnel files and employers who operate in multiple states will want to be aware of the nuances.

WHAT TO INCLUDE IN PERSONNEL FILES

- Most pre-employment submissions:
 - Employment applications
 - Resumes
 - Letters of reference
- Performance evaluations
 - Annual/mid-year reviews
 - Employee self-reviews
- Disciplinary records
 - Counseling/corrective action notices/write-ups
 - Emails IF used for documentation purposes (*example: documenting a verbal warning*)

WHAT TO INCLUDE IN PERSONNEL FILES

- Records relating to job status
 - job classification
 - Changes to job classification (promotion, demotion, or lateral move)
- Records relating to wage status
 - Wage/salary status
 - Changes to wage/salary status
 - I-9 or W-4
 - *NOTE: this category does **NOT** include payroll information or copies of paystubs*
- Other performance management records
 - Trainings
 - Certifications

WHAT NOT TO INCLUDE IN A PERSONNEL FILE

The following should be stored separately from the personnel file:

- Medical documents, including:
 - Medical records of employee or employee's dependents
 - Medical leave forms and supporting documents
 - Work-related injury or illness forms and supporting documents
 - Disability-related documentation, including requests for accommodation
- Personal information that relates to a person other than the employee, if it would invade the other person's privacy

WHAT NOT TO INCLUDE IN A PERSONNEL FILE

The following should be stored separately from the personnel file:

- Staff planning materials that include information about more than one employee
- Employee references that reveal the identity of the maker
- Materials related to a formal grievance investigation
- Information relating to an investigation of possible criminal activity by the employee
- Education records maintained by an educational institution (these are different from student employment records)

WHAT NOT TO INCLUDE IN A PERSONNEL FILE

Employers may not maintain records about an employee's non-job related personal associations, political activities, publications or communications of non-employment activities without employee's authorization.

FAILING TO PROPERLY MAINTAIN A PERSONNEL FILE

- Employer will be prohibited from using the improperly excluded documents in a judicial or quasi-judicial proceeding.
 - Lawsuit
 - Arbitration
 - Discrimination charge
 - Other legal challenge
- Employer may need to use all of the documents in defense

PROCEDURE FOR ACCESSING A PERSONNEL FILE

B-PERKA outlines a step-by-step process for reviewing or obtaining a copy of a personnel file

- reviewing records - MCL §423.503
- obtaining a copy of records - MCL §423.504

General procedure:

- written request submitted to employer
- Appointment scheduled
- employee reviews records
- employee requests copies

PROCEDURE FOR ACCESSING A PERSONNEL FILE

B-PERKA outlines a step-by-step process for reviewing or obtaining a copy of a personnel file

- reviewing records - MCL §423.503
- obtaining a copy of records - MCL §423.504

General procedure:

- written request submitted to employer
- Appointment scheduled
- employee reviews records
- employee requests copies

DISCLOSURES TO THIRD PARTIES

An employer or former employer cannot divulge a disciplinary report, letter of reprimand or other disciplinary action to a third party without written notice to the employee.

Written notice must be provided by first class mail to the employee's last known address and mailed on or before the day the information is disclosed from the personnel file. [MCL 423.506](#).

Exceptions:

- a) The employee has specifically waived written notice as part of a written, signed employment application with another employer.
- b) The disclosure is ordered in a legal action or arbitration to a party in that legal action or arbitration.
- c) Information is requested by a government agency as a result of a claim or complaint by an employee.

ORGANIZING PERSONNEL FILES

File content can be grouped by subject matter:

- Performance-related
- Compensation
- Benefits
- Hiring documents
- Trainings

Advantages:

- Related documents are stored together
- Easier to create a timeline of actions within each category

Breakfast **Bites**®

QUESTIONS

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