

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

PEOPLE OF THE STATE OF MICHIGAN,

vs

Case No. 19-272593-FC

NICHOLAS MAXIMILLIAN REMINGTON,

Defendant.

_____/

MOTION FOR RELIEF FROM ORDER

BEFORE THE HONORABLE VICTORIA A. VALENTINE

PONTIAC, MICHIGAN - WEDNESDAY, JUNE 9, 2021

APPEARANCES:

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WITNESS

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(None.)

EXHIBITS:

(None offered.)

1 Pontiac, Michigan

2 Wednesday, June 9, 2021

3 - - -

4 (At 9:53 a.m., proceedings convened.)

5 THE CLERK: Your Honor, now calling the case
6 2019-272593-FC, People v Remington.

7 MR. KEAST: Thank you, Judge. Marc Keast on
8 behalf of the People.

9 MR. ROCKIND: Neil Rockind, counsel on behalf of
10 Nicholas Remington.

11 MR. LEWIS: Good morning, Your Honor. Randall
12 Lewis, co-counsel on behalf of Mr. Remington.

13 MR. LAVIGNE: Good morning, Your Honor, for the
14 record, Joseph Lavigne. I'm appearing on behalf of non-
15 party Beth Hand. This is our motion for relief from order.

16 THE COURT: Okay, sir, go ahead with your
17 motion.

18 MR. LAVIGNE: Thank you.

19 Your Honor, I know the Court's had an
20 opportunity to review the motion and the brief, so I'm
21 just going to summarize. I did not receive a response from
22 any party, so I don't know anybody else's position, so I'd
23 like to reserve a little bit of time to respond.

24 But the nuts and bolts of it are that Ms. Hand
25 is not a party to this case. She's not an employee of a

1 party or a representative in any capacity. At this point
2 she's completely unconnected to the case and is a private
3 citizen. The People, who are the party to this case, are
4 well-represented, both by the prosecuting attorney and
5 assistant prosecuting attorney Keast. The Court has
6 jurisdiction to direct a party to do or refrain from doing
7 certain things, but with all due respect, the Court does
8 not have jurisdiction to compel a former employee to make
9 an affirmative affidavit of facts as the Court has
10 purported to do in its May 21st order.

11 The authorities are laid out in our brief. I've
12 also raised a couple of secondary concerns beyond
13 jurisdiction, one of those being that the Court is
14 essentially directing fact-finding on behalf of a party,
15 which I think is a dangerous proposition to take. The
16 Court has already fashioned a remedy, has already ruled,
17 yet is still asking for parties to come forward, or for a
18 non-party to come forward and provide a sworn affidavit of
19 facts.

20 The second issue is, that that affidavit is
21 something that can only be done based on personal
22 knowledge, and the proposed affidavit deponent has not had
23 access to this file now for almost six months. There has
24 been very little substantive that has occurred. The
25 Court's basically asking for a page-by-page or set-by-set

1 recitation of what was available and when and what was
2 turned over and when, all of which the People are in a
3 position to answer, but Ms. Hand is not.

4 The primary issue, Your Honor, though, is the
5 jurisdictional issue. I don't believe the Court can
6 compel Ms. Hand to file the affidavit that it has ordered.
7 For that reason, we're respectfully asking that the Court
8 amend its order and that she be granted relief from the
9 order and that the Court strike the requirement that
10 Ms. Hand file an affidavit.

11 You know, I also have raised in the brief the
12 issue that the Court has made some very specific findings
13 about how her actions may have affected the constitutional
14 rights of Mr. Rockind and Mr. Lewis' client. Obviously,
15 that puts her in a further very difficult position with
16 respect to making an affidavit. But I don't believe we
17 even get to that point because I don't think the Court has
18 authority to order her, a private citizen at this point
19 relative to the case, to do anything.

20 So with respect, Your Honor, we are asking that
21 you amend that portion of your order and strike the
22 requirement of an affidavit from Ms. Hand.

