

**IN THE STATE OF MICHIGAN
IN THE SUPREME COURT**

State Representative Tenisha Yancey, State of MI, Detroit Caucus Chair, House District 1, Former State Representative & Detroit Caucus Chair Sherry Gay-Dagnogo, M.Ed., DPSCD Board Member, Senator Betty Jean Alexander, Senate District 5, Former State Rep. Teola P. Hunter, First Female Speaker Pro Tem, Romulus City Council Member Virginia Williams, Vice Pro Tem, Hon. Keith Williams, Chair MDP Black Caucus, Natalie Bienaime, Citizen the 13th District, Dr. Carol Weaver, 14th Congressional District Executive Board Member, State Representative Tyrone Carter, District 6, Vice Chair Detroit Caucus State Rep., Helena Scott, District 7 State Rep., Stephanie Young, 8th District, Rep. Mary Cavanagh, 10th District,

Supreme Court Case No.

Jurisdiction:

VERIFIED COMPLAINT

Plaintiffs,

v.

INDEPENDENT CITIZENS
REDISTRICTING COMMISSION,

Defendant.

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VERIFIED COMPLAINT

NOW COMES, the above-named Plaintiffs (hereinafter "Plaintiffs"), by and through their attorneys at Ayad Law, PLLC, and hereby make the following complaint:

INTRODUCTION

1. On November 6, 2018, Michiganders voted to amend the Michigan Constitution of 1963 to create the Michigan Redistricting Commission (hereinafter "Defendant" or "the Commission").
2. After being created, the Commission has maintained that its mission and vision are:

Mission: To lead Michigan's redistricting process to assure Michigan's Congressional, State Senate, and State House district lines are drawn fairly in a citizen-led, transparent process, meeting Constitutional mandates.

Vision: To chart a positive course for elections based on fair maps for Michigan today and for the future.

(See <https://www.michigan.gov/micrc/0,10083,7-418-92033---,00.html>, last visited January 3, 2022, emphasis in original.)

3. This Supreme Court has already ruled that the Commission failed in its self-stated mission of 'transparency' when on December 20, 2021, it ruled that the Commission had violated Michigan's Open Meetings Act, and ordered the commission to make public the meetings they had been having in private.
4. On December 28, 2021, the Commission officially approved its redistricting maps (or "Plans") for the state of Michigan's Congressional, State Senate, and State House district voter districts.
5. It is clear from the Commission's current proposed Plans that they will also be falling woefully short of their vision: "To chart a positive course for elections based on fair maps for Michigan today and for the future."

6. Michigan Redistricting Commission was sold to the Michigan voter as a means of reducing gerrymandering in the redistricting of Michigan's voter districts following the 2021 census. However, the idea of an impartial, non-discriminatory, non-racist redistricting plan has been shattered by the revelation of the Michigan Redistricting Commissions Plans.
7. The new Plans, with their new voting district maps, were backed by eight out of thirteen of the randomly selected voters who serve on the commission.
8. **Should the Plans be adopted, it would completely eliminate the two majority-minority (Black) districts that currently run through Detroit. Instead, those districts would be apportioned into eight new districts comprised of eight small sections of Detroit, each paired with a large section of a Detroit suburb.**
9. **Each of the new eight districts would be majority-White.**
10. Such redistricting would completely rob the Black minority of Southeastern Michigan, and therefore the City of Detroit, of its ability to elect their chosen representatives into office.
11. This practice of splintering a majority-minority voter district is termed "dilution" and has long been banned by federal law pursuant to the Voting Rights Act of 1965.
12. The Voting Rights Act of 1965 was the first federal legislation to outlaw intimidation and other barriers to voting of African Americans and other racial minorities. Since that victory of the Civil Rights Movement, Black Americans have had the highest voting rate of any racial group in the nation.¹
13. The Commission's redistricting is a blatant and obvious "retrogression" of the national and Michigan Civil Rights Movement and sets-back the Black population of Michigan generations by undoing the hard-fought representation achieved by Detroiters and the Black community in Michigan over the last 70 years.

