

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Russ Bellant, Detroit Library Commissioner;
Tawanna Simpson, Lamar Lemmons, Elena Herrada,
Detroit Public Schools Board Members; Donald Watkins,
And Kermit Williams, Pontiac City Council Members;
Duane Seats, Dennis Knowles, Juanita Henry, and Mary
Alice Adams, Benton Harbor Commissioners; William
"Scott" Kincaid, Flint City Council President; Bishop Bernadel
Jefferson; Paul Jordan; Rev. Jim Holley, National Board
Members, Rainbow Push Coalition; Rev. Charles E. Williams, II,
Michigan Chairman, National Action Network; Rev. Dr. Michael A.
Owens, Rev. Lawrence Glass, Rev. Dr. Deedee Coleman, Bishop
Allyson Abrams, Executive Board, Council of Baptist Pastors of
Detroit and Vicinity,

Case No. 13-cv-11370
Hon. George Caram Steeh

NOTICE OF APPEAL

Plaintiffs

v.

Richard D. Snyder, as Governor of the State of Michigan, and
Andrew Dillon, as the Treasurer of the State of Michigan,
Acting in their individual and/or official capacities

Defendants.

Herbert A. Sanders (P43031)
Attorney for Plaintiffs
The Sanders Law Firm, P.C.
615 Griswold St., Ste. 913
Detroit, MI 48226
313-962-0099/Fax: 313-962-0044
haslawpc@gmail.com

Cynthia Heenan (P53664)
Hugh M. Davis (P12555)
Attorneys for Plaintiffs
Constitutional Litigation Associates, P.C.
450 W. Fort St., Ste. 200
Detroit, MI 48226
313-961-2255/Fax: 313-922-5130
Heenan@ConLitPC.Com
Davis@ConLitPC.Com

John C. Philo (P52721)
Anthony D. Paris (P71525)
Attorneys for Plaintiffs
Sugar Law Center for Economic & Social
Justice; 4605 Cass Ave., 2nd Floor
Detroit, MI 48201
jphilo@sugarlaw.org
tparis@sugarlaw.org

Julie H. Hurwitz (P34720)
William H. Goodman (P14173)
Attorneys for Plaintiffs
Goodman & Hurwitz, P.C., behalf of Detroit
and MI National Lawyers Guild
1394 E. Jefferson Ave.
Detroit, MI 48207
313-567-6170/Fax: 313-567-4827
jhurwitz@goodmanhurwitz.com
bgoodman@goodmanhurwitz.com

Richard G. Mack, Jr. (P58657)
Keith D. Flynn (P74192)

Darius Charney
Ghita Schwarz

Attorneys for Plaintiffs

Miller Cohen, P.L.C.
600 W. Lafayette Blvd., 4th floor
Detroit, MI 48226
313-964-4454/Fax: 313-964-4490
richardmack@millercohen.com

Michael F. Murphy (P29213)
Denise C. Barton (P41535)
Ann M. Sherman (P67762)
Margaret A. Nelson (P30342)
Assistant Attorneys General
Attorneys for Defendants
P.O. Box 30736
Lansing, MI 48909
517-373-6434
Murphym2@michigan.gov
bartond@michigan.gov
Nelsonm9@michigan.gov

Attorneys for Plaintiffs

Center for Constitutional Rights
666 Broadway, 7th Floor
New York, New York, 10012
212-614-6464/Fax: 212-614-6499
dcharney@ccrjustice.org

Ghita Schwarz
Attorney for Plaintiffs
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
(212) 614-6445/Fax: (212) 614-6422
gschwarz@ccrjustice.org

Mark P. Fancher
Attorney for Plaintiffs
American Civil Liberties Union
2966 Woodward Ave
Detroit, MI 48201 Map It
(313) 578-6822/Fax: (313) 578-6811
mfancher@aclumich.org

NOTICE OF APPEAL

Notice is hereby given that all Plaintiffs appeal to the United States Court of Appeals for the Sixth Circuit from the Order Granting in Part and Denying in Part Defendants' Motion to Dismiss (Dkt. 49) entered in this action on November 19, 2014. The October 23, 2015 entry of the Stipulated Order to Dismiss Count IV (Dkt. 73) was the final order disposing of all claims and thus triggers this appeal as of right.

Respectfully Submitted,

/s/Cynthia Heenan

Cynthia Heenan (P53664)
Hugh M. Davis (P12555)
Constitutional Litigation Associates, P.C.
450 W. Fort St., Suite 200
Detroit, MI 48226
313-961-2255/Fax: 313-922-5130

Heenan@ConLitPC.Com;
Davis@ConLitPC.Com

CERTIFICATE OF SERVICE

I hereby certify that on 11/12/15, I filed *Plaintiffs' Notice of Appeal* along with this *Certificate of Service* with the ECF System which will send notice to the following:

- **Hugh M. Davis** Davis@ConLitPC.com, Info@ConLitPC.com
- **Cynthia Heenan** Heenan@ConLitPC.com, Info@ConLitPC.com
- **Richard G. Mack** richardmack@millercohen.com
cpoe@millercohen.com kflynn@millercohen.com,
kjohnson@millercohen.com, kgolba@millercohen.com,
averloren@millercohen.com, suedolesh@millercohen.com
- **Herbert A. Sanders** haslaw@earthlink.net
- **John Philo** jphilo@sugarlaw.org, mail@sugarlaw.org,
johnphilo1@comcast.net
- **Anthony Paris** tparis@sugarlaw.org, tparis11@yahoo.com
- **Bertram L. Marks** BertramMarks@aol.com
- **Julie Hurwitz** jhurwitz@goodmanhurwitz.com
- **William Goodman** bgoodman@goodmanhurwitz.com
mail@goodmanhurwitz.com
- **Darius Charney** dcharney@ccrjustice.org
- **Mark P. Fancher** mfancher@aclumich.org, bbove@aclumich.org
- **Michael F. Murphy** murphym2@michigan.gov, ballingerb1@michigan.gov, fasnaughs@michigan.gov
OV
- **Margaret A. Nelson** nelsonm9@michigan.gov, toddw1@michigan.gov, bartonb2@michigan.gov, [ol@michigan.gov](mailto:albr
ol@michigan.gov)
- **Ghita Schwarz** gschwarz@ccrjustice.org

By: /s/Jillian R. Rosati
Jillian R. Rosati
Constitutional Litigation Associates, P.C.
313-961-2255/Fax: 313-961-5999
info@ConLitPC.com