## STATE OF MICHIGAN

## IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

JESSICA FLINTOFT, as Clerk of Scio Township,

Plaintiff,

Civil Action No. 22-000414-CZ

vs.

Hon. Timothy P. Connors

SCIO TOWNSHIP BOARD OF TRUSTEES,

Defendant.

Mark J. Magyar (P75090) DYKEMA GOSSETT PLLC Attorneys for Plaintiff 201 Townsend St., #900 Lansing, Michigan 48933 (616) 776-7523 mmagyar@dykema.com Michael Homier (P60318) Laura J. Genovich (P72278) Foster Swift Collins & Smith PC Attorneys for Defendant 1700 East Beltline, N.E., Suite 200 Grand Rapids, MI 49525-7044 Phone: 616.726.2238 mhomier@fosterswift.com lgenovich@fosterswift.com

## PLAINTIFF'S MOTION FOR SUMMARY DISPOSITION UNDER MCR 2.116(C)(10) AND MCR 2.116(I)(1)

Plaintiff Jessica Flintoft, as Clerk of Scio Township hereby moves for summary disposition under MCR 2.116(C)(10) and (I)(1) for an order entering judgment for Plaintiff on each of the three counts of her Verified First Amended Complaint. Under MCR 2.116(B)(2), the hearing on this motion shall not occur any sooner than June 16, 2022 (28 days after May 19, 2022, when Plaintiff filed her Verified First Amended Complaint). Plaintiff will complete and file her supporting brief promptly and not less than 21 days prior to the hearing per MCR 2.116(G)(1)(a)(i).

WHEREFORE, Plaintiff respectfully requests that the Court: (1) grant Plaintiff's motion; (2) enter judgment for Plaintiff as set forth in the Proposed Order to be submitted with the forthcoming supporting brief; and (3) grant such other relief as this Court deems just. Date: May 20, 2022

Respectfully submitted,

## DYKEMA GOSSETT PLLC

By: /s/ Mark J. Magyar Mark J. Magyar (P75090) Attorneys for Plaintiff 201 Townsend St., #900 Lansing, Michigan 48933 (616) 776-7523 mmagyar@dykema.com