

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

CHARLES RUSSEL, et.al.,

Plaintiffs,

v.

WAYNE COUNTY, et. al,

Defendants.

Case No. 20-cv-11094

Honorable Mark A. Goldsmith

Magistrate Judge Elizabeth A. Stafford

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**DEFENDANTS' RESPONSE TO PLAINTIFFS'**  
**MOTION FOR STAY OF PROCEEDINGS**

NOW COME Defendants, by and through the undersigned attorney, and for their Response to Plaintiffs' Motion for Stay of Proceedings state as follows:

Consistent with the email sent to Plaintiffs' Counsel on June 17, 2020, Defendants do not object to a Stay of Proceedings at this time. (Exhibit A)

Respectfully submitted,

/s/ **SUE HAMMOUD**

Wayne County Corporation Counsel

Attorney for Defendant

500 Griswold, 30<sup>th</sup> Floor

Detroit, MI 48226

(313) 224-6689

[Shammoud@waynecounty.com](mailto:Shammoud@waynecounty.com)

Attorney Bar No. 64542

Dated: June 24, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served upon the parties of record on this date, June 24, 2020 using the electronic filing system with the Clerk of the Court. I declare that the statements above are true to the best of my information, knowledge, and belief.

/s/ Sue Hammoud  
Wayne County Corporation Counsel  
Attorney for Defendants  
500 Griswold, 30<sup>th</sup> Floor  
Detroit, MI 48226  
(313) 224-6669  
Shammoud@waynecounty.com  
Attorney Bar No. 64542

# **Exhibit A**

## Sue Hammoud

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**From:** Wilson, Emily J. <EJWilson@Venable.com>  
**Sent:** Thursday, June 18, 2020 9:50 AM  
**To:** Sue Hammoud  
**Cc:** Paul T O'Neill; 'Allison Kriger'; Wayne County Covid; dami; Ashley Carter; Thomas Harvey; Miriam Nemeth; Alec Karakatsanis; Erin Keith; Jonathan Lanesky  
**Subject:** RE: Russell/Motion to Stay

Thank you, Sue. We will work up a draft for your review. I have the due date for briefing as June 25, so we will get you a draft sufficiently in advance of that to allow for time to review.

Thanks,

Emily

**Emily J. Wilson, Esq. | Venable LLP**  
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750 E. Pratt Street, Suite 900, Baltimore, MD 21202

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**From:** Sue Hammoud <Shammoud@waynecounty.com>  
**Sent:** Wednesday, June 17, 2020 1:41 PM  
**To:** Wilson, Emily J. <EJWilson@Venable.com>  
**Cc:** Paul T O'Neill <poneill@waynecounty.com>; 'Allison Kriger' <allison.kriger@gmail.com>; Wayne County Covid <WayneCountyCovid@Venable.com>; dami <animashaun@pm.me>; Ashley Carter <acarter@advancementproject.org>; Thomas Harvey <tharvey@advancementproject.org>; Miriam Nemeth <mnemeth@advancementproject.org>; Alec Karakatsanis <alec@civilrightscorps.org>; Erin Keith <ekeith@detroitjustice.org>; Jonathan Lanesky <jlanesky@chapmanlawgroup.com>; Sue Hammoud <Shammoud@waynecounty.com>  
**Subject:** Russell/Motion to Stay

**Caution: External Email**

Good afternoon Counsel,

While we believe there are arguments to be made for dismissal under abstention doctrines other than Carolina Rivers, which is what Plaintiffs rely upon for their stay of proceedings, we believe those arguments can be made at a later date. Thus, in the interest of judicial economy, we will not object to Plaintiffs' Motion for Stay of proceedings.

If you would like to prepare a proposed Stipulated Order, we will be happy to review it for entry with the Court prior to the due date for briefing. Please let me know. Thanks.

*Sue Hammoud*

**Chief Assistant Corporation Counsel-Litigation Division**  
**Wayne County Corporation Counsel**  
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