¹ https://www.census.gov/newsroom/blogs/random-samplings/2017/05/voting_in_america.html

14. As the United States Supreme Court has stated:

The maintenance of existing district boundaries is advantageous to both voters and candidates. Changes, of course, must be made after every census to equalize the population of each district or to accommodate changes in the size of a State's congressional delegation. Similarly, changes must be made in response to a finding that a districting plan violates § 2 or § 5 of the Voting Rights Act, [52 USCA §§ 10301, 10304(b, d)]. But the interests in orderly campaigning and voting, as well as in maintaining communication between representatives and their constituents, underscore the importance of requiring that any decision to redraw district boundaries—**like any other state action that affects the electoral process—must, at the very least, serve some legitimate governmental purpose.** See, e.g., *Burdick v. Takushi*, 504 U.S. 428, 434, 440, 112 S.Ct. 2059, 119 L.Ed.2d 245 (1992); *id.*, at 448–450, 112 S.Ct. 2059 (KENNEDY, J., joined by Blackmun and STEVENS, JJ., dissenting).

League of United Latin Am Citizens v Perry, 548 US 399, 448; 126 S Ct 2594, 2626–27; 165 L Ed 2d 609 (2006) (emphasis added).

15. Here, the destruction of Detroiters and Black voters ability to elect their preferred representatives and/or minority candidates could serve no legitimate government purpose, and therefore, it violates Michigan Constitution, the United States Constitution, and the Voting Rights Act of 1965.

THE PARTIES

16. Plaintiffs are all African-American, and residents of city of Detroit, MI, besides Plaintiff Hunter, who resides in Romulus, MI.

- a. State Representative Tenisha Yancey, State of MI, Detroit Caucus Chair, House District 1, resident of Michigan;
- b. Former State Representative & Detroit Caucus Chair Sherry Gay-Dagnogo, M.Ed., DPSCD Board Member, resident of Michigan;
- c. Senator Betty Jean Alexander, Senate District 5, resident of Michigan;
- d. Former State Rep. Teola P. Hunter, First Female Speaker *Pro Tem*, resident of Michigan;

- e. Romulus City Council Member Virginia Williams, *Vice Pro Tem*, resident of Michigan;
- f. Hon. Keith Williams, Chair MDP Black Caucus, resident of Michigan;
- g. Natalie Bienaime, Citizen the 13th District, resident of Michigan;
- h. Dr. Carol Weaver, 14th Congressional District Executive Board Member, resident of Michigan;
- i. State Representative Tyrone Carter, District 6, Vice Chair Detroit Caucus, resident of Michigan;
- j. State Rep., Helena Scott, District 7, resident of Michigan;
- k. State Rep., Stephanie Young, 8th District, resident of Michigan;
- l. Rep. Mary Cavanagh, 10th District, resident of Michigan.

17. Defendant Independent Citizens Redistricting Commission (“ICRC”) is a permanent commission in the legislative branch of government. Const 1963, art 4, § 6(1).

JURISDICTION

- 18. The Court has original subject-matter jurisdiction over this action under Article IV, Section 19, of the Michigan Constitution of 1963.
- 19. The Court also has subject-matter jurisdiction under Section 217(3) of the Revised Judicature Act, MCL 600.217(3), and Michigan Court Rules 3.301(A)(1)(c) and (g) and Michigan Court Rule 3.305(A)(2).
- 20. The Court has general personal jurisdiction over Plaintiffs under Section 701(3) of the Revised Judicature Act, MCL 600.701(3).
- 21. The Court has general personal jurisdiction over the Commission under Section 2051(4) of the Revised Judicature Act, MCL 600.2051(4).

