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ROBERT J. GOODMAN
TIMOTHY J. FROST

LLPS, Inc
Attn: Joseph Fata
6323 W Saginaw Hwy Ste E
Lansing MI 48917

February 22, 2023

Re: Ella E.M. Brown Charitable Circle DBA Oaklawn Hospital vs. Meghan A Blowers
Case No. 224856GC
Our File# 22E00428

Dear Sir/Madam:

Please find enclosed Plaintiff's First Set of Interrogatories and Request to Produce, as it pertains to the above named defendant.

If you have any questions, please feel free to contact us at 248-750-0500, Ext. 705 or garnishments@goodmanfrost.com. Thank you in advance for your prompt attention to this matter.

Very truly yours,

Goodman Frost, PLLC

T Frost @ goodmanfrost.com

STATE OF MICHIGAN
IN THE 10TH DISTRICT COURT

ELLA E.M. BROWN CHARITABLE
CIRCLE DBA OAKLAWN HOSPITAL,

Case No. 224856GC

Plaintiff,

Hon.

vs.

MEGHAN A BLOWERS,

Defendant,

and

LLPS, INC,

Garnishee Defendant.

GOODMAN FROST, PLLC
Robert J. Goodman (P55670)
Timothy J. Frost (P40616)
Attorneys for Plaintiff
20300 W. 12 Mile Rd., Ste. 101
Southfield, MI 48076
888/593-0088

LLPS, INC
Garnishee Defendant
6323 W Saginaw Hwy Ste E
Lansing MI 48917

**PLAINTIFF'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
TO GARNISHEE DEFENDANT LLPS, INC**

NOW COMES Plaintiff, through its attorneys, Goodman Frost, PLLC, pursuant to MCR 3.101 (L)(1), 2.309 and 2.310, and submits the following First Interrogatories and Requests for Production of Documents to Garnishee Defendant:

Under the Michigan Court Rules, the Writ of Garnishment operates as the Complaint in the garnishment action, and the Garnishee's Disclosure serves as its Answer to the Complaint. MCR 3.101(M)(2) The rules of discovery apply to garnishment proceedings. MCR 3.101(L)(3) You have twenty eight (28) days to respond to these requests.

The Answers to these Interrogatories must be signed *under oath, before a notary public*, by an authorized representative of Garnishee Defendant.

When referred to herein, the "Writ of Garnishment" shall mean the Writ of Garnishment which was served upon Garnishee Defendant in this case.

When referred to herein, the "Garnishee Disclosure" shall mean the garnishee disclosure which was served by Garnishee Defendant in this case.

For purpose of this request, the terms, "document" and "documentation", has their customary broad meanings and includes, without limitation, the following items, whether printed, recorded, or reproduced by any other mechanical process or written or produced by hand: all information kept on computers of any kind; agreements; communications, including intra-company communications; correspondence; letters; telegrams; telexes; memoranda; notebooks; summaries or records of telephone conversations; summaries or records of personal conversations or interviews; diaries; statistical statements; graphs; laboratory and engineering reports and notebooks; charts; plans; drawings; minutes or records of meetings; minutes or records of conferences; expressions or statements of policy; lists of persons attending meetings or conferences; expressions or statements of policy; lists of persons attending meeting or conferences; reports and/or summaries of interviews or investigations; opinions or reports of consultants; opinions of counsel; records, records, reports, or summaries of negotiations; photographs; brochures; pamphlets; advertisements; circulars; trade letters; press releases; drafts of any documents; original or preliminary notes; marginal comments appearing on any documents; stenographic or stenotype notes; any voice or video recording whether on a tape or a record; computer printouts; and other data compilations from which information can be obtained and translated, if necessary, into reasonably usable form by the respondent through detection devises, printouts of computer screens and/or information/data kept on computer systems of any kind, and e-mails which are responsive to the following requests.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please identify by name, position, and provide the phone number of the individual(s) providing responses to these discovery requests.

