

PUBLIC CITIZEN LITIGATION GROUP

1600 20TH STREET, N.W.
WASHINGTON, D.C. 20009-1001

(202) 588-1000

September 29, 2011

Honorable Clinton Canady III
Ingham County Circuit Court
313 West Kalamazoo Street
Lansing, Michigan 48933

Re: *Thomas M. Cooley Law School v. John Does*
No. 11-781-CZ

Dear Judge Canady:

In the course of oral argument on Monday afternoon, I may refer to some of the following authorities in addressing the argument in Part B of plaintiff's Supplemental Brief, filed last Friday, that Michigan Court Rule 2.302(B)(7) is limited to attorney-client privilege and protection of trial-preparation material:

Lee v. AFT-Yakima, 2011 WL 2181808 , at *11 (E.D. Wash., June 3, 2011)

Kraft Foods Global v. Dairilean, Inc., 2011 WL 1557881, at *5 (N.D. Ill. Apr. 25, 2011)

In re Fannie Mae Securities Litigation, 552 F.3d 814, 824 (D.C. Cir. 2009)

Coleman v. Schwarzenegger, 2008 WL 2237046, at *3 (E.D. Cal. May 29, 2008),

Coleman v. Schwarzenegger, 2008 WL 1749474, at *3 (E.D. Cal. April 14, 2008)

Ponca Tribe of Indians of Oklahoma v. Continental Carbon Co., 2008 WL 1732947, at *4 (W.D.Okla. Apr. 10, 2008)

I am sending this letter to counsel for the parties by email as well as first-class mail, to ensure that they will have the opportunity to review the cases before the hearing.

Respectfully yours,


Paul Alan Levy

cc: Michael Coakley, Esquire
John Hermann, Esquire