

STATE OF MICHIGAN
IN THE SUPREME COURT

Appeal from the Court of Appeals

The Honorable Pat M. Donofrio, the Honorable Kirsten Frank Kelly and the Honorable Jane M. Beckering

LORI CALDERON, as Guardian of ARTHUR
KRUMM, a Legally Incapacitated Person,

Plaintiff/Counter-Defendant/Appellee,

and

FUNCTIONAL RECOVERY, INC.,
a Michigan corporation,

Intervening Plaintiff/Appellee,

-vs-

AUTO-OWNERS INSURANCE COMPANY,

Defendant/Counter-Plaintiff/Appellant.

Supreme Court No. 138805

Court of Appeals No. 283313

Lower Court No. 06 602100 NF

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138805
reply
**DEFENDANT/COUNTER-PLAINTIFF/APPELLANT AUTO-OWNERS INSURANCE
COMPANY'S REPLY TO PLAINTIFF/COUNTER-DEFENDANT/APPELLEE'S
ANSWER IN OPPOSITION TO APPLICATION FOR LEAVE TO APPEAL**

PROOF OF SERVICE

Dated: June 10, 2009

FILED

JUN 11 2009

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CLERK
MICHIGAN SUPREME COURT

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ARGUMENT

To briefly review, this matter involves a claim for benefits under the Michigan No-Fault Act, MCL 500.3101, *et seq.*, arising out of a single vehicle accident that occurred on May 16, 2003, in North Carolina. Plaintiff's ward, Arthur Krumm, did not have no-fault insurance at the time and purportedly suffered a closed-head injury in the accident. Following the accident, Mr. Krumm was brought back to Michigan where his sister, Plaintiff/Counter-Defendant/Appellee Lori Calderon (Plaintiff), was appointed his legal guardian.

Lacking a viable alternative, Plaintiff submitted a claim for no-fault benefits on Mr. Krumm's behalf to his grandmother's no-fault insurer, Defendant/Counter-Plaintiff/Appellant Auto-Owners Insurance Company (Auto Owners). Mr. Krumm's grandmother, Beverly Krumm (Mrs. Krumm), resides in Fife Lake, Michigan and is also his adoptive mother. As required by MCL 500.3114, Mrs. Krumm's no-fault policy provided coverage for, *inter alia*, "accidental bodily injury" to "a relative...domiciled in [her] household." In an attempt to take advantage of this provision, Plaintiff claimed that Mr. Krumm was domiciled in his grandmother's home in Fife Lake, Michigan at the time of his accident in North Carolina.

Auto-Owners initially accepted the veracity of Plaintiff's representations regarding Mr. Krumm's domicile, but later discovered that Mr. Krumm was not in fact domiciled in his grandmother's home at the time of the accident. Plaintiff filed the instant action in the Wayne County Circuit Court shortly after Auto-Owners discovered her misrepresentation on this point. Functional Recovery, Inc. (Intervening Plaintiff) joined the action as an intervening plaintiff, claiming an entitlement to payment for certain medical care it purportedly provided Mr. Krumm.

S E C R E T W A R D L E

Auto-Owners subsequently brought a counter-claim against Plaintiff for the no-fault benefits it paid prior to discovering Plaintiff's misrepresentation.

Following discovery, Auto-Owners brought a motion for summary disposition of Plaintiff's Complaint under MCR 2.116(C)(10), wherein it argued that, based on the evidence, no reasonable juror could conclude that Mr. Krumm was domiciled at his grandmother's home in northern Michigan at the time of his accident in North Carolina. After hearing argument, the Honorable John A. Murphy (Judge Murphy) agreed and granted Auto-Owners' motion. An order implementing his decision was entered on July 30, 2007.

After the order was entered, Auto-Owners dismissed its counter-claim against Plaintiff without prejudice, and Plaintiff appealed. The matter was duly briefed and argued, and the Court of Appeals issued an unpublished, *per curiam* opinion on March 24, 2009. The Court of Appeals found that, when viewed in the light most favorable to Plaintiff, the evidence "clearly created a genuine issue of material fact for the jury regarding whether [Mr.] Krumm was domiciled with his grandmother in Michigan" at the time of the accident. The Court reversed Judge Murphy's decision and remanded the case for trial.

