STATE OF MICHIGAN IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

JOHN DARISH, JOAN DARISH, GAIL NICKLOWITZ, MICHAEL NICKLOWITZ, GRACE KIM and EUGENE KIM

Plaintiffs, Case No. -CE Hon.

v.

WSG PROPERTIES, LLC, AMC-WSG, LLC and AMC-MID MICHIGAN MATERIALS LLC,

Defendants.

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There is no civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge.

COMPLAINT

Plaintiffs, by and through counsel, Flood Law PLLC, state for their Complaint for declaratory, equitable, and injunctive relief:

Parties

- Plaintiffs John and Joan Darish are resident property owners at 4715 Ridge Creek Lane,
 Ann Arbor Charter Township.
- 2. Plaintiffs John and Joan Darish's residential property is adjacent to the east side of Defendants' mine. (Exhibit 1 illustrates the locations of the Plaintiffs' properties relative to Defendants' mine.)
- Plaintiffs John and Joan Darish have a residential drinking water well on their property,
 Well ID 81000024062.
- 4. Plaintiffs John and Joan Darish use their residential drinking water well to supply all their household natural uses.
- 5. Plaintiffs John and Joan Darish's residential property includes wetlands, an unnamed stream, and a portion of Massey Lake shoreline and bottomlands.
- 6. Plaintiff John Darish uses his residential property, including the stream and Massey Lake shoreline and bottomlands, for recreation, fishing, and canoeing.
- 7. Plaintiffs Gail and Michael Nicklowitz are residents at Nicklowitz Family Trust-owned property at 4460 Earhart Road, Ann Arbor Charter Township.
- 8. Plaintiffs Gail and Michael Nicklowitz's residential property is adjacent to the south side of Defendants' mine.
- Plaintiffs Gail and Michael Nicklowitz have a residential drinking water well on their property, Well ID 81000004744.
- 10. Plaintiffs Gail and Michael Nicklowitz use their residential drinking water well to supply all their household natural uses.

- 11. Plaintiffs Gail and Michael Nicklowitz use their residential property for a horse stable and trotting grounds, deer hunting, and other outdoor recreation.
- 12. Plaintiffs Grace and Eugene Kim are resident property owners at 4823 Ridge Creek Lane,
 Ann Arbor Charter Township.
- 13. Plaintiffs Grace and Eugene Kim's residential property is east of Defendants' mine, adjacent to and east of Plaintiffs John and Joan Darish.
- Plaintiffs Grace and Eugene Kim have a residential drinking water well on their property,
 Well ID 81000023187.
- 15. Plaintiffs Grace and Eugene Kim use their residential drinking water well to supply all their household natural uses.
- 16. Plaintiffs Grace and Eugene Kim's residential property includes a portion of Massey Lake shoreline and bottomlands.
- 17. Plaintiff Eugene Kim uses his residential property, including the Massey Lake shoreline and bottomlands, for recreation, fishing, and canoeing.
- 18. Defendant WSG Properties, LLC ("WSG Properties") is the real property owner of the Defendants' mine at 4984 Earhart Road, Ann Arbor Charter Township, Parcel ID I09-01-200-002.
- Defendant WSG Properties, LLC's recorded tax address for the Ann Arbor Charter
 Township property is 6966 Fisher Road, Jeddo, Michigan.
- 20. Defendant WSG Properties, LLC has owned the mine property since 2020.
- 21. Defendant AMC-WSG, LLC is the lessee of Defendant WSG Properties, LLC's mine property.

- 22. On September 1, 2020, Defendant AMC-WSG, LLC and Defendant WSG Properties, LLC entered into a lease agreement for "operation of a mining [sic], marketing and selling sand, stone, gravel and other aggregates, and related activities."
- 23. The September 1, 2020, lease agreement provides the same address and contacts for both lessee Defendant WSG Properties, LLC and lessor Defendant AMC-WSG, LLC as "1957 Crooks, Suite 100, P.O. Box 7058, Troy, Michigan 48084, Attn: Jim Friel; James Jacob."
- 24. Defendant AMC-WSG, LLC has held itself out as a permit applicant and property owner of the mine to EGLE for permitting and compliance since at least 2023.
- 25. Defendant AMC-WSG, LLC has provided a contact address of 4984 Earhart Road, Ann Arbor Charter Township, in its EGLE filings
- 26. Defendant AMC-Mid-Michigan Materials LLC has held itself out as the mine operator to EGLE for permitting and compliance since at least 2023.
- Defendant AMC-Mid-Michigan Materials LLC has provided a contact address of 4984
 Earhart Road, Ann Arbor Charter Township, in its EGLE filings.