FACTUAL BACKGROUND

22. According to the U.S. Census Bureau, Black or African Americans living in Detroit accounted for 79.1% of the total population, or approximately 532,425 people as of 2017 estimates.²
23. According to the 2000 U.S. Census, of all U.S. cities with 100,000 or more people, Detroit had the second-highest percentage of Black people.³
24. Biden won the city of Detroit with 94% of the vote while Trump received 5%, according to the city of Detroit's election results.⁴
25. Yet statewide in Michigan, Biden defeated Trump by merely 50.6% to 47.9% (voter turnout was 71%).
26. These numbers make undeniably clear that the Black population of Detroit, Michigan, is a community of interest, which has its own preferred political candidates and which, when districts are mapped fairly, has the power to elect the representatives of their choice.
27. Michigan voters supported establishing an Independent Citizens Redistricting Commission in 2018 on the premise it would eliminate “gerrymandering” in the creation of legislative and congressional districts in the State.
28. Initially, the Independent Redistricting Commission stated that they would work to develop fair, non-partisan leaning legislative and congressional districts. Secondly, and more strongly, the Commission indicated they would respect and protect communities of interest.
29. From review of their draft plans, it is clear that the Commission has failed in both of these regards.

² <https://www.census.gov/quickfacts/fact/table/detroitcitymichigan,mi/PST045217>

³ Race and Ethnicity in the Tri-County Area: Selected Communities and School Districts; See also From a Child's Perspective: Detroit Metropolitan Census 2000 Fact Sheets Series. Wayne State University. June 2002. Volume 2, Issue 2. p. 1. Retrieved on November 10, 2013.

⁴ <https://www.freep.com/story/news/politics/elections/2020/11/06/joe-biden-detroit-michigan-vote-election-2020/6168971002/>

30. Two of the largest communities of interest in Michigan are the Black population and the City of Detroit.
31. Although the Commission indicated they planned to protect communities of interest, they produced a Senate Plan that divided Detroit into eight pieces.
32. Of those eight pieces, not one Senate District as a whole contained the City of Detroit, but instead, sections of Detroit are apportioned to other, majority-White polities including: Bloomfield Hills, Birmingham, Canton, Farmington, Madison Heights, New Baltimore, Sterling Heights, and Clinton Township.
33. The redistricting plans of the Michigan Independent Redistricting Commission are bipartisan gerrymandering which, if implemented, would unlawfully reduce the voting power of minority racial groups to elect the candidate of their choosing.
34. The reduction of majority-minority districts from the plans previously adopted in 2011 can be plainly seen by the results of the redistricting on the representation of Black voters and the citizens of City of Detroit.

Examples of Retrogression: 2011 to 2021

35. *Congressional Plans*

- 2011 Plans contain 2 (two) majority Black wards
- 2021 Plans contain 0 (zero) majority Black wards

36. *State Senate Plans*

- 2011 Plans contain 5 (five) majority Black wards
- 2021 Plans contain 0 (zero) majority Black wards

37. *State House Plans*

- 2011 Plans contain 12 (twelve majority) Black wards
- 2021 Plans contain 2 (two) majority Black wards

Examples of Cracking: 2011-2021

38. *City of Detroit*

- Total population 2021 = 639,111
- Average Population of State Senate District 2021 = 265,193

39. *Number of Majority Wards Possible in the City of Detroit*

- Completely contained = 2.41
- Partially contained = 4.73
- Defendant's plan has eight State Senate Districts occupying the City of Detroit which dilutes the city's voting power and potentially eliminates any State Senator from Detroit in 2023.

COUNT I

**Violation of Mich Const 1963, art 4, §6(13)(a) and (c):
Dilution of Minority Voting Power**

40. Plaintiffs reallege the prior paragraphs as if restated fully hereunder.

41. The Michigan Constitution of 1963 provides:

(13) The commission shall abide by the following criteria in proposing and adopting each plan, in order of priority:

(a) Districts shall be of equal population as mandated by the United States constitution, and shall comply with the **voting rights act [of 1965]** and other federal laws.

Mich Const 1963, art 4, §6(13)(a) (emphasis added).

42. The Voting Rights Act of 1965 holds, in pertinent part:

No voting qualification or prerequisite to voting or standard, practice, or procedure shall be imposed or applied by any State or political subdivision in a manner which results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color...

