

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

KRISTY DUMONT; DANA
DUMONT; ERIN BUSK-SUTTON;
REBECCA BUSK-SUTTON; and
JENNIFER LUDOLPH,

Plaintiffs,

v.

NICK LYON, in his official capacity
as the Director of the Michigan
Department of Health and Human
Services; and HERMAN MCCALL,
in his official capacity as the
Executive Director of the Michigan
Children's Services Agency,

Defendants.

No. 17-cv-13080-PDB-EAS

HON. PAUL D. BORMAN

MAG. ELIZABETH A.
STAFFORD

**DEFENDANTS NICK LYON'S
AND HERMAN MCCALL'S
WITNESS LIST**

Ann-Elizabeth Ostrager
Ryan D. Galisewski
Jason W. Schnier
Attorneys for Plaintiffs
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004
(212) 558-7357
Ostragerae@sullcrom.com
Galisewskir@sullcrom.com
Schnierj@sullcrom.com

Leslie Cooper
Attorney for Plaintiffs
ACLU Foundation
125 Broad St., 18th Floor
New York, NY 10004
(212) 549-2584
lcooper@aclu.org

Daniel Mach
Attorney for Plaintiffs
American Civil Liberties Union
915 15th St., NW
Washington, DC 20005
(202) 675-2330
dmach@aclu.org

Jay D. Kaplan (P38197)
Michael Steinberg (P43085)
Kary L. Moss (P49759)
Attorneys for Plaintiffs
American Civil Liberties
Fund of Michigan
2966 Woodward Avenue
Detroit, MI 48201
(313) 578-6814
kaplan@aclumich.org
msteinberg@aclumich.org

Joshua S. Smith (P63349)
Jonathan S. Ludwig (P64919)
Attorneys for Defendants
Michigan Department of Attorney General
Health, Education & Family
Services Division
P.O. Box 30758
Lansing, MI 48909
(517) 373-7700
smithj46@michigan.gov
ludwigj1@michigan.gov

John J. Bursch (P57679)
SAAG
Attorney for Defendants
Bursch Law PLLC
9339 Cherry Valley Ave SE
#78
Caledonia, MI 49316
(616) 450-4235
jbursch@burschlaw.com

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**DEFENDANTS NICK LYON’S AND HERMAN MCCALL’S
WITNESS LIST**

Pursuant to this Court’s Amended Scheduling Order, Doc. 50,
Defendants Nick Lyon and Dr. Herman McCall, Ed.D. (State
Defendants), provide the following witness list, which is subject to
amendment as further witnesses and facts are adduced during the
course of discovery:

1. Current Michigan Department of Health and Human Services staff and/or employees;
2. Former Michigan Department of Health and Human Services staff and/or employees;
3. Staff and/or employees currently employed with other branches, departments or divisions of the State of Michigan;
4. Staff and/or employees formerly employed with other branches, departments or divisions of the State of Michigan;
5. Expert or experts on the difficulty of state foster care and adoption systems to place children following loss of faith-based providers;
6. Expert or experts on ability of faith-based providers to place children who are difficult to place or adopt due to special needs or other circumstances;
7. All named Plaintiffs;
8. All named Intervening Defendants;
9. One or more officers and/or staff of Intervening Defendant St. Vincent Catholic Charities;

10. One or more officers and/or staff of Bethany Christian Services;
11. Any persons allegedly similarly situated to the Plaintiffs;
12. Any persons allegedly similarly situated to the Intervening Defendants;
13. Any and all witnesses, including experts, listed and/or called by Plaintiffs;
14. Any and all witnesses, including experts, listed and/or called by Intervening Defendants;
15. Any and all witnesses necessary for authentication or foundation of exhibits;
16. Any and all witnesses necessary for rebuttal; and
17. Any and all witnesses that may become necessary during the trial.

Because discovery is ongoing, State Defendants are unable to determine who among the above witnesses they are likely to call to testify at trial. Accordingly, State Defendants reserve the right to amend their witness list as necessary.

Respectfully submitted,

Bill Schuette
Attorney General

/s/ Joshua S. Smith
Jonathan S. Ludwig
Assistant Attorneys General
Attorneys for Defendants
Health, Education & Family
Services Division
P.O. Box 30758
Lansing, MI 48909
(517) 373-7700
smithj46@michigan.gov
ludwigj1@michigan.gov
P63349
P64919

Dated: October 15, 2018

CERTIFICATE OF SERVICE (E-FILE)

I hereby certify that on October 15, 2018, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

/s/ Joshua S. Smith
Assistant Attorney General
Attorney for State Defendants
Health, Education &
Family Services Division
P.O. Box 30758
Lansing, MI 48909
(517) 373-7700
Smithj46@michigan.gov
P63349