Jurisdiction, and Venue

- 28. This Court has jurisdiction to hear the claims in this Complaint and grant the relief requested under authorities including, but not limited to MCL 324.1701, *et seq*. (Actions for declaratory and equitable relief for environmental protection;); MCL 600.601 (Circuit court jurisdiction and power); MCL 600.605 (Circuit court original jurisdiction); MCR 2.605 (Declaratory judgments); and MCR 3.310 (Injunctions).
- 29. Venue is proper in this Court under MCL 600.1621(a) and 600.1627 because Washtenaw County is the county in which Defendants' conduct their mining operation and all related business relevant to this dispute and Plaintiffs' causes of action.

General Allegations

- Defendants have owned and/or operated a gravel mine located at 4984 Earhart Road, Ann
 Arbor Charter Township since 2020.
- 31. Defendants began pumping groundwater and discharging the water offsite in April 2022.
- 32. Defendants' pump capacity was over 2 million gallons per day when pumping began in April 2022.
- 33. On September 14, 2023, the Michigan Department of Environment, Great Lakes, and Energy ("EGLE") issued Violation Notice No. VN-014898 to Defendants for violations of the following provisions of the Michigan Natural Resources and Environmental Protection Act: Part 31, Water Resources Protection; Part 91, Soil Erosion and Sedimentation Control; Part 301, Inland Lakes and Streams; Part 303, Wetlands Protection; and Part 327, Great Lakes Preservation.
- 34. The EGLE Violation Notice stated: "Mining of the Southern Lake: A review of aerial imagery has identified that a waterbody with an approximate area of 2.66 acres was present in the southwest of the site in 2020 when the site was purchased by MMM. This waterbody was expanded through mining operations by MMM in 2021 and 2022 and resulted in creation of approximately five (5) acres of surface water, which is considered a lake under Part 301, Inland Lakes and Streams, of the NREPA [MCL 324.30101 et. seq.]. Aerial imagery from 2021 and 2022 shows the presence of this approximate five (5) acre lake until pumping operations began in 2022. The subsequent pumping operation has now drawn down the surface water and drained the lake. The creation, enlargement or diminishment of a lake requires a permit under Part 301. No permits have been applied for nor issued for this activity and is therefore in violation of Part 301."

- 35. The EGLE Violation Notice also required Defendants to reduce their pump capacity or obtain a permit for their capacity pump pursuant to MCL 324.32701 et. seq. (Great Lakes Preservation).
- 36. The EGLE Violation Notice further stated that EGLE staff observed that Defendants' discharge polluted Massey Lake, Flemming Creek, wetlands, and an unnamed tributary stream.
- 37. The EGLE Violation Notice stated that the violations were "continuing."
- 38. On September 28, 2023, Ann Arbor Charter Township filed a lawsuit in this Court against the Defendants. See Washtenaw County Circuit Court Case No. 23-001234-CE, Ann Arbor Charter Township Verified Complaint.
- 39. Ann Arbor Charter Township's complaint alleged that Defendants' pumping of groundwater was harming residential wells.
- 40. Ann Arbor Charter Township's complaint alleged that "the wells at the following properties have been adversely impacted by Defendants' operations..." with a listing that included the residences of Plaintiffs John and Joan Darish and Gail and Michael Nicklowitz.
- 41. Ann Arbor Charter Township's complaint alleged that Defendants' mining operations were in violation of the Ann Arbor Charter Township's Conditional Use Permit.
- 42. On September 29, 2023, Ann Arbor Charter Township moved this Court for a preliminary injunction. See Case No. 23-001234-CE, Ann Arbor Charter Township's *Ex Parte* Motion for Temporary Restraining Order and Preliminary Injunction.

