STATE OF MICHIGAN
COURT OF CLAIMS

MICHIGAN GRASSROOTS ALLIANCE,

Plaintiff,

v

MICHIGAN DEPARTMENT OF STATE,

Defendant.

No. 26-000047-MZ

HON. MICHAEL F. GADOLA

Philip L. Ellison (P74117)
Thomas L. Lambert (P86348)
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STIPULATION TO EXTEND DEADLINE FOR DEFENDANT'S RESPONSE TO PLAINTIFF'S 8/25/26 MOTION FOR PARTIAL SUMMARY DISPOSITION

The parties stipulate and agree to the entry of an order extending Defendant's deadline to respond to Plaintiff's 08/25/2026 motion for partial summary disposition by 28 days until October 6, 2026 and further state as follows:

1. On May 4, 2026, Defendant filed a motion for summary disposition which is fully briefed and pending a decision from this Court.

2. On June 18, 2026, Plaintiff served initial disclosures along with its First Set of Discovery which included 15 requests for admission.

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3. On July 15, 2026, Defendant filed a motion to stay discovery pending a resolution of its dispositive motion, and the Court entered an order granting the motion to stay on August 4, 2026.

4. On August 25, 2026, Plaintiff filed a motion for partial summary disposition in which it argued that by not responding to the requests for admission, the matters at issue in those requests were deemed admitted, and that against those admissions, "Defendant can justify neither the fee it charged nor the condition it placed on production." (See Pl's Motion for Partial Summ Disp, p 8.)

5. On August 26, 2026, Defendant then filed a motion under MCR 2.312(D)(1) requesting that this Court enter an order allowing the withdrawal of any matters that may be deemed admitted.

6. Because Defendant's deadline to respond to Plaintiff's motion for partial summary disposition under the Local Rules is currently due on September 8, 2026, the parties agree to a 28-day extension of that deadline so that the Court may have sufficient time to rule on the motion to withdraw before Defendant is required to respond to Plaintiff's motion for partial summary disposition.

Stipulated and agreed to:

/s/ Thomas J. Lambert w/ permission	*/s/ Adam R. de Bear*
Thomas J. Lambert (P86348)	Adam R. de Bear (P80242)
Attorney for Plaintiff	Assistant Attorney General
	Attorney for Defendant

Dated: August 27, 2026

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ORDER SETTING DEADLINE FOR DEFENDANT'S RESPONSE TO PLAINTIFF'S 8/25/26 MOTION FOR PARTIAL SUMMARY DISPOSITION

At a session of said Court, held in the City of Lansing, State of Michigan, on August 27th, 2026.

PRESENT: Michael F. Gadola
HON. MICHAEL F. GADOLA

In accordance with the foregoing stipulation of the parties, and the Court being otherwise fully advised in the premises;

IT IS HEREBY ORDERED that the deadline for Defendant to file its response to Plaintiff's Motion for Partial Summary Disposition is extended until October 6, 2026.

August 27, 2026
Date

Hon. Michael F. Gadola
Court of Claims Judge

Court of Claims
State of Michigan

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