23 THE COURT: Mr. Rockind, would you like to
24 respond?

25 MR. ROCKIND: I would. I have no idea, I say

1 that after giving it a lot of thought and sort of debating
2 among the team of defense lawyers representing
3 Mr. Remington, I have no idea what Ms. Hand and
4 Mr. Lavigne are talking about. Let me say why I have no
5 idea what they're talking about.

6 You didn't order Ms. Hand to do anything. You
7 ordered the Oakland County Prosecutor's Office, on behalf
8 of the State of Michigan, who's prosecuting this case, to
9 attempt to -- and I thought you came up with a remedy --
10 attempt to solve or attempt to give the State an
11 opportunity to create, to attempt to put some salve on the
12 gaping wound that has been discovered and identified and
13 that's been ultimately pointed out by the Court in the
14 disclosure shortcomings by Ms. Hand, contained in your
15 order, identified in your order, prior to Your Honor
16 issuing that order and prior to Ms. Hand leaving the
17 prosecutor's office.

18 That's correct hasn't ordered Ms. Hand to do
19 anything. Unless I'm mistaken, I don't believe the Court
20 sent Ms. Hand a subpoena. As far as I know, the Court
21 didn't send Ms. Hand a demand for an affidavit. As far as
22 I know, the Court didn't order Ms. Hand to appear
23 personally and have to answer any questions.

24 What I do believe is that the Court fashioned a
25 portion of a remedy and then addressed another portion to

1 the State, which was, that if you want to move forward
2 with this case, then you need to be able to satisfy the
3 Court, you, Judge Valentine, that there is -- that there
4 are no outstanding Brady issues, outstanding
5 non-disclosures, outstanding failure to disclose, and all
6 the issues that the Court is already aware of that came in
7 the -- during the prosecution of Mr. Remington in the
8 district court and following before Judge Alexander.

9 Unless I missed something, the issue that it
10 seems like Mr. Lavigne and Ms. Hand are attempting to
11 address, is one that really is between the State and
12 Ms. Hand. Your Honor [sic] was directed to the party,
13 which is the State of Michigan, and you provided an order
14 and a direction for the State of Michigan, to attempt to
15 continue to salvage this prosecution. And those are my
16 words, not yours. I know that I'm advocating here, but
17 that's how I interpreted your order.

18 Your order was, there's been some procedural and
19 substantive unfairness, and if the State, one way for the
20 Court to be satisfied that this unfairness is capable of
21 being remedied, you fashioned one issue, which was the one
22 portion of the order, which was the exclusion of the
23 Snapchats in this case.

24 And the other was that Mr. Keast would prepare
25 an affidavit on behalf of the State, and that the State

1 should gather an affidavit from Ms. Hand, because she was
2 the prosecutor who had intimate and personal knowledge of
3 things that occurred on her watch while she was the
4 prosecutor on this file.

5 So I'm not sure what the relief from order is.
6 The prosecutor hasn't sought leave for relief from the
7 order. The prosecutor, as far as I know, Ms. McDonald's
8 office and Mr. Keast, have attempted to comply with the
9 Court's order by having -- I believe Mr. Keast reviewed
10 the matter and prepared a very detailed affidavit.

11 Am I right, Mr. Keast, you did that?

12 MR. KEAST: Correct, I did.

13 MR. ROCKIND: He's submitted that and he made us
14 aware of it. And I believe he submitted it to the Court.
15 So I'm not sure what relief from order Ms. Hand is
16 seeking.

17 She, of course, can choose to tell the State,
18 which apparently, she has, that she has no interest or is
19 unwilling or incapable of providing that affidavit. If
20 she's unwilling, incapable, or unable to sign an affidavit
21 and cooperate with the State prosecutor's office, then
22 that is something that the Court will have to deal with,
23 with the State prosecutor's office. But this isn't an
24 issue that even involves -- this isn't a petition -- this
25 is really Ms. Hand's attempt to spare the prosecutor's

1 office from having to deal with Your Honor and Your
2 Honor's directions. I mean, I don't know how else to
3 explain that.