- 43. On October 10, 2023, this Court issued a preliminary injunction order against Defendants halting their mining operation. See Case No. 23-001234-CE, Order Granting Preliminary Injunction.
- 44. This Court's October 20, 2023, Stipulated Clarification to Order Granting Preliminary Injunction included an "Exhibit A" with Defendants' own illustration of their "Vella Pit Operations" in 2023. This illustration of the Defendants' mining site and operation in 2023 is reproduced below and attached as Exhibit 2.

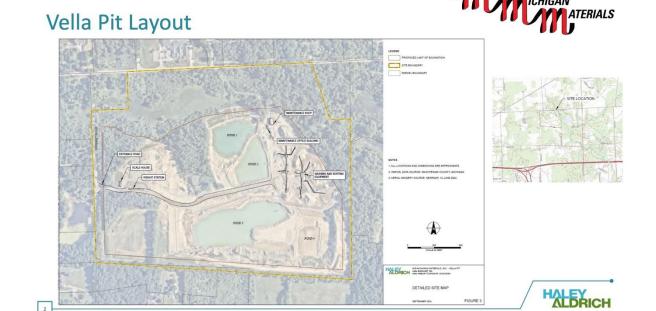


45. On October 20, 2023, this Court issued a stipulated clarification to its preliminary injunction to order that: "Defendants are prohibited from discharging process waste water or groundwater from the NPDES discharge pipe, as indicated on Exhibit A hereto, or otherwise causing a net loss of groundwater from the site." See Case No. 23-001234-CE, Stipulated Clarification to Order Granting Preliminary Injunction.

- 46. On July 3, 2024, this Court issued a Stipulated Order allowing a limited "Dredging Trial Period." See Case No. 23-001234-CE, Stipulated Order Regarding Temporary Dredging Operations.
- 47. On September 30, 2024, this Court issued a Stipulated Order extending the limited "Dredging Trial Period" to October 15, 2024. See Case No. 23-001234-CE, Stipulated Order Extending Dates of Temporary Dredging Operations.
- 48. This Court has not issued any orders allowing any other extension or permission of a limited "Dredging Trial Period" beyond October 15, 2024.
- 49. The Ann Arbor Charter Township's case before this Court is still ongoing. See Case No.23-001234-CE, Stipulated Order Extending Administrative Stay.
- 50. After the EGLE Violation Notice and this Court's prior preliminary injunction orders issued in 2023, Defendants changed their operation to create and enlarge a lake and mine its bottomlands instead of mining dry land.
- 51. Defendants created and enlarged the lake from nothing to approximately 2 acres in 2023.
- 52. Defendants have further enlarged the lake to approximately 15 acres in 2025.
- 53. Defendants have stated that they are continuing to enlarge the lake.
- 54. Defendants' estimate that they will enlarge the lake to an eventual 59 acres.
- 55. Creating and enlarging a lake is expressly and clearly prohibited by Michigan's Inland Lakes and Stream Act, MCL 324.30102(1)(d), which states "a person without a permit from the department shall not ... [c]reate, enlarge, or diminish an inland lake or stream."
- 56. Defendants do not and have never had an EGLE permit to create or enlarge the lake.
- 57. Defendants do not have a permit to create or enlarge the lake, despite filing at least two "after-the-fact" permit requests since the EGLE violation notice in 2023.

