

<b>STATE OF MICHIGAN</b> JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	<b>SUMMONS</b>	<b>CASE NO.</b> <b>22-000066-MB</b> <b>Douglas B. Shapiro</b>
---	----------------	---

**Court address**  
 925 West Ottawa Street, Lansing, Michigan 48909

**Court telephone no.**  
 (517) 373-0807

Plaintiff's name(s), address(es), and telephone no(s). <b>ELIZABETH CADY STANTON TRUST</b>
Plaintiff's attorney, bar no., address, and telephone no. <b>BROWN BORKOWSKI &amp; MORROW</b> By: Mary A. Mahoney (P41568) 37887 W. 12 Mile Road Farmington Hills, MI 48331 / (248) 987-4040

v

Defendant's name(s), address(es), and telephone no(s). <b>DANA NESSEL, in her official capacity as</b> <b>Attorney General of Michigan,</b>
---

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

#### Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

#### Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

**SUMMONS**



**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date <b>May 19, 2022</b>	Expiration date* <b>August 17, 2022</b>	Court clerk <i>Jerome W. Zimmer Jr.</i>
-----------------------------------	--	--

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN  
IN THE COURT OF CLAIMS

ELIZABETH CADY STANTON TRUST,

Plaintiff,

vs.

Case No. 2022- 000066-MB

DANA NESSEL, in her official  
capacity as Attorney General of Michigan,

Douglas B. Shapiro

Defendant.

\_\_\_\_\_/

BROWN BORKOWSKI & MORROW  
By: Mary A. Mahoney (P41568)  
Attorneys for Plaintiff  
37887 West Twelve Mile Road  
Farmington Hills, Michigan 48331  
(248) 987-4040 / Fax (248) 987-4214  
mmahoney@bbmlawpc.com

\_\_\_\_\_/

**COMPLAINT FOR EQUITABLE AND  
MANDAMUS RELIEF**

**INTRODUCTION**

1. This is an action for declaratory judgment pursuant to MCR 2.605 to obtain a judicial declaration that the Equal Rights Amendment (“ERA”) is valid and enforceable. Plaintiff also seeks mandamus relief pursuant to MCR 3.305 in the form of a court order requiring the Defendant to identify and repair all sex discriminatory laws, policies and programs in Michigan, to bring them into compliance with the ERA because Defendant’s failure to identify and repair all sex discriminatory laws policies and programs is arbitrary, capricious, and/or an abuse of discretion.

2. This matter is filed with a sense of urgency because a draft decision of the United States Supreme Court was recently released, indicating that the Court is poised to overturn *Roe v. Wade*, 410 U.S. 113 (1973), a vitally important legal precedent establishing women's fundamental constitutional rights to bodily integrity and personal autonomy in the context of medical decision-making regarding whether to bear children. *Thomas E. Dobbs, et al. v. Jackson Women's Health Organization, et al.*, ("leaked opinion.") The leaked opinion overturning *Roe v. Wade* includes the statement, "no such right to abortion is implicitly protected by any constitutional provision ..." *Thomas E. Dobbs, et al. v. Jackson Women's Health Organization et al.*, at 5. This statement conflicts with the plain language of the ERA, which guarantees "equality of rights ... based on sex" as there is a constitutional provision that protects abortion - the ERA. The ability to become pregnant and have abortions is obviously a sex characteristic. Indeed, the Supreme Court itself recognized in *Planned Parenthood v. Casey*, 505 U.S. 833, 856 (1992) that "the ability of women to participate equally in the economic and social life of the Nation has been facilitated by their ability to control their reproductive lives." Clearly reproductive health regarding the decision to have a child, or not, is a sex-based issue, yet the Supreme Court's draft opinion in *Dodd* states that "*no ... right*" in the Constitution protects abortion. The draft opinion is wrong. The ERA *does* afford women protection for their abortion rights because abortion is inherently sex-based. By declaring the ERA's validity, this Court will prevent the Supreme Court from overruling *Roe* and protect women's basic human right to control their own lives.