After the Court of Appeals issued its opinion, Auto-Owners prepared and filed its Application for Leave to Appeal in this Court. Plaintiff and Intervening Plaintiff (collectively "Plaintiffs") then filed their Joint Brief in Opposition to Auto-Owners' Application for Leave to Appeal on May 21, 2009. Plaintiffs' Brief contains a number of arguments in opposition to Auto-Owners' Application, which run the gamut from procedural to prudential to substantive.

Plaintiffs' Brief first suggests that the issue of an individual's domicile is not of "major significance" to this State's jurisprudence because the courts have already established factors to apply in making this determination and, in most cases, it is an easy decision. Even if the issue of

domicile was of major significance, Plaintiffs argue, the Court should not hear *this* case because it is too “factually complicated.” In addition to these procedural and prudential considerations, Plaintiffs also argue that, as a matter of substance, the Court of Appeals did not err in reversing and remanding this case for trial because genuine issues of material fact remained and the question of domicile was, therefore, a question for the jury.

As discussed in the remainder of this Reply Brief, Plaintiffs’ arguments fail on all counts. The factors established by the courts for use in making these determinations only work when they are applied to direct and credible evidence of an individual’s domicile. The system fails in cases, such as this one, where a party attempts to circumvent the normal operation of these standards by relying on speculation and conjecture. This results in “factually complicated” evidentiary records and bad law.

The courts of this State have held repeatedly that recourse to speculation and conjecture is not sufficient to survive an opposing party’s (C)(10) motion. See, e.g., *Smith v Globe Life Ins Co*, 460 Mich 446, 457; 597 NW2d 28 (1999) (holding that “mere speculation...does not rise to the level of creating a genuine issue of material fact for trial”); *Cloverleaf Car Co v Wykstra Oil Co*, 213 Mich App 186, 192-93; 540 NW2d 297 (1995) (holding that “[a] party opposing a motion for summary disposition must present more than conjecture and speculation to meets its burden of providing evidentiary proof establishing a genuine issue of material fact”); *Easley v University of Michigan*, 178 Mich App 723, 726; 444 NW2d 820 (1989) (holding “[a] statement of conclusions, unsupported by allegations of facts, will not suffice to establish a genuine issue of material fact....Allegations unsupported by some basis in fact may be viewed as sheer speculation and conjecture and, therefore, ripe for summary disposition”). As discussed below, this is precisely what Plaintiffs are attempting to do in this case. As such, this Supreme Court

should grant Auto-Owners' Application for Leave to Appeal and reaffirm the principle that a party cannot survive a properly supported (C)(10) motion by relying on witnesses' guess and conjecture.

One of the most egregious examples of Plaintiffs' attempts to muddy the factual record in this case is their reliance on the testimony of Crystal Tyner (Ms. Tyner). On pages 10 through 11 of their Brief, Plaintiffs partially quote the transcript of Ms. Tyner's deposition for the proposition that Mr. Krumm was living at his grandmother's house at the time of the accident, as evidenced by the fact that he had provided her his grandmother's contact information as his contact information, and that she had, in fact, contacted him at his grandmother's house. What Plaintiffs intentionally omitted from their rather lengthy quotation of the transcript, however, is that *all of this allegedly occurred in 1996,*¹ well before the time period at issue in this case:

Q: When did you first meet Mr. Krumm?

A: *About ten years ago.*

Q: What were the circumstances around your meeting Arthur Krumm?

A: We met at a restaurant that I worked at and we were just friends.

Q: Where was that?

A: At Western Steer I believe it was.

Q: Is that in –

A: - Winston-Salem.

Q: Was he with anyone that you knew or how did you –

¹ Ms. Tyner was deposed in 2006, wherein she testified that the events described occurred approximately 10 years prior. As such, the year 1996 is used in this Reply Brief.

A: - No. He was with whoever he was working with. It was a whole group of his work buddies.

* * *

Q: And where did Mr. Krumm work if you know?

A: I'm not sure. He worked for a roofing company.

Q: And did you ever talk with him about where he lived or where he was from or anything such as that?

A: From Michigan.

Q: What all did he tell you about what he was doing in North Carolina?

A: He was here to make money. He was here for work.

Q: Do you know how long he had been here?

A: Huh-uh.

Q: Did he tell you how long he was gonna stay here?

A: Until the job was completed.

Q: You saw him on this one occasion at Western Steer. When was the next time that you saw him?

A: I seen him every day when I worked at Western Steer.

Q: And that would have been for how long a period of time that you saw him?

A: A couple of months.

* * *

Q: Now did Arthur stop coming to the restaurant?

A: When he left.