ANSWER:

2. Please identify by name and position the individual who signed the garnishee disclosure.

ANSWER:

3. Please state the following information:

- a. The approximate inclusive dates during which Defendant is/was employed with you and/or provided labor and/or services to you;
- b. Whether Defendant was/is paid weekly, biweekly, semi-monthly or monthly by the Garnishee Defendant;
- c. Whether Defendant is/was an employee or an independent contractor of Garnishee Defendant, and state the approximate inclusive dates during which the Defendant was an employee or an independent contractor;
- d. Whether Defendant was/is salaried or paid on an hourly basis;
- e. A brief description of Defendant's last job title and/or duties.

ANSWER:

4. Please produce an itemization of the following regarding Defendant's earnings for each full pay period from six months prior to the date of the Garnishee Disclosure OR the last six months the debtor was active, whichever one is later, to the date on which you provide answers to these requests:

- a. Gross earnings;
- b. Federal withholding tax (for income tax);
- c. State withholding tax (for income tax);
- d. Employee portion of social security tax;
- e. Employee portion of medicare tax;
- f. City income tax, if applicable;
- g. Orders for past due federal or states taxes;
- h. Withholdings pursuant to any order or writ which you claim is of higher priority than Plaintiff's writ;
- i. All other deductions.
- j. Net earnings;
- k. Disposable earnings;

ANSWER:

5. Please produce any documents(s) reflecting an itemization of the deductions referenced in the response to the immediately Preceding request.

ANSWER:

6. Please identify by name and routing number each financial institution(s) into which earnings were directly deposited with regard to the two (2) most recent occasions.

ANSWER:

7. Please produce a copy of the most recent authorization form signed by Defendant authorizing the direct deposit of earnings into a bank account, if any.

ANSWER:

8. Please produce copies of the last two (2) checks, both front and reverse sides, issued by, on, or behalf of Garnishee Defendant to Defendant, for any reason.

ANSWER:

9. Please produce a copy of each order or writ which you claim was of a higher priority than Plaintiff's writ and the corresponding garnishee disclosure served or filed in

response to each such order or writ.

ANSWER:

10. If you claim that other writ(s) or order(s) were of higher priority than Plaintiff's writ at any time, please state with regard to each other writ or order:


- a. The identity and address of the Plaintiff or claim amount on the writ or order;
- b. The case number or file number of the writ or order.
- c. The identity of the court; if any from which the writ or order was issued;
- d. Include the inclusive effective dates of the writ or order.
- e. The date on which you received the writ or order.
- f. The inclusive dates during which you withheld and or remitted funds pursuant to such writ or order
- g. The dates and amounts of all sums withheld and or remitted pursuant to the writ or order.
- h. The total amount which you have withheld and or remitted on each such writ or order.
- i. The balance which you show remaining on each higher priority writ or order, and the date of said balance.

ANSWER:

11. Please produce a copy of the W-2 form or 1099 form issued by Garnishee Defendant to Defendant for each of the last two (2) tax years.

ANSWER:

Respectfully Submitted,


GOODMAN FROST, PLLC
Robert J. Goodman (P55670)
Timothy J. Frost (P40616)
Attorneys for Plaintiff

Dated: February 22, 2023



STATE OF MICHIGAN
IN THE 10TH DISTRICT COURT

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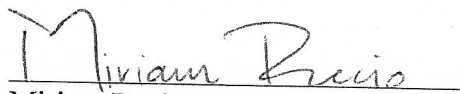
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PROOF OF SERVICE

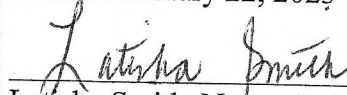
STATE OF MICHIGAN)
) SS:
COUNTY OF OAKLAND)

The undersigned hereby certifies that on February 22, 2023, she sent by first class mail a copy of First Interrogatories and Requests for Production of Documents to Garnishee Defendant LLPS, Inc to:

LLPS, INC
c/o Joseph Fata
6323 W Saginaw Hwy Ste E
Lansing MI 48917


Miriam Recio

Subscribed and sworn to before me
on this February 22, 2023


Latisha Smith, Notary Public

State of Michigan, County of Wayne

Acting in Oakland County

My Commission Expires: August 25, 2027