4 I mean, to me, the other thing that I thought is
5 interesting, this is between the prosecutor's office and
6 Ms. Hand. It's not between the Court and Ms. Hand. The
7 Court --

8 THE COURT: Mr. Keast, go ahead, sir.

9 MR. ROCKIND: I'm sorry, Your Honor, I wanted to
10 say one other thing.

11 THE COURT: Go ahead.

12 MR. ROCKIND: I know that Mr. Lavigne referred
13 to Ms. Hand as a private citizen now. And I think that
14 that is a title -- that is a title and a designation that
15 is too conveniently capable of being adopted by somebody
16 who was essentially the captain of a capital case, capital
17 prosecution I'm referring to as a case, for well over a
18 year.

19 And we've already discovered in this case that
20 Ms. Hand is aware of and had -- as I think Mr. Lavigne
21 pointed out, an affidavit would have to be based on
22 personal knowledge. And I think one of the Court's
23 concerns -- I don't want to speak for Your Honor and of
24 course you'll tell me if I'm overstepping my bounds, I
25 don't want to speak out of turn -- but that there were

1 things that were within Ms. Hand's personal knowledge,
2 exclusively within her personal knowledge regarding the
3 investigation and prosecution of Mr. Remington.

4 Mr. Keast is simply not in a position to be able
5 to answer some of those questions. He doesn't have that
6 personal knowledge. Mr. Balog doesn't have that personal
7 knowledge. Apparently, Mr. Terry Healey [ph] himself, who
8 is purportedly this person who was involved in this, I'll
9 call it an as-yet phantom interview with a res gestae
10 witness, because there's not a single bit of documentation
11 of Mr. Healey and Ms. Hand sitting down with this
12 eyewitness.

13 We know that it took place. It's been conceded
14 by Ms. Hand on the record before Judge Alexander that it
15 took place. Judge Alexander specifically asked her whether
16 she intended to provide it, and she at one point -- Judge
17 Alexander said, well, I think it was -- she acknowledged
18 that there was a second interview, and she said we haven't
19 -- the judge said on page 17, "You didn't give him any of
20 the information from the second interview?" This is from
21 December 4, 2020. Ms. Hand's response, "The second
22 interview after the preliminary examination? No, Your
23 Honor, not yet."

24 "Not yet" means it's coming. Now, I will say,
25 as an officer of the court, that I wasn't present at that

1 interview. I think I can speak for Mr. Lewis, who's
2 sitting pensively with his hands over his mouth watching,
3 that he wasn't present for that interview. I know for a
4 fact that Mr. Lavigne wasn't present, because he wasn't
5 involved in the case, and probably had no idea that any of
6 this was going on before he agreed to represent Ms. Hand
7 in this hearing.

8 Mr. Keast, I think I can say with a hundred
9 percent confidence, was not present during that interview.
10 There were only three people who were arguably present
11 during that interview; one was Ms. Hand. The one was Terry
12 Healey, who has apparently no memory of it, and no notes
13 of it, and no information about it. And Ms. Hand conceded
14 that, during that hearing on December 4th before the
15 judge, that the witness had changed his story.

16 And ultimately, in the end, on page 18, he said
17 something that is the most exculpatory thing that could
18 happen in a case in which there's an allegation of
19 delivery, which is -- and then he started to say, well, he
20 didn't see him give it to him. In a case in which there's
21 an allegation of someone giving something to another
22 person, and that person then dying, that is -- can't get
23 any more exculpatory than that.

24 So I don't even understand what we're even
25 talking about here. I don't even think Ms. Hand has to

1 review the file, she could simply decide that she's
2 capable of putting pen to paper in a sworn statement and
3 saying what -- what she -- what her exchanges with
4 Detective Balog were, what information she received from
5 Mr. Balog, when she received it, what she was told. If
6 she's comfortable putting that in an affidavit, and she
7 wants to make that affidavit, then she can.

