STATE OF MICHIGAN
IN THE COURT OF CLAIMS

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY,

Plaintiff/Counter-Defendant,

v

DR. FARIDEH BAGNE, and CORY SOUTHWELL; and NORTHERN VISTA LAWN AND LANDSCAPE INC.,

Defendants/Counter-Plaintiffs.

v

BILL OEMING, IN HIS OFFICIAL CAPACITY AS AN EMPLOYEE OF THE MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY.

Counter-Defendant.
_____/

Court of Claims No. 25-000196-MB

HON. SIMA G. PATEL

Cheboygan County Circuit Court Case No. 25-9159-CE

HON. AARON J. GAUTHIER

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STIPULATION AND PROPOSED ORDER TOLLING DISCOVERY

PRESENT: HONORABLE SIMA G. PATEL
Court of Claims Judge

Plaintiffs/Counter-Defendants the Michigan Department of Environment, Great Lakes, and Energy ("EGLE") and Mr. Bill Oeming (collectively "Counter-Defendants"), and Defendants/Counter-Plaintiffs Dr. Farideh Bagne, Cory Southwell, and Northern Vista Lawn and Landscape, Inc. (collectively "Counter-Plaintiffs") stipulate as follows:

1. Counter-Defendant EGLE filed a complaint against Counter-Plaintiffs in the Cheboygan County Circuit Court on September 23, 2025. (9/23/25 Compl.)
2. Counter-Plaintiffs answered the complaint and filed counterclaims against EGLE and Mr. Oeming in the Cheboygan County Circuit Court on November 17, 2025. (11/17/25 Answer and Counterclaim.)
3. Counter-Plaintiffs transferred the counterclaims to this Court on December 19, 2025, leaving EGLE's claims against Counter-Plaintiffs still pending in the Cheboygan County Circuit Court. (12/19/25 Notice of Transfer.)
4. The Cheboygan County Circuit Court entered a discovery scheduling order related to EGLE's claims against Counter-Plaintiffs on January 7, 2026.
5. To date, no discovery order has been entered related to the counterclaims in this Court, which are subject to Counter-Defendants' pending motion for summary disposition.
6. The Cheboygan County Circuit Court dismissed EGLE's claims against Counter-Plaintiffs with prejudice on March 20, 2026.
7. The Parties wish, with the Court's leave, to conduct settlement discussions related to the counterclaims before this Court without simultaneously conducting discovery related to those counterclaims.

8. The Parties agree that, with the Court's leave, once settlement talks have concluded the Parties will promptly inform the Court of any developments in the matter and propose a new discovery schedule for the Court's consideration, if necessary.

Stipulated as to form and content:

Dated: April 28, 2026

/s/Joshua J. Cianek (w/permission)
Joshua J. Cianek (P87957)
Attorney for Plaintiff

Dated: April 28, 2026

/s/Daniel P. Bock
Daniel P. Bock (P71246)
Attorney for Defendants

From:	Cianek, Joshua (AG)
To:	Dan Bock
Cc:	Jamy Staffeld; Hudecek, Sharon (AG)
Subject:	RE: EGLE v Bagne discovery stipulation for the Court of Claims
Date:	Thursday, April 23, 2026 1:06:33 PM
Attachments:	image004.png image005.png image006.png image007.png

Good afternoon, Dan,

I've discussed this with EGLE, and they've agreed to stipulate to this.

The draft you shared looks good to me. For efficiency, you have my permission to sign on my behalf.

Best,
Joshua D. Cianek
Assistant Attorney General
Michigan Department of Attorney General
Environment, Natural Resources, and Agriculture Division
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From: Dan Bock <dbock@fsbrlaw.com>
Sent: Monday, April 20, 2026 3:19 PM
To: Cianek, Joshua (AG) <CianekJ2@michigan.gov>
Cc: Jamy Staffeld <jstaffeld@fsbrlaw.com>
Subject: EGLE v Bagne discovery stipulation for the Court of Claims

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Josh,

ORDER

PRESENT: HONORABLE SIMA G. PATEL
Court of Claims Judge

The Court, having reviewed the above stipulation, and being otherwise fully advised in the premises, and in accordance with the above stipulation, Orders as follows:

IT IS HEREBY ORDERED that the discovery deadlines previously established by the Cheboygan County Circuit Court shall be tolled as they relate to the claims before this Court to allow the Parties to engage in settlement discussions. If settlement discussions do not result in a

disposition of the claims presently before this Court, the Parties shall propose new discovery deadlines for the Court's review and approval.

IT IS SO ORDERED.

This is not a final order and does not close the case.

Dated: April 29, 2026

Honorable Sima G. Patel
Court of Claims Judge