

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

BLAINE COLEMAN,

Plaintiff,

Case No. 11-cv-15207

vs.

Hon. Mark A. Goldsmith

ANN ARBOR TRANSPORTATION  
AUTHORITY, MICHAEL FORD,  
TRANSIT ADVERTISING GROUP AA, and  
RANDY ORAM,

Defendants.

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**PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION**

To all Defendants:

Pursuant to Rules 26 and 34 and this Court's order dated May 29, 2012 (Dkt. # 35),  
please produce the following items:\*

**Request for Production # 1:**

All documents described by Rule 26(a)(1)(A).

**Response:**

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\* As used in this discovery request, "documents" means all items discoverable under Rules 26 and 34.

**Request for Production # 2:**

All documents you intend to use at the evidentiary hearing currently scheduled for July 23, 2012.

**Response:**

**Request for Production # 3:**

All documents in any way related to Plaintiff's ad, including but not limited to all documents regarding the rejection of Plaintiff's ad and the reason(s) therefor, and including but not limited to all documents related to Interrogatory ## 4, 5, and 6.

**Response:**

**Request for Production # 4:**

All documents in any way related to the following ads, including a copy of the following ads, and including but not limited to all documents regarding the acceptance or rejection of the following ads and the reason(s) therefor:

- a. All ads referred to in paragraphs 9, 10, 11, 12, 13, and 14 of Mary Stasiak's declaration.
- b. If the answer to Interrogatory # 11 is yes, all such ads.

**Response:**

**Request for Production # 5:**

A copy of all ads AATA has ever accepted or run, along with documentation regarding the date(s) of publication and purchaser/sponsor of the ad.

**Response:**

**Request for Production # 6:**

All documents related to the ACLU's Freedom of Information Act requests in June and July 2011, including but not limited to emails sent or forwarded to and from Michelle Sanders related to those requests.

**Response:**

**Request for Production # 7:**

If the answer to Interrogatory # 10 is yes, a copy of such policy or policies.

**Response:**

**Request for Production # 8:**

Other than the Advertising Policy produced as Exhibit A to Mary Stasiak's declaration, all policy statements or other rules or general guidance governing the decisionmaking process over whether to run an ad or whether an ad complies with the Advertising Policy.

**Response:**

Respectfully submitted,



Daniel S. Korobkin (P72842)

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Dated: June 5, 2012

**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2012, I served a copy of Plaintiff's First Set of Requests for Production on the following defense counsel by first-class mail and by email:

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