8 The Court didn't order her to do that. The Court
9 attempted to order the prosecutor's office --

10 THE COURT: Mr. Rockind, I specifically indicate
11 that she is to provide an affidavit.

12 MR. ROCKIND: Right, but that is an order
13 directed to the State.

14 THE COURT: Go ahead Mr. Keast.

15 MR. KEAST: Thank you, Judge.

16 I was just going to reiterate what the order
17 said, in that the Court -- I'm reading the order right
18 now, the Court does order Ms. Hand to file an affidavit.
19 In my own pleadings I indicated that this file is the
20 property of the Oakland County Prosecutor's Office. As
21 the assistant prosecuting attorney on the matter, I have
22 that file. I have everything that this office has ever
23 had.

24 As I indicated in a prior pleading on May the
25 5th of this year, I met with the officer in charge and I

1 reviewed his police file. Everything that the police file
2 showed was turned over to me, and in fact turned over to
3 defense counsel, and I outline that, Judge. I do believe
4 that Mr. Lavigne's motion is correct. I believe that it is
5 legally correct and factually correct, for nothing more
6 than the fact that I'm not going to give Ms. Hand this
7 file to review. I can't do that, Judge, she's no longer a
8 prosecutor at the Oakland County Prosecutor's Office.

9 I think that -- I don't know what she would be
10 able to write as far as what evidence there would be to
11 admit. And, you know, Mr. Rockind can interpret it one
12 way, and he's certainly entitled to do that, but as I look
13 at this order, it does appear to me that this Court did in
14 fact order Ms. Hand to detail a list of all evidence in
15 the case. And as I stated, Judge, I don't think that she's
16 in a position to do that, and I believe Mr. Lavigne amply
17 laid that out in his motion.

18 MR. ROCKIND: But isn't the Court directing that
19 -- I mean, aren't we just sort of quarreling or quibbling
20 over, I guess a dot on a page, which is on page 8. I know
21 the Court's order is directed to the State.

22 MR. KEAST: But, you know, it's dangerous to
23 play fast-and-loose with interpretation of the Court's
24 order. Only the Judge can interpret the order --

25 MR. ROCKIND: I understand. What I'm saying is,

1 this order wasn't -- this order wasn't served on Ms. Hand.
2 She wasn't ordered to appear. This was an order that was
3 directed to the State. The State is the party. And if the
4 State can't provide, can't gather an affidavit from the
5 former assistant prosecutor about the case, then the State
6 can't satisfy the Court and its concerns about Brady
7 evidence.

8 MR. LAVIGNE: May I respond, Your Honor?

9 THE COURT: Go ahead, Mr. Lavigne.

10 MR. ROCKIND: I mean, I don't want to even get
11 into all of the implications why -- I mean, I think --

12 THE COURT: Go ahead, Mr. Lavigne.

13 MR. LAVIGNE: Thank you.

14 MR. ROCKIND: -- Ms. Hand is currently a
15 practicing lawyer. I think she's still a lawyer --

16 THE COURT: Mr. Rockind, let Mr. Lavigne speak.

17 MR. ROCKIND: Sure, Your Honor.

18 MR. LAVIGNE: Thank you, Your Honor.

19 I will agree with Mr. Rockind about his
20 indications of the lack of notice and service on Ms. Hand.
21 I think the Court's already indicated, and Mr. Keast has,
22 the reason that we're here, I'm not trying to waste
23 anybody's time, but I read the order to say the Court
24 orders that an affidavit from both the former assistant
25 prosecutor Hand and the current assistant prosecutor Keast

1 shall be provided.

2 So my reading of the order is the reason that we
3 filed this motion, which is I don't believe it is limited
4 to its application to the current Oakland County
5 Prosecutor's Office only. So I will tell the Court, we're
6 not trying to intervene or spare the prosecutor's office
7 any kind of an obligation, as is suggested. The Court can,
8 and it sounds like has, satisfied any outstanding Brady
9 issues through the party to the case, the People.
10 Mr. Rockind talked about the affidavit or the supplemental
11 document filed by Mr. Keast. I haven't seen that --

12 THE COURT: Mr. Lavigne, I don't think that's
13 correct. The problem is that the violations that are
14 alleged, and the violations that have been agreed to by
15 the prosecutor's office, involve Ms. Hand. How can I
16 secure the satisfaction that the evidence has been
17 produced when there has not been information put in the
18 file?

