

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OTTAWA

ADELINE HAMBLEY,

Plaintiff,

v.

OTTAWA COUNTY,
a Michigan County;
OTTAWA COUNTY BOARD OF COMMISSIONERS; and
JOE MOSS, SYLVIA RHODEA,
LUCY EBEL, GRETCHEN COSBY,
REBEKAH CURRAN, ROGER BELKNAP,
and **ALLISON MIEDEMA,**
Ottawa County Commissioners in their
individual and official capacities,

Defendants.

Case No: 23-7180-CZ

Hon. Jenny McNeill
Sitting by SCAO Assignment

**PLAINTIFF'S MOTION FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF
PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT AGREEMENT**

Plaintiff, through counsel, seeks leave of Court under MCR 2.119(A)(2)(b) to file the attached Reply in support of her motion to enforce the November 6, 2023 Settlement Agreement. A Reply here is necessary, appropriate, and potentially helpful to the Court, first to attach an additional exhibit of written communication between the parties that the defense did not include. A Reply is also warranted here because Defendants' arguments and attached affidavit necessarily raised new legal issues – waiver of attorney-client privilege and the ability of this Court to review the November 6, 2023 closed session meeting minutes. The Reply will be useful to

having these matters more fully briefed for the Court prior to the November 27, 2023 hearing.

Accordingly, Plaintiff respectfully requests that this Court permit the filing of the attached Reply brief and Exhibit 4.

PINSKY SMITH, PC
Attorneys for Plaintiff Adeline Hambley

Dated: November 24, 2023

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