3. The American people overwhelmingly agree that women are fully equal persons under the United States Constitution. Speaking through the states, the people finally ratified the ERA when the Commonwealth of Virginia became the last necessary state to ratify on January

27, 2020 and established the ERA as our nation's Twenty-Eighth Amendment. It states, "Equality of rights shall not be denied or abridged by the United States or by any State on account of sex."

4. By its terms, the ERA became enforceable January 27, 2022, two years after ratification. The two-year delay between ratification and enforceability is designed to give state officials time to repair laws, policies, and programs that do not comply with the ERA.

5. On numerous occasions since January 27, 2020, Defendant Dana Nessel has expressed her opinion that the ERA is now part of the Constitution. Indeed, on January 10, 2022, Nessel submitted an Amicus Brief in the case of *Commonwealth of Virginia, et al v Ferriero, et al*, U.S. Court of Appeals, D.C. Circuit Case No. 21-5096, agreeing with Appellants that the ERA is now valid, and urging reversal of the District Court Judge's conclusion that the ERA is not valid.

6. Notwithstanding Defendant's official statements that the ERA is now law, she has failed to take any steps to repair laws, policies and programs in Michigan that do not comply with the ERA, including most significantly, the statute which makes all surrogacy contracts void and unenforceable, and criminalizes surrogacy for compensation; a statute, which applies as a rule of statutory construction, that words importing the masculine gender are extended to females (but no such extension exists for words importing the feminine gender); a law that protects only females from pretextual inducement by a medical care provider to have sexual intercourse with "any man" who is not the husband of the female (but makes no such prohibition for males); a 1931 law that criminalizes any false and malicious words which "impute or attribute to any female a want of chastity"; a statute that prevents imprisonment of any female on any process in a civil action (and requires the female to sign an affidavit that she is female upon the request of

an officer); numerous uncorrected references to “female” or “females” in statutes that have long since been amended to become gender-neutral, (see, e.g. MCL 803.307a(1)(b)(vi) – referencing a “female under the age of 17 in a house of prostitution” when the underlying statute was amended in 2002 to read “person under 16”). Breastfeeding in public in Michigan was only decriminalized in 2014. Michigan continues to have among the largest gender pay gaps in the United States year after year, impacting the entire female population of the State, which is over 50% of the total State population. This is only a sampling of the many sex discriminatory laws, policies, and programs that Defendant has failed to bring into compliance with the ERA.

7. This action seeks all necessary writs and court orders that declare what the law is, and why the Defendant must immediately take steps to begin repairing all sex discriminatory laws, policies, and programs in Michigan, and bring them into full compliance with the ERA. When the ERA is declared valid, *Roe v. Wade* will be better protected against the current threat that it will be overturned, and any similar threats in the future.

### **PARTIES**

8. Defendant, Dana Nessel, is the Attorney General for the State of Michigan. She is the chief law enforcement officer for the State of Michigan, and is responsible for ensuring that Michigan is fully compliant with the United States Constitution.

9. Plaintiff, Elizabeth Cady Stanton Trust (“ECST”), is a national 501(c)(3) organization whose mission includes education and advocacy for women’s constitutional equality and rights. ECST is widely known as a leader in the women’s rights movement. It is named for famed women’s rights activist Elizabeth Cady Stanton, who authored the historic Declaration of Sentiments in 1848, which was presented at the well-known Women’s Rights Convention at Seneca Falls, Michigan. The Declaration of Sentiments was the first effort by

women in the United States to establish their constitutional equality. Its primary sentiment reads: “All men and women are created equal.” The Declaration of Sentiments was styled after the Declaration of Independence, which had been written by men decades earlier. The Declaration of Sentiments meant as a protest against the exclusion of women as fully equal persons under the Constitution. ECST was founded by Stanton’s great-great granddaughter Coline Jenkins and Marsha Weinstein in 1999 and has been working toward the establishment of women’s equality ever since. ECST has worked on behalf of Women’s equality in Michigan. For example, they have spoken to women's organizations in Kalamazoo, on the importance of equal rights for women.