19 According to the arguments of Mr. Rockind, and
20 the information that Mr. Keast has now gathered, there are
21 interviews with no notes, there's information that was --
22 that was given, allegedly, to Ms. Hand, that hasn't been
23 provided for. How can I put that on the prosecutor's
24 office, that doesn't have the information? And how could
25 the Court not have jurisdiction over Ms. Hand, in a

1 capital murder case, felony case, on behalf of the Oakland
2 County Prosecutor's Office, who didn't put things in the
3 file, allegedly?

4 MR. LAVIGNE: Well, I think that the Court can
5 fashion the remedy that it has and it can order the
6 prosecutor's office to do --

7 THE COURT: What do I know -- what is there that
8 no one knows of? I think that with regard to the
9 information that's in the file, that's sufficient. That's
10 not as far as the Brady violations that are alleged go.
11 It's information that hasn't been put anywhere. We have
12 reports that were drafted 18 months after information was
13 given to the prosecutor's office. How do I know, how can I
14 secure that information, for the due process of the
15 defendant and for the benefit of the community, without
16 Ms. Hand?

17 MR. ROCKIND: And, Judge, can I add, for
18 Mr. Lavigne's benefit, that the report that was generated
19 18 months after the interview was prepared at the
20 direction of Mr. Keast, who saw that there was another
21 hole in the disclosure issues with Ms. Hand and Mr. Balog.
22 He saw that and directed that Mr. Balog, to the best of
23 his ability, prepare a report 18 months later to document
24 an interview that Mr. Balog and Ms. Hand had with a
25 witness, in which, again, exculpatory evidence was -- that

1 evidence was exculpatory. I mean, there are no
2 contemporaneous notes.

3 I don't know if Mr. Lavigne knows the file, but
4 Ms. Hand objected to her own statements to the witness
5 during the preliminary examination, which we would argue
6 were statements that were potentially admissions by a
7 party opponent or weren't even offered for the truth of
8 the matter asserted, but Ms. Hand objected. Then there's
9 no report prepared. And that's not the only issue. I mean,
10 we've detailed --

11 THE COURT: So Mr. Lavigne, as your argument
12 goes, Ms. Hand is a private citizen now; so is she
13 entitled to be called as a witness at the preliminary
14 exam?

15 MR. LAVIGNE: I certainly think she -- in terms
16 of entitled, I certainly think she has the capability to
17 be subpoenaed. Whether she can be compelled to actually
18 testify, I think is a different story.

19 THE COURT: Well, why wouldn't she be compelled
20 to testify? Tell me, why wouldn't she be able to be
21 compelled to testify?

22 MR. LAVIGNE: Well, there could be a number of
23 different reasons. You could be talking about work product
24 issues. You could be talking, quite candidly, about Fifth
25 Amendment issues, in light of the findings that the Court

1 has made. I think everybody on this motion hearing that
2 has a P-number would understand the implications of what
3 the Court or somebody examining her on the stand could
4 potentially be trying to seek. And I'm not conceding that
5 she's done anything that would have to, but the question
6 is, could the question have any tendency. I think you have
7 those issues as well.

8 I mean, it's an interesting academic question.
9 I'd be happy to, you know, go into it further with Your
10 Honor, but I think that if the Court decides to allow the
11 parties to go that route, they have that right, and we
12 could address that at that point in time before the
13 district court, if that's what happens. But I don't know
14 that the Court, again with all due respect, can compel an
15 affidavit from a non-party as to facts that the Court is
16 ordering in its May 21st order.

17 MR. ROCKIND: I mean, it sounds like --

18 THE COURT: But then at the same time, you
19 believe that she could be summoned or subpoenaed to go and
20 testify, but that she could waive -- or she could raise
21 some issues, such as her Fifth Amendment, which, sir, I'm
22 not sure that -- that the factual questions that are
23 asked, that she'd be able to have a Fifth Amendment right.
24 And when you say work product, this isn't work product,
25 sir. These are Brady violations. This isn't work product.