Q: That would have been after about two months?

A: I'm not really sure. I mean, it was several months. I'm not sure. *That was ten years ago.*

Q: Did Arthur tell you he was leaving?

A: Uh-huh.

Q: What did he tell you?

A: He was going back home.

Q: Where did he say home was?

A: In Michigan.

Q: Did he tell you where in Michigan?

A: With his grandmother. He gave us the addresses and phone numbers. All his contact information.

Q: *That would have been about 10 years ago?*

A: *Uh-huh.*

Deposition of Crystal Tyner, pp. 8 -11, Ex. U in Auto-Owners' previously submitted Supreme Court Application for Leave to Appeal (emphasis added). Where Mr. Krumm was domiciled in **1996** is completely and utterly irrelevant to the determination of where he was domiciled in **2003**.² Plaintiffs' partial quotation of this testimony is nothing more than a blatant attempt to mislead this Supreme Court and manufacture a question of fact where none exists.

The rest of the testimony Plaintiffs cite in their Brief is no better. Due to page limitations, Auto-Owners is not able to rebut all of Plaintiffs' "evidence" point-by-point in this Reply Brief. However, it is clear that the remainder of the testimony Plaintiffs rely upon is nothing more than rank speculation and conjecture based on various witnesses' "beliefs" and

² In fact, on page 14 of their Brief, Plaintiffs themselves recognized that "where [Mr. Krumm] lived in 1999 or even 2002 is irrelevant to determining his domicile on May 17, 2003."

“impressions.” For example, Plaintiffs offer the following quotation from Plaintiff Lori Calderon’s deposition:

Q: You also mentioned to the investigator that *you believed* Arthur intended to return home from North Carolina sometime in May, but you weren’t sure as to what the exact date was. Is that your recollection now?

A: Yes.

Deposition of Plaintiff, Ex. A hereto, p. 15 (emphasis added). At no place in this testimony does Plaintiff specify what, if any, *facts* her “belief” was based upon. Similarly, Plaintiffs quote the following portion of the Lawrence Corbitt (Mr. Corbitt) deposition:

Q: Larry, *was it your understanding* that Arty’s home where he was always going to go back to was in Michigan?

A: Uh-huh.

Q: Okay.

A: I want to say his grandma.

Q: Right. Was—was he—did he ever tell you that he intended to stay here permanently?

A: No.

Deposition of Mr. Corbitt, Ex. B hereto, p. 30. Again, at no place in this testimony does Mr. Corbitt specify the factual basis for his “understanding” of Mr. Krumm’s subjective intentions.

In addition to their impermissible recourse to speculation and conjecture, Plaintiffs also attempt to confuse the question at issue. The question in this case is not whether reasonable jurors could reach different conclusions regarding Mr. Krumm’s place of domicile at the time of the accident. Rather, the question is whether a reasonable juror could conclude that Mr. Krumm was domiciled *with his grandmother* at that time. With the correct question in mind, this

“factually complicated” case becomes substantially less complicated as the majority of the “evidence” proffered in Plaintiffs’ Brief is merely a red herring.

Even if this Supreme Court were to accept the speculative testimony discussed above, all that much of this testimony stands for is that various individuals “understood” or “believed” that Mr. Krumm intended to, eventually, return to Michigan. The testimony of Mr. Krumm’s wife, Tonya Barber Krumm (Ms. Barber), cited in Plaintiffs’ Brief, for example, stands only for the proposition that Mr. Krumm considered Michigan to be his home:

Q: Was it your understanding and your belief that Artie always intended to return back to Michigan?

A: Yes.

Q: Is it your belief and understanding that Artie always considered Michigan his home?

A: Yes.

Deposition of Ms. Barber, Ex. G in Auto-Owners’ previously submitted Application, p. 96.

Likewise, Plaintiffs offer the following testimony of Ms. Tyner:

Q: Was there a time in May that you had a conversation with Arthur about going to Arkansas to pick up Scott Barber’s children?

A: Yes.

Q: When was that and what was the nature of that conversation?

A: He had called and was ready to leave Arkansas. He was done with whatever it was he was doing there and wanted to come visit with us for a while before he went back home to Michigan. He ran across the idea of bringing Scott Barber’s daughter back with him and I spoke to Scott Barber and he asked me to do that and I did.