### **JURISDICTION**

10. This Court has jurisdiction pursuant to MCL 600.4401 (mandamus against state officials), MCR 7.203(C)(2) (mandamus against a state officer), and MCR 7.206(B) (original actions for mandamus).

11. A declaratory judgment action is an appropriate avenue of relief where a Plaintiff seeks a determination as to a law’s constitutionality and the constitutionality of state and local laws.

### **FACTS**

12. In 1972, Congress proposed the Equal Rights Amendment as an amendment to the United States Constitution and sent it to the states for ratification.

13. Article V of the Constitution dictates that an amendment’s ratification is determined solely by the state-ratification process and provides that an amendment “...shall be valid to all intents and purposes, as part of this Constitution, when ratified by the legislatures of

three-fourths of the several states ....” Nothing more is needed. Once three-fourths of the States ratifies an amendment, it becomes law.

14. On January 27, 2020, the ERA became “valid to all intents and purposes” because Virginia became the last of three-fourths of the States to ratify it.

15. Michigan has many laws that discriminate or classify on the basis of sex, including the Michigan Constitution, but the Defendant has taken no steps to bring those laws into compliance with the ERA, leaving women in Michigan vulnerable to unequal protection of all laws, including laws that protect women’s right to decide whether to bear children.

16. The ERA is critically important to democracy. Without it, half the population of the United States, including Defendant Dana Nessel herself, enjoys less than full citizenship because the Fourteenth Amendment’s Equal Protection Clause does not equally protect women from sex-based classifications and discrimination.

17. Plaintiff and all women in Michigan have been injured, and continue to be injured, by Defendant’s failure to bring all Michigan laws, policies, and programs into compliance with the ERA as this interferes with the ERA’s vitality.

18. Plaintiff and all women have standing to seek a remedy because they have a protectable legal interest in the ERA’s continued “vitality.” *Idaho v. Freeman*, 625 F.2d 886, 887 (9<sup>th</sup> Cir. 1980).

19. Relief from this Court will protect Plaintiff and all women in Michigan, from further injury.

20. Plaintiff seeks appropriate writs, orders, and judgments from this Court to ensure that Defendant brings all Michigan laws, policies, and programs into compliance with the ERA.



## FACTS REGARDING THE CLASS OF PEOPLE AFFECTED

21. Violence against women is the product of women's inequality and is reinforced by discriminatory laws and exclusionary social norms.<sup>1</sup>

22. An average of more than five women a day are killed by men in the United States<sup>2</sup>; nearly 1 in 2 women experiences some form of sexual violence in their lifetime, 37% between the ages of 18-24.<sup>3</sup> Females are 5 to 8 times more likely than men to be victimized by an intimate partner and they suffer disproportionately high rates of domestic and dating violence,<sup>4</sup> sexual assault,<sup>5</sup> and stalking.<sup>6</sup> Only a small percentage of victims report sexual assaults to government

---

<sup>1</sup> U.N. General Assembly, 2006, *In-Depth Study on All Forms of Violence against Women: Report of the Secretary General*. A/61/122/Add.1; United Nations, New York, <http://www.un.org/womenwatch/daw/vaw/v-sg-study.htm>, February 2010; D. Rhode, *Speaking of Sex*, 1997, the Denial of Gender Inequality.

<sup>2</sup> Wilcox, Dawn, *2018 Women & Girls Allegedly Killed by Men & Boys*, WOMEN COUNT USA: FEMICIDE ACCOUNTABILITY PROJECT, (2018) <https://airtable.com/shrwuHqMomCq6uMhr/tblM2NwHxDxJVTOAp/viw9JRjeFSyTxCCtL> (identifying 1841 women and girls killed by men and boys in the U.S. in 2018. 1841 divided by 365 is 5.04).

<sup>3</sup> *Rape Prevention and Education Program*, Centers for Disease Control and Prevention, 2013. <http://www.cdc.gov/violenceprevention/rpe/>.