52 USCA § 10301.

43. In determining whether the Voting Rights Act statute has been violated, this Court follows "the guidance of the United States Supreme Court, [as] stated in *Thornburg v. Gingles*, 478 U.S. 30, 43–46, 106 S.Ct. 2752, 2762–2764, 92 L.Ed.2d 25 (1986)..." *In re Apportionment of State Legislature-1992*, 439 Mich 715, 735; 486 NW2d 639, 650 (1992).
44. In *Thornburg v. Gingles*, 478 U.S. 30, 43–46, 106 S.Ct. 2752, 2762–2764, 92 L.Ed.2d 25 (1986), Supreme Court of the United States has held that a successful Section 2 vote dilution claim has two components. First, a plaintiff must satisfy three preconditions by showing: (1) that the minority group is "sufficiently large and geographically compact to constitute a majority in a single-member district": (2) that the minority group is "politically cohesive": and (3) that bloc voting by other members of the electorate usually defeats the minority-preferred candidates. Satisfaction of these three preconditions is necessary but not sufficient to establish liability. Second, "[i]f these three preconditions are met, the district court must then examine a variety of other factors to determine whether, under the totality of the circumstances, the challenged practice impairs the ability of the minority voters to participate equally in the political process and to elect a representative of their choice." As stated in *Gingles*, 478 U.S. at 36-37, additional "objective factors" used in determining the "totality of circumstances" surrounding an alleged violation of Section 2 of the Voting Rights Act include (but are not limited to) the extent to which the members of the minority group bear the effects of discrimination in areas like education, employment, and health, which hinder effective participation, is one measure.
45. (1) The Black citizens of the City of Detroit are a minority group that is "sufficiently large and geographically compact to constitute a majority in a single-member district" as its population is 77.7% Black as per the 2020 census.

46. (2) The Black citizens of the City of Detroit are “politically cohesive” as is shown by their voting record where Detroit Black persons account for 79.1% of the total population of Detroit.⁵ Biden won the city of Detroit with 94% of the vote while Trump received 5%.⁶ Yet statewide in Michigan voter turnout was 71% and Biden defeated Trump by merely 50.6% to 47.9%, meaning that it was the Detroit Black community who, voting as a cohesive group, won the Presidential election for President Joseph Biden in this State and, potentially, the Country.
47. (3) Bloc voting by other members of the electorate usually defeats the minority-preferred candidates: Until the 1954 election of Charles Diggs in the old 15th District (13th today) followed by the election of John Conyers 10 years later in 1964 in the old 1st District (14th today) Detroit’s majority-minority community could not elect a Congressional candidate of their choice.
48. The Black citizens of the City of Detroit bear the effects of discrimination in the area of education:
- a. In the city of Detroit the majority of the residents in the suburb area are predominantly White, while in the actual city majority of the residents are Black.⁷
 - b. As of the mid-2000's, school funding per pupil in Wayne County (where Detroit is located) was approximately \$930.33, the lowest in the State. The second highest was \$1,239.47 per pupil, in Macomb County, almost 50% more than that of Wayne County and far below the average for Southeastern Michigan of \$1,807.17.⁸

⁵ <https://www.census.gov/quickfacts/fact/table/detroitcitymichigan,mi/PST045217>

⁶ <https://www.freep.com/story/news/politics/elections/2020/11/06/joe-biden-detroit-michigan-vote-election-2020/6168971002/>

⁷ Checkoway, Barry; Lipa, Todd; Vivyan, Erika; Zurvalec, Sue (2017). "Engaging Suburban Students in Dialogues on Diversity in a Segregated Metropolitan Area". *Education and Urban Society*. Sage Journals. 49 (4): 388–402.

⁸ D., Rollandini, Mark. Michigan intermediate school districts: funding and resource allocation. p. 22.

- c. Detroit public schools have high illiteracy rates and low academic performance compared to cities across the United States, with Detroit "eighth graders scor[ing the] lowest in math and reading in the nation."⁹
- d. According to the National Institute for Literacy, 47% (200,000) of adults in Detroit are functionally illiterate, and half of the 200,000 adults do not have a high school diploma or GED, showing that the lack of these skills learned in an academic setting is generationally embedded into different groups of society.

