

**STATE OF MICHIGAN
IN THE MICHIGAN SUPREME COURT**

IN RE CONTEMPT OF KELLY MICHELLE DORSEY

PEOPLE OF THE STATE OF MICHIGAN

Petitioner/Appellee

v.

TYLER MICHAEL DORSEY,

Respondent,

and

KELLY MICHELLE DORSEY,

Respondent/Appellant.

SC: 150298

COA: 309269

Livingston CC Family Division:

08-012596-DL

SUPPLEMENTAL AUTHORITY

Under MCR 7.212(F), a party may call the Court’s attention to new authority released after the party filed its brief. Although unpublished opinions may not be cited, the originally unpublished *United States v Hendrickson*, No. 15-1446 (CA 6, 2016) has now been “recommended for full-text publication.”

In *United States v Hendrickson*, the Sixth Circuit held: “As a threshold matter, the collateral bar rule prevents Hendrickson from challenging the constitutionality of the underlying order in the course of her criminal contempt proceeding.” (Slip Op, at 4) When a court has personal and subject matter jurisdiction over a case, an order issued by the court “‘must be obeyed by the parties until it is reversed by orderly and proper proceedings.’” (Slip Op, at 4-5) “Violating such an order may be punishable by criminal contempt.” (Slip Op, at 5) “[U]nder federal and state law, parties must obey injunctions issued by a court of competent jurisdiction, ‘however erroneous the action of the court may be,’ and ‘until [the issuing court’s] decision is reversed for error by orderly review, . . . disobedience . . . is contempt of [the court’s] lawful authority, to be punished.’” (Slip Op, at 5)

Respectfully Submitted,

WILLIAM J. VAILLIENCOURT (P39115)
Livingston County Prosecuting Attorney

Dated: May 5, 2016

William M. Worden

WILLIAM M. WORDEN (P39158)

Assistant Prosecuting Attorney

210 S. Highlander Way

Howell, MI 48843

(517) 546-1850