<sup>4</sup> U.S. DEPARTMENT OF JUSTICE, *Violence by Intimates: Analysis of Data on Crimes by Current or Former Spouses, Boyfriends, and Girlfriends*, (March 1998) (violence by an intimate partner accounts for about 21% of violent crime experienced by women and about 2% of the violence experienced by men.) 92% of all domestic violence incidents are committed by men against women; accord, U.S. DEPARTMENT OF JUSTICE, *Violence Against Women, Bureau of Justice Statistics*, January, 1994; and Koss, M.P. (1988), *Hidden Rape: Incidence, Prevalence and Descriptive Characteristics of Sexual Aggression and Victimization in a National Sample of College Students*. In Burgess, A.W. (ed.) *Sexual Assault*. Vol. II. New York: Garland Pub. (84% of raped women know their assailants and 57% of rapes occur on a date.)

<sup>5</sup> U.S. DEPARTMENT OF JUSTICE, *2003 National Crime Victimization Survey* (nine out of ten rape victims are female); Koss, M.P., id, (women aged 16-24 are four times more likely to be raped than any other population group.)

<sup>6</sup> 8% of women and 2% of men in the United States have been stalked at some time in their life. 78% of stalking victims identified in a survey were women, and 22 percent were men. Thus, four out of five stalking victims are women. By comparison, 94 percent of the stalkers identified by female victims and 60 percent of the stalkers identified by male victims were male. Overall, 87 percent of the stalkers identified by the victims were male. NATIONAL INSTITUTE OF JUSTICE *Stalking in America: Findings from the National Violence Against Women Survey*, 1998.



officials because, inter alia, they expect the government not to provide effective redress, and they fear the legal system will cause additional harm.<sup>7</sup>

23. Only 9% of all rapists are prosecuted, 5% lead to conviction, and less than 3% spend even one day behind bars.<sup>8</sup>

24. Offenders' sense of entitlement is produced by women's constitutional inequality, and fosters rape-supportive attitudes and behaviors, which is correlated with sexual aggression.<sup>9</sup>

25. One in three to one in four women is victimized by sexual assault during college.<sup>10</sup> Given that approximately 916,000 women graduated from post-secondary schools in 2009,<sup>11</sup> this means over 200,000 women are victimized by sexual assault during college. Some studies find as few as 5% of college victims file reports.<sup>12</sup>

26. Female students in the United States endure pervasive unequal treatment, harassment, and violence, on the basis of sex, throughout all levels of education.<sup>13</sup> Women also

---

<sup>7</sup> D. Kilpatrick et al., *Drug-facilitated, incapacitated, and Forcible Rape: A National Study*, 2007; U.S. Bureau of Justice Statistics, M. Planty and L. Langton, *Female Victims of Sexual Violence, 1994-2010*, 2010.

<sup>8</sup> Probability Statistics Calculated by the Rape, Abuse and Incest National Network, "Reporting Rates," 2013.

<sup>9</sup> L. Bouffard, *Exploring the Utility of Entitlement in Understanding Sexual Aggression*, 38 *Journal of Criminal Justice*, pp.870-879 (2010).

<sup>10</sup> <https://www.ncjrs.gov/pdffiles1/nij/grants/221153.pdf>, pp. xii-xiii and 2-1 (2007); U.S. Department of Justice Office of Community Oriented Policing Services, *Acquaintance Rape of College Students*, March 28, 2002, <http://www.cops.usdoj.gov/pdf/e03021472.pdf>; <https://www.ncjrs.gov/pdffiles1/nij/grants/221153.pdf>; Freyd, J. Rosenthal, M. & Smith, C., *Preliminary Results from the University of Oregon Sexual Violence and Institutional Behavior Campus Survey*, 2014, <http://dynamic.uoregon.edu/jjf/campus/UO-campus-results-30Sept14.pdf>.

<sup>11</sup> <http://www.census.gov/prod/2012pubs/p20-566.pdf>.

<sup>12</sup> B. Fischer, et al., *Sexual Victimization of College Women*, National Institute of Justice, (2000), <http://www.nij.gov/publications/pages/publication-detail.aspx?ncjnumber=182369> (5%).