49. The Black citizens of the City of Detroit bear the effects of discrimination in the area of employment:

- a. Detroiters have a lower employment rate compared to others living in Wayne County and those in neighboring counties such as Macomb and Oakland. In July 2020, unemployment in Detroit reached nearly 40 percent.¹⁰ This is much higher than the national unemployment average of even The Great Depression nearly a century ago.¹¹
- b. As of 2016, Detroit's poverty rate was 35.7%, with a median household income of just over \$28,000.¹²

50. The Black citizens of the City of Detroit bear the effects of discrimination in the area of health:

⁹ Rosenbaum, Mark (2018-01-30), The Miseducation of America, Center for Political Studies (CPS).

¹⁰ Wileden, Lydia. 2020. "employment Dynamics in Detroit During the COVID-19 Pandemic." Detroit Metro Area Communities Study, University of Michigan. <https://detroitssurvey.umich.edu/wp-content/uploads/2020/08/Unemployment-August-2020.pdf>.

¹¹ Rashawn Ray, Jane Fran Morgan, Lydia Wileden, Samantha Elizondo, and Destiny Wiley-Yancy; Examining and Addressing COVID-19 Racial Disparities in Detroit; The Brookings Institution, p. 14.

¹² Williams, Corey (14 September 2017). "Census Figures Show Drop in Detroit Poverty Rate". U.S. News.

- a. Because of the legacies of underinvestment, redlining, jobs without benefits, poor or nonexistent and culturally incompetent health care, Black residents are less likely to be able to transcend the challenges presented by COVID-19 and are more likely to contract and die from the virus.¹³
- b. In Detroit, Black people represent a comparable over 75 percent of known COVID-19 diagnoses by race, yet account for a disproportionate nearly 90 percent of deaths.

Id.

51. Therefore, according to the analysis handed down in *Thornburg v. Gingles*, 478 U.S. 30, 43–46, 106 S.Ct. 2752, 2762–2764, 92 L.Ed.2d 25 (1986), the redistricting Plans approved by Defendant violate the Voting Rights Act of 1965 (52 USCA § 10301) by implementing impermissible dilution of the Black vote in Michigan. As the Plans violate the Voting Rights Act, they also violate the Michigan Constitution at article 4, §6(13)(a) and (c).

COUNT II
Violation of Mich Const 1963, art 4, §6(13)(a) and (c):
Prohibited Retrogression of Minority Voting Power

52. Plaintiffs reallege the prior paragraphs as if restated fully hereunder.
53. "§ 5 of the [Voting Rights] Act is not necessarily subject to a dilution challenge under § 2. The sections differ in structure, purpose, and application; and in contrast to § 2 cases, a baseline for comparison under § 5 exists by definition: A proposed voting practice is measured against the existing practice to determine whether retrogression would result from the proposed change." *Holder v Hall*, 512 U.S. 874, 875, 114 S.Ct. 2581, 2583.

¹³ Rashawn Ray, Jane Fran Morgan, Lydia Wileden, Samantha Elizondo, and Destiny Wiley-Yancy; Examining and Addressing COVID-19 Racial Disparities in Detroit; The Brookings Institution, p. 1.

54. Under the new redistricting Congressional Plans the number of majority Black wards would be reduced from two to zero; under the State Senate Plans, from five to zero; and under the State House Plans, from 12 to 2.

55. Therefore, Defendant's proposed redistricting Plans constitute an unconstitutional, unlawful, and intolerable retrogression of the political achievement of Black persons in Detroit, and so violate Section 5 of the Voting Rights Act of 1965 (52 USCA § 10304(b, d)) and, necessarily, the Michigan Constitution at article 4, § 6(13)(a), (c).

COUNT III
Declaratory Action

56. Plaintiffs reallege the prior paragraphs as if restated fully hereunder.

57. The Court has the power to enter declaratory judgments. MCR 2.605(A)(1).

58. A case of actual controversy exists between these parties as Plaintiffs will imminently have their rights under the Michigan Constitution, the United States Constitution, and federal law (the Voting Rights Act of 1965) violated and be effectively completely disenfranchised.