1 MR. LAVIGNE: With respect, Your Honor, I'm
2 doing the best I can to try to address the Court's
3 hypothetical.

4 THE COURT: I understand, Mr. Lavigne.

5 MR. LAVIGNE: And as I indicated before, I'm not
6 conceding any issues on her behalf. But in terms of the
7 Court's query about, could she be subpoenaed, I think she
8 could at least be subpoenaed. And then where it goes from
9 there, I think is an open issue, let's say, at this point.

10 THE COURT: Anything else?

11 MR. LAVIGNE: Just ask the Court to grant the
12 motion. If the defense decides they want to subpoena
13 Ms. Hand to testify for exam, we'll address it at that
14 point. But at this point there's no basis for the Court to
15 order the production of the affidavit.

16 MR. ROCKIND: I have to back up. Why is it that
17 the defense has to carry the water here? I mean, the Court
18 has already made its finding regarding Brady violations.
19 The State has conceded that there were Brady violations
20 committed by Ms. Hand. There are other --

21 MR. LAVIGNE: Why does there have to be an
22 affidavit?

23 MR. ROCKIND: Because the Court, I think, was
24 trying to come up --

25 THE COURT: There's still a case pending. There

1 is still a case pending. There are still issues that are
2 outstanding. If this is a case that's going to be pursued,
3 it needs to be -- everything needs to be presented
4 appropriately as if there is no Brady violations. Now how
5 do we do that if there's things not in the file?

6 MR. ROCKIND: So the answer to Mr. Lavigne's
7 question, he wanted to know why there was an affidavit, or
8 why the Court -- obviously I can't get into the Court's
9 thinking, but we've had enough conversations with the
10 Court and enough arguments before the Court that I believe
11 the Court was trying to fashion a remedy to address what
12 evidence Ms. Hand was aware of and what was out there that
13 was not contained in the file, and that an affidavit from
14 a lawyer, with all of the potential repercussions that an
15 affidavit has with it, being a statement, a statement
16 under oath, that that would potentially address that
17 issue.

18 I think we lost the Judge there for a second.

19 THE COURT: Nope, I'm right here.

20 The Court is going to take this under
21 advisement.

22 MR. ROCKIND: I was going to say, Judge, that I
23 don't think that Mr. Lavigne is right, that the defense
24 should have to call Ms. Hand. If Ms. Hand is going to have
25 to -- if she can be compelled, she can be compelled by the

1 Court. If she wants to assert a privilege, she can assert
2 a privilege. And you know, if she wants to plead the
3 Fifth, she can plead the Fifth, never going to deny
4 anybody the right to plead the Fifth if that's what they
5 believe is in their best interest.

6 THE COURT: Okay. Thank you. I will issue an
7 opinion.

8 MR. ROCKIND: Thank you very much, Your Honor.

9 MR. KEAST: Thank you, Judge.

10 MR. LEWIS: Thank you, Your Honor.

11 MR. LAVIGNE: Thank you, Your Honor.

12 Your Honor, if I could make one request of the
13 Court. The efile system that changed over on Monday only
14 allows parties to the case to receive electronic service.
15 I filed a document yesterday, a SCAO form specifically
16 requesting to be added to the case so that I could receive
17 eservice. That was rejected by the court clerk --

18 THE COURT: I'll have you added, by anything
19 that's filed, Mr. Keast and Mr. Rockind, you are required
20 to serve Mr. Lavigne.

21 MR. KEAST: Judge, would you like me to serve
22 Mr. Lavigne the affidavit that I filed?

23 THE COURT: Yes, please. Thank you.

24 MR. LAVIGNE: I just wanted everybody to know I
25 wasn't connected with the case any longer, so I appreciate

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that, Your Honor.

THE COURT: Thank you.

(At 10:17 a.m., proceedings concluded.)

- - -

CERTIFICATION

I certify that this transcript, consisting of 23 pages, is a true and accurate transcription, to the best of my ability, of the video proceeding in this case before the Honorable Victoria A. Valentine on Wednesday, June 9, 2021, as recorded by the clerk.

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/s/ Cheryl McKinney, CSMR-5594
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