Deposition of Ms. Tyner, Ex. U to Auto-Owners' previously submitted Application, p. 17. As discussed in Auto-Owners' Application for Leave to Appeal, Mr. Krumm lived at multiple locations in the State of Michigan, and only occasionally with his grandmother. As such, the fact that Mr. Krumm may have subjectively intended to return to Michigan **at some point in the indefinite future** does not establish that he was domiciled at his grandmother's home **at the time of the accident**.

Additionally, much of the "evidence" Plaintiffs rely upon does not stand for much at all. For example, Plaintiffs cite the testimony of Plaintiff for the proposition that Mr. Krumm was domiciled at his grandmother's house as evidenced by the fact that he received mail there. However, the only basis for her testimony on this point is that *she mailed birthday cards and other things to him at his grandmother's address*. Clearly, the fact that Plaintiff mailed things addressed to Mr. Krumm at his grandmother's address does not establish that Mr. Krumm was in fact domiciled there.

After contrasting this "evidence" with the undisputed facts presented to Judge Murphy, it is clear that Judge Murphy did not err in holding that no reasonable juror could conclude that Mr. Krumm was domiciled at his grandmother's house at the time of the accident. This was the undisputed evidence before Judge Murphy:

- A marriage certificate and direct, unrefuted testimony from Ms. Barber that she was married to Mr. Krumm for some years prior to, and at the time of, the 2003 accident. Plaintiff's testimony was not to the contrary—all Plaintiff really testified to was that she thought she would have been notified when Mr. Krumm got married, and that as best she could recall she had not been so notified.
- Unrefuted statements from neutral and disinterested public safety authorities that Mr. Krumm regarded the Pump Station Road house in Arkansas as his home.
- Unrefuted testimony that Mr. Krumm had resided in Arkansas for more than a year prior to the accident, except possibly for one to two short trips to Michigan and then a slightly longer one to North Carolina. He was indisputably returning

to Arkansas, not going to Michigan, from North Carolina at the time of the accident.

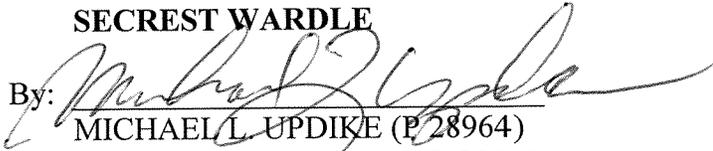
- Unrefuted evidence that Mr. Krumm had an active bank account in Arkansas.
- Testimony from Plaintiff and others that it was their “understanding” that Mr. Krumm was planning on returning to Michigan and, despite being married to Ms. Barber and helping to care for her children (that is, Mr. Krumm’s stepchildren), returning to live with his grandmother in Fife Lake at some point in the indefinite future.
- Mr. Krumm kept his childhood possessions at Mrs. Krumm’s house in Fife Lake.
- Unrefuted police records which suggested that Mr. Krumm had, so to speak, a rather nomadic lifestyle.

Based on the foregoing, Judge Murphy concluded, as he was entitled to do, that no reasonable finder of fact could conclude that Mr. Krumm was domiciled in his grandmother’s house in Fife Lake, Michigan at the time of the 2003 accident. There is no usurpation of the role of a jury when there is only one reasonable conclusion that can be drawn from the facts. See, generally, *Skinner v Square D Company*, 445 Mich 153, 164-166; 516 NW2d 475 (1994), *reh den* 445 Mich 1233 (1994). As such, the Court of Appeals erred in reversing Judge Murphy’s decision, and this Court must grant Auto-Owner’s Application for Leave to Appeal.

CONCLUSION AND REQUEST FOR RELIEF

For the foregoing reasons, Auto-Owners respectfully requests that this Court enter an Order granting the relief requested in its Application for Leave to Appeal.

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Dated: June 10, 2009

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(A)

1 awhile back. I'm going to have this marked as an exhibit.
 2 And we'll go off the record for a second to give you a
 3 chance to look it over.
 4 (Deposition Exhibit 1 marked)
 5 (Off the record)
 6 MR. KUNATH: Okay. Back on the record.
 7 Q You have had a chance to review that statement. Is there
 8 anything in it that is inaccurate or that -- well, let's
 9 just start there. Is there anything in there that's
 10 inaccurate, that doesn't accurately reflect your
 11 conversation with this investigator?
 12 A **No. I don't remember it being March, but that's it.**
 13 Q If the visit that you described earlier --
 14 A **I'm not sure --**
 15 Q -- at Beverly's house?
 16 A **-- when the month is to tell you the truth.**
 17 Q Your recollection now is that it was summer and in here it
 18 says --
 19 A **I thought it was summer because we usually go up and visit**
 20 **once or twice a year.**
 21 Q Okay. Okay. I'm curious about one of the things that was
 22 recorded there. It says that you were certain that Arthur
 23 had never been married. What made you so sure at the time
 24 that Arthur had never been married?
 25 A **He had never told me. I would be certain that he would**