59. Guidance is needed by the Court to assist the parties in their conduct going forwards, so that Plaintiffs and the entire Black population of Southeastern Detroit does not suffer the egregious and inexcusable injury of being racially discriminated against, disenfranchised, and having their legal, political, and civil rights eroded in one fell swoop.

60. The case in controversy is within the jurisdiction of this Court as, were the rights at issue violated, this Court would have original jurisdiction to hear causes of action arising out of those violations pursuant to Mich Const 1963, art 4, §6(19).

61. Specifically, Plaintiff requests a declaration from this Court that Defendant's proposed Michigan's Congressional, State Senate, and State House district voter districts Plans are

unconstitutional and unlawful as they do not comport with the requirements of the Voting Rights Act of 1965 and the Michigan Constitution of 1963, article 4, §6(13)(a)-(c).

CONCLUSION AND RELIEF REQUESTED

The new voting district maps drawn by the Commission will thwart the Black Civil Rights Movement that this nation is famous for; that this nation is proud of. Should this Court not stop the Defendant from implementing their Plans, the Black voters of Michigan will be cast backwards in time to the days before Civil Rights heroes like Martin Luther King, Jr. and Rosa Parks led the fight for the representation that Detroiters currently have. The community of interest that is the Detroit Black community, will go from one that can unite to become powerful enough to win the United States presidency for their chosen candidate to one that cannot even elect state congress persons and senators; no matter what their voter turnout.

Under the Voting Rights Act of 1965, and therefore, the Michigan Constitution, it does not matter what the intentions of Defendant's members were, only what the effects of their redistricting will be. The effects are clear: By breaking the majority-Black City of Detroit into eight voter districts from its previous two voter districts, it will dilute the vote of the Black community in Southeastern Michigan into meaninglessness. By reducing the ability of Black voters to be represented in this state and nationally. Defendant's Plan for the US Congressional districts, the number of majority Black wards would be reduced from two to zero; under the State Senate Plans, from five to zero; and under the State House Plans, from twelve to two. That is a total of 19 majority-minority wards reduced to just two.

The Commission was supposedly created to assure that the Voter Rights Act of 1965 was not violated. Unfortunately, that is exactly what is happening here. As the Voter Rights Act assures that majority-minority districts are not to be diluted in newly redrawn districts so that minority communities cannot elect their candidates of choice. This map falls far short of such mandates

under the Voter Rights Act and, if this Court does not act decisively to curb Defendant's ill-made Plans, then Black Detroiters, and the Black community everywhere, will suffer an egregious and despicable injury. As the late Martin Luther King, Jr. one said: "Injustice anywhere is a threat to justice everywhere." This Honorable Court should act swiftly to save the State of Michigan from the shame and embarrassment that will be associated with Defendant's redistricting Plans.

WHEREFORE, Plaintiff requests that this Honorable Court enter judgement in their favor against Defendant and issue an order containing the following relief:

- a) Declaring that Defendant's currently proposed redistricting plans violate the Michigan Constitution of 1963, art 4, §6(13)(a) and (c) and the Voting Rights Act of 1965 by impermissibly diluting the City of Detroit and majority Black votes of Detroiters;
- b) Declaring that Defendant's currently proposed redistricting plans violate the Michigan Constitution of 1963, art 4, §6(13)(a) and (c) and the Voting Rights Act of 1965 by impermissibly retrogressing the voting power of the Black community in the City of Detroit;
- c) Ordering that Defendant be required to redraw their redistricting plans in accordance with the Michigan Constitution of 1963, art 4, §6(13)(a) and (c) and the Voting Rights Act of 1965 and the order of this Court;
- d) Awarding reasonable attorneys fees; and
- e) Any and all such other relief that this Court deems just and equitable including any tolling of limitations periods necessary to accomplish justice.

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Dated: January 3, 2022

Respectfully submitted;

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VERIFICATION

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

Executed on: _____

Signed: _____
Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on this date I filed the foregoing paper and any attachments with the Clerk of Courts for the Michigan Supreme Court using the MiFile electronic filing system.

Respectfully submitted;

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/s/Nabih H. Ayad

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