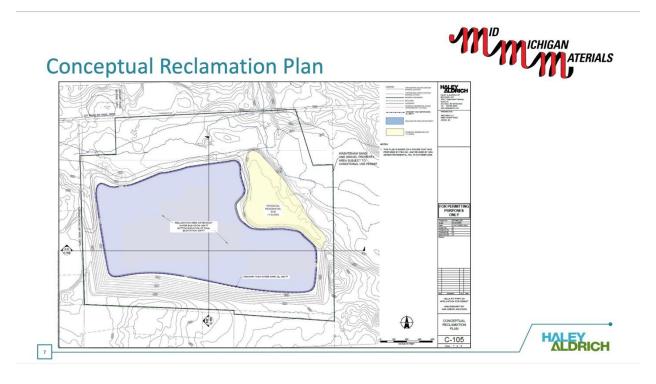
- 58. Starting in October 2023, Defendants began mining the newly created and enlarged lake bottomland.
- 59. Dredging and mining the lake bottomland is expressly and clearly prohibited by Michigan's Inland Lakes and Stream Act, MCL 324.30102(1)(a)-(b), which states "a person without a permit from the department shall not ... [d]redge or fill bottomland; [c]onstruct, enlarge, extend, remove, or place a structure on bottomland."
- 60. Defendants do not have, and have never had, an EGLE permit to dredge the lake bottomlands or conduct any mining activity on the illegally created and enlarged lake's bottomlands.
- 61. On December 21, 2023, Defendants submitted an application to EGLE for a permit pursuant to the Inland Lakes and Streams Act to enlarge a lake. (Defendants used the EGLE and U.S. Army Corps of Engineers' "Joint Permit Application" that covers numerous water protection and regulatory statutes.) See EGLE file no. HPB-72AQ-79WYR, Joint Permit Application, version 1.
- 62. Defendants' December 21, 2023 permit application was made *after* Defendants were already enlarging the lake without a permit.
- 63. In Defendants' December 21, 2023 permit application, Defendants affirm that they were submitting an "after-the-fact" application
- 64. In Defendants' December 21, 2023 permit application, Defendants affirm that they were "aware of [] unresolved violations of environmental law."
- 65. In Defendants' December 21, 2023 permit application, Defendants state: "Pond 3 [Defendants' label for the enlarged lake] surface water acreage has grown since pumping ceased in October 2023. While [Defendants have] an EGLE [] permit to discharge mining

- wastewater to a tributary of Fleming Creek north of Pond 1, on October 10, 2023 Ann Arbor Township claimed the discharge was in violation of the Conditional Use Permit and required that pumping be discontinued immediately. As a result, Pond 3 has grown larger than five acres very quickly after pumping ceased."
- 66. Defendants' December 21, 2023 permit application did not disclose Defendants' plan to mine and dredge the enlarged lake bottomlands.
- 67. On May 5, 2025, Defendants submitted a revised application to EGLE for a permit pursuant to the Inland Lakes and Streams Act to create and enlarge the lake to 59 acres. See EGLE file no. HPB-72AQ-79WYR, Joint Permit Application, version 2.
- 68. Defendants' 2025 permit application inleudes an illustration of their mining operation in 2025, depicting the enlarged lake at about 15 acres. (Exhibit 3.)
- 69. Defendants' 2025 permit application includes an illustration of their future site plan depicting the enlarged lake at 59 acres. (Exhibit 4.)
- 70. Illustrations of the Defendants' mining site in 2025 (exhibit 3) and as planned in the future (exhibit 4) are reproduced below:



Above – Defendants' site in 2025 with approximately 15 acres of enlarged lake. (Exhibit 3.)

Below – Defendants' planned site with the lake enlarged to 59 acres. (Exhibit 4.)



- 71. In Defendants' May 5, 2025 permit application, Defendants revised their project description to include mining the created and enlarged lake.
- 72. In Defendants' May 5, 2025 permit application, Defendants state: "Post mining/restoration activity includes creating a lake and future residential use. Planned operation will be a combination of dragline dredging and long arm excavating from the newly created Pond 3."
- 73. In Defendants' May 5, 2025, permit application, Defendants admit that their ongoing and planned operation is to mine the lake itself.
- 74. In Defendants' May 5, 2025, permit application, Defendants state: "MMM intends to continue mine activities for up to another 20 years. Mining will be conducted 'in the wet' using long arm excavators and dragline dredging."
- 75. In Defendants' May 5, 2025, permit application, Defendants submitted a required hydrological study prepared by Haley & Aldrich of Michigan, Inc. for Defendants (dated September 27, 2024).
- 76. Defendants' hydrological study estimated that the created and enlarged lake will eventually enlarge to 59 acres.
- 77. Defendants' hydrological study further described Defendants' lake mining operation as "pilot testing."
- 78. Defendants' hydrological study states: "While dewatering was previously performed to facilitate excavation in the dry, MMM is currently pilot testing removal via mechanical dredging beneath the surface of Pond 3."
- 79. Defendants' hydrological study observed that the enlarging lake is connected to groundwater.

