

**IN THE COMMON PLEAS COURT
MONTGOMERY COUNTY, OHIO**

MIAMI TOWNSHIP BOARD OF TRUSTEES,	:	CASE NO.: 2019 CV 05444
	:	Judge Richard Skelton
Plaintiffs,	:	
v.	:	
	:	
DARREN POWLETTE et al,	:	
	:	PLAINTIFFS MIAMI TOWNSHIP
Defendants.	:	BOARD OF TRUSTEES' LAY
	:	WITNESS DISCLOSURES

Now come the Plaintiffs, Miami Township Board of Trustees, and pursuant to the courts amended scheduling order herby provides its lay witness disclosures:

Chris Snyder
Director of Community Development
2700 Lyons Road
Miami Township, Ohio 45342

Kyle Hinkelman
Village Administrator
Village of Covington, Ohio
1 South High Street
Covington, Ohio 45318

Alex Carlson
Planner
2700 Lyons Road
Miami Township, Ohio 45342

Current or former employees of Miami Township have discoverable information concerning Defendant's contacts with Township concerning subject property, various filings submitted, zoning provisions and Defendants operation of venue in violation of zoning regulations.

Mathew Turton
6600Jamaica Road
Miamisburg, Ohio 45342

Adjacent property owner is familiar with events conducted by Defendant in violation of zoning regulations, will authenticate photos and videos of events.

Robert D. Pugh
Fire Marshall
Miami Valley Fire District
50 Lyons Road
Miamisburg, Ohio 45342

Has discoverable information on inspection of property including existing fire code violations, ongoing efforts to seek compliance.

Maury Wyckoff
Manager of Building Regulations
Montgomery County, Ohio
451 West Third Street
Dayton, Ohio 45422

Has discoverable information concerning Defendants operation of wedding venue in violation of applicable building codes and county's efforts to bring about compliance.

One or more of the renters identified in the Stoney Hill Farms Rental Agreements produced by Defendant. They all have discoverable information regarding the events at the subject property including amounts paid and services/facilities provided in exchange for payments. Contact information is presently unavailable and Defendant has refused to produce requested addresses, phone numbers and /or email addresses. Plaintiff awaiting supplementation of this information as required by the courts order-compelling Defendant to respond.

The Plaintiffs specifically reserve the right to call any witnesses identified by other parties in their disclosure of witnesses. The Plaintiffs further reserve the right to identify additional lay witnesses if, during the course of discovery, the need to do so becomes apparent.

Respectfully submitted,

/s/ Edward J. Dowd
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*Trial Attorneys for Miami Township
Board of Trustees*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March, 2021, this document was electronically filed via the Court's authorized electronic filing system, which will send notification of this filing to the following:

Gregory Page
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Dayton, OH 45459
Counsel for Defendants

/s/ Edward J. Dowd
Edward J. Dowd (0018681)