

(810) 237-2078

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----- Forwarded message -----

From: **Erika Michel** <[emichel@cityofflint.com](mailto:emichel@cityofflint.com)>

Date: Mon, Jun 8, 2015 at 10:14 AM

Subject: Re: Coalition for Clean Water v COF

To: Peter Bade <[pbade@cityofflint.com](mailto:pbade@cityofflint.com)>

Cc: William Kim <[wkim@cityofflint.com](mailto:wkim@cityofflint.com)>, Anthony Chubb <[achubb@cityofflint.com](mailto:achubb@cityofflint.com)>

Attached is the Complaint and Motion for Injunctive Relief. I have created a new file under both your file lists and you will find these docs saved in the appropriate folder. I will draft the removal docs and send along to you for review.

E.

**Erika E. Michel**  
Senior Litigation Assistant  
Direct: (810) 237-2071

**City of Flint**  
Department of Law  
1101 S. Saginaw Street  
Flint, MI 48502  
Main: (810) 766-7146

On Mon, Jun 8, 2015 at 9:56 AM, Peter Bade <[pbade@cityofflint.com](mailto:pbade@cityofflint.com)> wrote:

I've assigned the defense of this matter to both of you.

Bill - you can take the COF.

Tony - you can take Natasha Henderson.

I've asked Erika to scan and email the complaint and motion to all of us asap. I've also asked her to prepare the removal to federal court. The state court judge is Hayman.

We can discuss later today.

Thanks

Peter M. Bade  
Chief Legal Officer  
City of Flint  
p: 810/766-7146  
f: 810/237-2114

**STATE OF MICHIGAN  
IN THE 7<sup>TH</sup> CIRCUIT COURT  
COUNTY OF GENESEE**

COALITION FOR CLEAN WATER, a  
Non-profit organization,

Plaintiffs,

V.

CITY OF FLINT, a municipal entity, and  
CITY OF FLINT ADMINISTRATOR NATASHA  
HENDERSON, In her official capacity

Defendants.

CASE NO.: 15-101900-CZ

HON. ARCHIE L. HAYMAN  
P-37516

TRACHELLE C. YOUNG (P63330)  
Attorney for Plaintiffs  
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There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this complaint pending in this court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge. I do not know of any other civil action, not between these parties, arising out of the same transaction or occurrence as alleged in this complaint that is either pending or was previously filed and dismissed, transferred, or otherwise disposed of after having been assigned to a judge in this court.

**COMPLAINT FOR INJUNCTIVE RELIEF, DECLARATORY RELIEF  
AND VIOLATION OF PLAINTIFFS FOURTEENTH  
AMENDMENT RIGHT TO DUE PROCESS**

NOW COMES Plaintiffs, COALITION FOR CLEAN WATER, by and through their attorney, Trachelle C. Young, & Assoc., P.L.L.C., by attorney Trachelle C. Young, and for their Complaint, states as follows:

**Parties, Jurisdiction and Venue**

1. Plaintiffs, Coalition for Clean Water (Coalition), is a Michigan nonprofit organization, based in Genesee county, Michigan and organized for the purpose of