

STATE OF MICHIGAN

IN THE 10<sup>TH</sup> DISTRICT COURT FOR THE COUNTY OF CALHOUN

ELLA E.M. BROWN CHARITABLE  
CIRCLE d/b/a OAKLAWN HOSPITAL,

Plaintiff,

vs.

Case No: 22-4856-GC

MEGHAN BLOWERS,

Hon.

Defendant,

and

LLPS, INC.,

Garnishee Defendant.

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

**PRELIMINARY STATEMENT AND OBJECTION**

Plaintiff Ella E.M. Brown Charitable Circle d/b/a Oaklawn Hospital ("Plaintiff") served LLPS, Inc. ("LLPS") its First Set of Interrogatories and Requests for Production of Documents to Garnishee Defendant LLPS, Inc. on or about February 22, 2023 pursuant to MCR 3.101(L). While MCR 3.101(L) does permit Plaintiff to issue interrogatories, there is no such allowance for requests for production. Therefore, LLPS objects to Plaintiff's "Requests for Production" as improper. Further, LLPS clearly indicated in its Garnishee Disclosure dated February 17, 2023 that Defendant Meghan Blowers "does not work for the company." This statement is correct, and Defendant Blowers has not worked for LLPS since July 16, 2021. Pursuant to MCR 2.625(E), LLPS reserves all rights to its costs and fees and any other remedies under Michigan law should Plaintiff pursue this matter as contemplated in MCR 3.101(M).

NOW COMES Garnishee Defendant, LLPS, Inc., by and through its attorneys, Plunkett Cooney, and for its Answers to Plaintiff's First Interrogatories and Requests for Production of Documents states as follows:

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

**ANSWER:**

**Michael Bishop, with assistance of counsel, Peter D. Cronk. Mr. Bishop can be contacted through counsel at 517.324.5611.**

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

**ANSWER:**

**Michael Bishop**

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:**

- a. **1.23.14 to 2.26.15 and 8.17.18 to 7.16.21.**
- b. **Weekly**
- c. **Employee**
- d. **Hourly**
- e. **Call Center, Assistant Manager**

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 state 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:**

**From January 1, 2021 to July 16, 2021, Defendant's earnings were as follows:**

- a. **\$14,139.15**
- b. **\$742.97**
- c. **\$600.88**
- d. **\$876.63**
- e. **\$205.02**
- f. **N/A**
- g. **N/A**
- h. **N/A**
- i. **\$11,713.65**
- j. **Unknown**

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

**ANSWER:**

**LLPS objects to this Request as outside the scope of MCR 3.101(L).**

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:**

**LLPS did not utilize direct deposit in connection with Defendant Blowers.**

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:**

**LLPS objects to this request as outside the scope of MCR 3.101(L).**

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

**ANSWER:**

**LLPS objects to this request as outside the scope of MCR 3.101(L).**

9. Please produce a copy of each order of 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:**

**LLPS objects to this request as outside the scope of MCR 3.101(L). Despite this objection, there are no other writs and Defendant Blowers is not employed with LLPS.**

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; and
  - i. The balance which you show remaining on each higher priority writ or order, and the date of said balance.

**ANSWER:**

**See Answer to Request No. 9. Not applicable.**

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) years.

**ANSWER:**


**LLPS objects to this request as outside the scope of MCR 3.101(L).**

**LLPS, INC.**

Dated: March 20, 2023

  
By: Michael Bishop

On this 20 day of March, 2023, personally appeared before me, the above-named Michael Bishop, being first duly sworn, deposes and says that he has read the foregoing Garnishee Defendant, LLPS, Inc.'s Answer to Plaintiff's First Interrogatories and Requests for Production of Documents by him subscribed and that the same are true to the best of his knowledge, information and belief, except as to those answers which have been prepared based upon information provided by others and, as to those answers, he believes the same to be true.

  
\_\_\_\_\_, Notary Public  
Eaton County, Michigan  
Acting in Eaton County, Michigan  
My Commission Expires: March 9, 2025

**PLUNKETT COONEY**



Dated: March 20, 2023

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this \_\_\_\_ day of \_\_\_\_\_, 2023, I served a copy of the foregoing to all counsel of record via first-class mail, at the email addresses listed below:

Robert J. Goodman  
Timothy J. Frost  
Attorneys for Plaintiff  
Goodman Frost, PLLC  
20300 W. 12 Mile Road, Suite 101  
Southfield, MI 48076

\_\_\_\_\_  
Laura L. Robbins