<sup>13</sup> Sadker, & Zittleman, *Still Failing at Fairness, How Gender Bias Cheats Girls and Boys in School and What We Can Do About It*, Scribner Press 2009; [www.hks.harvard.edu/centers/carr/research-publications/carr-center-working-papers-series/caplan-and-ford-%22the-voices-of-diversity-%22](http://www.hks.harvard.edu/centers/carr/research-publications/carr-center-working-papers-series/caplan-and-ford-%22the-voices-of-diversity-%22).

suffer disproportionately high rates of domestic and dating violence,<sup>14</sup> sexual assault<sup>15</sup> and stalking.<sup>16</sup>

27. Because women do not enjoy full constitutional equality, they suffer disproportionately higher rates of violence, and offenders of violence against women are less likely to be held responsible compared to offenders of other types of violence.

28. Plaintiff, and all women in Michigan, have been injured, and continue to be injured, by Defendant's failure to bring all Michigan laws, policies, and programs into compliance with the ERA, as this interferes with the ERA's vitality.

29. Plaintiff, and all women, particularly the women who live and work in Michigan, have standing to seek a remedy because they have a protectable legal interest in the ERA's continued vitality. *Idaho v Freeman*, 625 F. 2d 886, 887 (9<sup>th</sup> Cir. 1980)

---

<sup>14</sup> Women are less likely than men to be victims of violent crimes overall, but women are 5 to 8 times more likely than men to be victimized by an intimate partner. *Violence by Intimates: Analysis of Data on Crimes by Current or Former Spouses, Boyfriends, and Girlfriends*, U.S. Department of Justice, March, 1998; violence by an intimate partner accounts for about 21% of violent crime experienced by women and about 2% of the violence experienced by men. *Id.* 92% of all domestic violence incidents are committed by men against women. *Violence Against Women, Bureau of Justice Statistics*, U.S. Department of Justice, January, 1994; 84% of raped women know their assailants and 57% of rapes occur on a date. Koss, M.P. (1988). *Hidden Rape: Incidence, Prevalence and descriptive Characteristics of Sexual Aggression and Victimization in a National Sample of College Students*. In Burgess, A.W. (ed.) *Sexual Assault*. Vol. II. New York: Garland Pub.

<sup>15</sup> Nine out of ten rape victims are female, U.S. Department of Justice, *2003 National Crime Victimization Survey*. 2003; Women aged 16-24 are four times more likely to be raped than any other population group. Koss, M.P., *id.*

<sup>16</sup> 8% of women and 2% of men in the United States have been stalked at some time in their life. 78% of stalking victims identified in a survey were women, and 22 percent were men. Thus, four out of five stalking victims are women. By comparison, 94 percent of the stalkers identified by female victims and 60 percent of the stalkers identified by male victims were male. Overall, 87 percent of the stalkers identified by the victims were male. National Institute of Justice 1998. *Stalking in America: Findings from the National Violence Against Women Survey*).

## **PLAINTIFF ELIZABETH CADY STANTON TRUST**

30. The Elizabeth Cady Stanton Trust (ECST) is a national 501(c)(3) non-profit organization whose mission and purpose includes educating the public about and advocating for women's rights. ECST's President, Coline Jenkins, is the great-great granddaughter of renowned women's rights leader, Elizabeth Cady Stanton.

31. ECST's involvement in this litigation is on behalf of women in Michigan and across the country who are suffering harm by Defendant's actions and inactions *because they are female*. ECST and all women have a protectable legal interest in ensuring that government officials, including the Defendant, immediately come into compliance with the ERA by repairing all sex discriminatory laws, policies, and programs.

### **COUNT I**

#### **(Twenty-Eighth Amendment)**

32. Plaintiffs repeat and reallege each of the prior allegations in this complaint

33. The ERA is now the Twenty-Eighth Amendment to the United States Constitution.

34. The ERA forbids states to have laws, policies, or programs in place that discriminate or classify on the basis of sex.