1 A **Yes.**
 2 Q Do you know how Arthur got to North Carolina?
 3 A **I believe his friend Crystal.**
 4 Q Did she drive him? Did they ride a bus or fly or --
 5 A **I believe she drove.**
 6 Q And what are you basing that one?
 7 A **From what I have heard.**
 8 Q Okay. You don't have any personal knowledge regarding how
 9 he got there or who he went with?
 10 A **No.**
 11 Q The next thing I am going to hand you is the marriage
 12 license for your brother. Your attorney has just had a
 13 chance to review it. I'm passing it along to you as much to
 14 just disclose it now as for any other reason. We will mark
 15 it as an exhibit, Exhibit 2.
 16 (Deposition Exhibit 2 marked)
 17 Q What I am curious about, Lori, is whether or not you know
 18 the witnesses. Let me see if I can find their names. One
 19 of them is a Marshall A. Wiggins. Do you know a Marshall A.
 20 Wiggins?
 21 A **No.**
 22 Q The other is a Bridget L. Barber. Do you know a Bridget
 23 Barber?
 24 A **No.**
 25 **(Deposition Exhibit 3 marked)**

1 **invite me to a wedding, that's why I didn't believe he was**
 2 **married.**
 3 Q Okay. So since you never attended a wedding you just --
 4 A **No. I would hope he would invite me.**
 5 Q Okay. You weren't having any arguments with your brother
 6 pre-accident or anything that would have estranged the two
 7 of you?
 8 A **No.**
 9 Q I get the impression from reading this account that you told
 10 the investigator that Arthur had gone to North Carolina for
 11 a couple of weeks vacation; is that accurate?
 12 A **Yes.**
 13 Q Was it your understanding that Arthur was living in Michigan
 14 and left Michigan and went to North Carolina for this
 15 vacation?
 16 A **Yes.**
 17 Q Have you learned anything since that might want to make you
 18 want to reconsider or --
 19 A **No.**
 20 Q -- do you know anything different now from then?
 21 A **No.**
 22 Q You also mentioned to the investigator that you believed
 23 Arthur intended to return home from North Carolina sometime
 24 in May, but you weren't sure as to what the exact date was.
 25 Is that your recollection now?

1 Q We have just marked as Exhibit 3 and I just handed this to
 2 your attorney your letter to the district attorney in
 3 Davidson County. Would you take a moment to look it over?
 4 (Witness reviews exhibit)
 5 Q You ready?
 6 A **Yes.**
 7 Q There are a couple of statements here I -- well, let's start
 8 it this way. Is there anything in this letter that you
 9 believe now is inaccurate?
 10 A **Yes.**
 11 Q Which statements are inaccurate?
 12 A **Ms. Crystal Tyner's.**
 13 Q Okay. What was your understanding of Arthur's relationship
 14 with Crystal Tyner at the time this was written?
 15 A **When my mom and I flew after the accident happened when he**
 16 **was in a coma she had told us that they were boyfriend and**
 17 **girlfriend and were planning on getting married and then**
 18 **that same day we found otherwise that she was married**
 19 **actually. And I don't know why she told us that other than**
 20 **to not be mad at her for causing the accident. I don't know**
 21 **why, but we didn't know she was married.**
 22 Q Okay. But she told you that she intended to marry Arthur?
 23 A **Yes, she did.**
 24 Q And, obviously, that Arthur intended to marry her?
 25 A **Yes.**

(B)

