STATE OF MICHIGAN

IN THE COURT OF CLAIMS

DAVID KRIEGER, et al. Plaintiffs MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY, et al., Defendants.	Court of Claims Nos. 20-000094-MM; 20-000102-MM; 20-000103-MM; 20-000111-MM; 20-000112-MZ; 20-000116-MM; 20-000118-MM; 20-000121-MM; 20-000140-MM; 20-000151-MM; 20-000156-MM; 20-000230-MM; 20-000232-MZ; 20-000233-MM; 20-000235-MM; 20-000237-MM; 20-000239-MM; 20-000240-MZ; 20-000241-MM; 20-000246-MM; 20-000257-MM; 20-000260-MM; 20-000262-MM; 23-000074-MZ; 23-000076-MM HON. JAMES ROBERT REDFORD

STIPULATED PROTECTIVE ORDER REGARDING DE BENE ESSE DEPOSITION OF RICHARD DEE PURKEYPILE

At a session of said Court, held in

The Court of Claims

State of Michigan on 12-4, 2025

PRESENT: James Robert Redford
COURT OF CLAIMS JUDGE

It is hereby stipulated by and between counsel of record and counsel for non-party, Richard Dee Purkeypile, as follows:

It is stipulated that as it pertains to the Subpoena and Notice of Taking Deposition of Richard Dee Purkeypile De Bene Esse, issued by Defendants Environment, Natural Resources, and Agriculture Division, the scope of the de bene esse deposition shall be limited to matters of

RECEIVED by MCOC 12/4/2025 3:36:17 PM

fact only, and in the event any party attempt to elicit expert opinions and/or expert testimony, the witness Richard Dee Purkeypile will be instructed by his counsel not to answer;

Stipulated as to form and substance:

/s/ Danielle Allison-Yokom (w/permission)
Nathan A. Gambill (P75506)
Danielle Allison-Yokom (P70950)
Richard Kuhl (P42042)
Nathan Frischkorn (P85359)
Assistant Attorneys General
Attorneys for Defendants Environment,
Natual Resources, and
Agriculture Division

/s/ Rana D. Lange
Rana D. Lange (P67627)
Quintairos, Prieto, Wood, Boyer P.A.
Attorneys for Richard Dee Purkepile

NOW, WHEREFORE, it is hereby ordered as follows:

IT IS HEREBY ORDERED that as it pertains to the Subpoena and Notice of Taking Deposition of Richard Dee Purkeypile De Bene Esse, issued by Defendants Environment, Natural Resources, and Agriculture Division, the scope of the de bene esse deposition shall be limited to matters of fact only, and in the event any party attempt to elicit expert opinions and/or expert testimony, the witness Richard Dee Purkeypile will be instructed by his counsel not to answer.

IT IS SO ORDERED.

Hon. James Robert Redford

Court of Claims
State of Michigan

RECEIVED by MCOC 12/4/2025 3:36:17 PM