35. Michigan has many laws, policies, and programs in place that discriminate on the basis of sex, including especially the Michigan Constitution.

36. Defendant is responsible for ensuring that all laws, policies, and programs do not discriminate on the basis of sex, and fully comply with the ERA.

37. Defendant has failed to ensure that all laws, policies, and programs comply with the ERA, causing ongoing injury to Plaintiff and all women in Michigan.

## COUNT II

### (Mandamus)

38. Plaintiff repeats and realleges each of the prior allegations in this complaint.

39. Plaintiff has no plain, speedy, and adequate remedy at law, other than the remedies requested by this action.

40. Plaintiff has a clear legal right to performance of the specific duty sought.

41. Defendant has the clear legal duty to perform the act(s) requested.

42. The requested acts are ministerial.

43. No other remedy exists that might achieve the same result.

44. Defendant's failure to bring Michigan laws, policies, and programs into compliance with the ERA has caused and is continuing to cause harm to Plaintiff and all women, and is unlawful, unreasonable, and exceptional.

**WHEREFORE**, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendant and issue the following remedies:

- i. A declaratory judgment that the ERA is the duly ratified Twenty-Eighth Amendment to the U.S. Constitution;
- ii. An order requiring the Defendant immediately to take all necessary steps to ensure that all Michigan laws, policies, and programs comply with the ERA;
- iii. An order requiring Defendant to pay Plaintiff's reasonable costs and expenses of this action, including attorneys' fees;

- iv. All other relief to which Plaintiff might be entitled.

BROWN BORKOWSKI & MORROW

By: /s/ Mary A. Mahoney  
Attorney for Plaintiff  
37887 West Twelve Mile Road  
Farmington Hills, Michigan 48331  
(248) 987-4040  
mmahoney@bbmlawpc.com  
(P41568)

Dated: May 18, 2022

STATE OF MICHIGAN  
COURT OF CLAIMS

Bundle Cover Sheet

Lower Court:	L Ct No.:	COC No.: TEMP-VRYPK0M8
Case Title: ELIZABETH CADY STANTON TRUST v. DANA NESSEL		
Priority: NONE	Filing Option: File Only	

*Filer Information*

<u>Filer</u> Mary Mahoney 37887 West Twelve Mile Road Farmington Hills, MI 48331 (586) 665-3602 mmahoney@bbmlawpc.com	<u>Attorney</u> Mary Mahoney, P41568(MI) 37887 West Twelve Mile Road Farmington Hills, MI 48331 (586) 665-3602 mmahoney@bbmlawpc.com
--	---

*Filing Summary*

Filing Type	Filing Name	Fee
Summons and Complaint	Summons and Complaint for Dec and Mandamus Relief 5 18 2022	\$150.00
	eFiling System Fee:	\$25.00
	NON-REFUNDABLE Automated Payment Service Fee:	\$5.25
	<b>Total:</b>	<b>\$180.25</b>

Alternate Payment Reason: None

The document(s) listed above were electronically filed with the Michigan Court of Claims.

TEMP-VRYPK0M8-24222326

RECEIVED by MCOC 5/18/2022 4:31:59 PM

# TrueFiling Case Initiation - Summons and Complaint

**Case Title:**

ELIZABETH CADY STANTON TRUST V. DAI

**Case Type:**

MB

**Case Description:**

Mandamus: All actions for mandamus against state officials and departments

## Party 1 (Plaintiff)

**Business:** ELIZABETH CADY STANTON TRUST    **Phone:** (248) 987-4040

**Address:** 37887 West Twelve Mile Road

**City:** Farmington Hills    **State:** Michigan    **Zip:** 48331

Attorney(s) for Party 1

**Name:** Mary A. Mahoney    **Bar Number:** P41568    **(Lead Counsel)**

---

## Party 2 (Defendant)

**Name:** DANA NESSEL    **Phone:** (517) 335-7622

**Address:** 525 West Ottawa Street

**City:** Lansing    **State:** Michigan    **Zip:** 48933

**Party is Pro Se**

---