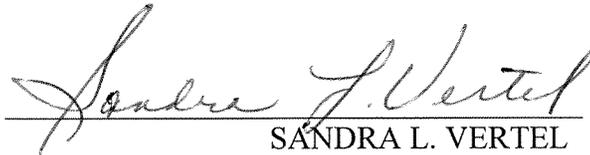
1 put him to work again.
 2 A. No. But like I said, he got a better job offer.
 3 You know, I'd go, too.
 4 Q. I see.
 5 A. You know, he was looking for money. I mean, that's
 6 -- that's what you've got to do. If I got to take off a
 7 winter and go down to Louisiana and work, you know, that's
 8 what I've got to do. I've got to keep a way to live, you
 9 know.
 10 MR. PAYETTE: Off the record.
 11 (Wherein an off-the-record discussion was held.)
 12 MR. PAYETTE: You can go back on the record
 13 now. I'm done.
 14 MR. BAGLEY: Are you done?
 15 MR. PAYETTE: Uh-huh.
 16 MR. BAGLEY: Okay. Back on the record.
 17 EXAMINATION
 18 BY MR. BAGLEY:
 19 Q. Larry, I'm Patrick Bagley, attorney for Arty Krumm.
 20 Larry, was it your understanding that Arty's home
 21 where he was always going to go back to was Michigan?
 22 A. Uh-huh.
 23 Q. Okay.
 24 A. I want to say his grandma.
 25 Q. Right. Was -- was he -- did he ever tell you that

1 (Wherein the deposition ended at 11:20 p.m.)
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1 he intended to stay here permanently?
 2 A. No.
 3 Q. Okay. Was your understanding from talking with him
 4 that he always intended to return back to Michigan?
 5 A. Yes.
 6 Q. Okay. All right. Was it your understanding that he
 7 had a bed and clothes and items at his grandma's house?
 8 A. Yeah. As far as I know, all of his values and all
 9 that -- and he just come down here with a little bit of
 10 tools and his truck and some clothes.
 11 Q. Okay. Was it your understanding he came down here
 12 because he was running from the law in Michigan?
 13 A. Yes.
 14 Q. And was your understanding he came down here to earn
 15 a little bit of money --
 16 A. Yeah.
 17 Q. -- because the work was slow?
 18 A. Uh-huh.
 19 Q. Okay. He never once told you, "I'm" -- "I've got
 20 all my belongings and I'm moving here permanently."
 21 Right?
 22 A. No.
 23 MR. BAGLEY: Okay. Larry that's all I had.
 24 Thank you for your time.
 25 THE WITNESS: Okay.

1 CERTIFICATE
 2 STATE OF ARKANSAS)
) ss
 3 COUNTY OF WASHINGTON)
 4 I, CYNTHIA A. DONALD, Certified Court Reporter, a
 5 notary public in and for the aforesaid county and state,
 6 do hereby certify that the witness, LAWRENCE ALBERT
 7 CORBITT, was duly sworn by me prior to the taking of
 8 testimony as to the truth of the matters attested to and
 9 contained therein: that the testimony of said witness was
 10 taken by me in machine shorthand and was thereafter
 11 reduced to typewritten form by me or under my direction
 12 and supervision; that the foregoing transcript is a true
 13 and accurate record of the testimony given to the best of
 14 my understanding and ability.
 15 I FURTHER CERTIFY that I am neither counsel for,
 16 related to, nor employed by any of the parties to the
 17 action in which this proceeding was taken; and, further,
 18 that I am not a relative or employee of any attorney or
 19 counsel employed by the parties hereto, nor financially
 20 interested, or otherwise, in the outcome of this action;
 21 and that I have no contract with the parties, attorneys,
 22 or persons with an interest in the action that affects or
 23 has a substantial tendency to affect impartiality, that
 24 requires me to relinquish control of an original
 25 deposition transcript or copies of the transcript before
 it is certified and delivered to the custodial attorney,
 or that requires me to provide any service not made
 available to all parties to the action.
 IN WITNESS WHEREOF, I have hereunto set my hand and
 affixed my seal of office this 30th day of October, 2006.
 CYNTHIA A. DONALD, CCR, RPR, LS #183
 NOTARY PUBLIC
 In and for the County of Washington
 State of Arkansas
 My Commission Expires:
 November 5, 2009

SANDRA L. VERTEL, first being duly sworn, deposes and states that on the 10th day of June, 2009, she served a true copy of the within *Reply to Answer in Opposition to Application for Leave to Appeal*, upon: *Patrick J. Bagley, Attorney at Law, 4540 Highland Road, Waterford, MI 48328* and *L. Page Graves, Attorney at Law, 603 Bay Street, P.O. Box 703, Traverse City, MI 49685-0705*, by depositing same in the United States mail with postage fully prepaid thereon.


SANDRA L. VERTEL

Subscribed and sworn to before me this
10th day of June, 2009.



Notary Public

MACOMB County, Michigan

Acting in OAKLAND County

My Commission Expires: 9/4/2012

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S E C R E T W A R D L E