

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

JONATHAN STEWART RODEN,  
Plaintiff,

V.

DON PLONT AND TRINITY FOOD  
SERVICE GROUPS, IN INDIVIDUAL  
CAPACITY, JOINTLY, AND SEVERELY.  
Defendants.

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Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

JURY DEMAND ENDORSED

EXHIBIT C

Litigation Notice

Jonathan Roden #319782  
Kinross Correctional Facility  
4533 West Industrial Park Drive  
Kincheloe, MI 49788-1902

Litigation Coordinator (MDOC)  
C/O Warden Duncan MacLaren  
Kinross Correctional Facility  
4533 West Industrial Park Drive  
Kincheloe, MI 49788

September 26, 2017

RE: PRESERVE VIDEO FOR LITIGATION, RODEN V. PLONT

Dear Litigation Coordinator:

This letter is to inform your office that evidence pertinent and essential to litigation that will be filed against an employee/subcontractor of MDOC (Trinity Food Service and Food Steward Plant) is in your possession.


On September 14, 2017, Jonathan Roden wrote a grievance on Trinity Food Service and Food Steward Plant. Grievance Coordinator C. Anderson and Warden Duncan MacClaren rejected this grievance claiming this was a nongrievable issue. This improper rejection was simply to avoid preserving video evidence pursuant to the Grievance Policy, PD 03.02.130. This issue is clearly grievable. (Staff Retaliation).

Please suspend your regular retention and disposal schedule and preserve the following logs and videos:

- 1) All video from August 30, 2017, in the chow hall, between 1715 and 1735.
- 2) All chow hall log book entries for August 29, 2017, through August 31, 2017.
- 3) All video access logs indicating how many times this particular video was accessed and by whom.

This letter is to serve as a litigation notice requesting the preservation of material evidence mentioned above.

Respectfully requested,

  
Jonathan Roden  
311782  
9-28-17

CC: Warden D. MacClaren  
MDOC Office of Legal Affairs  
Trinity Food Service Regional Director