- 80. Defendants' hydrological study concluded that the enlarging lake is being fed by groundwater.
- 81. Defendants' hydrological study concluded that the enlarging lake will be a source of pollution back into the aquifer from precipitation and surface water runoff.
- 82. Defendants' hydrological study states "Pond 3 is expected to reach equilibrium with the surrounding Upper Aquifer materials, with decreasing groundwater flow towards Pond 3 and potentially increased flow from Pond 3 into the Upper Aquifer as Pond 3 captures precipitation and surface water runoff. The Site is anticipated to continue to be a primary recharge area to the Upper Aquifer where the Upper Aquifer materials are exposed at the ground surface."
- 83. Defendants' hydrological study submitted with their May 5, 2025, permit application does not discuss the impacts to connected groundwater resulting from Defendants mining the lake bottomlands.
- 84. Defendants continued to dredge and mine the lake bottomlands throughout 2025.
- 85. On July 21, 2025, Defendants presented a powerpoint slide at the public hearing regarding their permit application with an illustration of their mining operation in 2025 depicting the enlarged lake at about 15 acres. (Exhibit 3.)
- 86. On July 21, 2025, Defendants presented a powerpoint slide at the public hearing regarding their permit application with an illustration of their future site plan depicting the enlarged lake at 59 acres. (Exhibit 4.)
- 87. On July 21, 2025, Defendants stated at the public hearing regarding their permit application that they were "already" doing what they were seeking permission to do in their permit application.

- 88. EGLE has *not* granted the Defendants' "after-the-fact" permit application for enlarging the lake.
- 89. EGLE has *not* granted the Defendants' permit application for dredging and mining the lake bottomlands.
- 90. EGLE's most recent public documentation states that Defendants have not even been able to accurately model or predict the impacts of enlarging and mining a lake of this size on the groundwater that supplies local drinking water.
- 91. The enlarging lake sits on top of the area's groundwater that supplies Plaintiffs' residential drinking wells and many other residents in Ann Arbor Charter Township.
- 92. Defendants illegal and unpermitted mining of the lake bottomlands creates additional harm and significant risk to the residential groundwater users and groundwater dependent natural resources.
- 93. Despite this basic understanding of hydrology and risks to the community's water,

 Defendants have proceeded without the legally required permission from EGLE.
- 94. Defendants' enlargement of the lake pollutes, impairs, and destroys Michigan's water and related natural resources.
- 95. Defendants' dredging and mining of the lake bottomland pollutes, impairs, and destroys Michigan's water and related natural resources.
- 96. Defendants' enlargement of the lake harms Plaintiffs' protected property interests including groundwater use.
- 97. Defendants' dredging and mining of the lake bottomland harms Plaintiffs' protected property interests including groundwater use.
- 98. Defendants' enlargement of the lake harms Plaintiffs' protected public interests.

- 99. Defendants' dredging and mining of the lake bottomland harms Plaintiffs' protected public interests.
- 100. Defendants' enlargement of the lake warrants immediate injunctive relief by this Court.
- 101. Defendants' dredging and mining of the lake bottomland warrants immediate injunctive relief by this Court.
- 102. Defendants' mining operation is likely to materially diminish, reduce, and adversely impact the quantity and quality of groundwater and connected surface waters and other natural resources of the Plaintiff properties.
- 103. Municipal water is not available to residents in this area.
- 104. Defendants' unlawful mining activities since 2023 cause excessive noise, vibrations, and dust.
- 105. Defendants' truck traffic deteriorates local dirt roads causing dust and other pollution.
- 106. Defendants' truck traffic creates excessive noise, vibrations, and risk of public injury operating prior to the township's allowed 7:00 a.m. start time.
- 107. Defendants' truck traffic harms water and other natural resources when trucks drive off the local dirt roads, tipping over and dumping the mined materials into wetlands, such as occurred on November 19, 2025.

COUNT I MICHIGAN ENVIRONMENTAL PROTECTION ACT

- 108. Plaintiffs reallege and incorporate by reference the allegations contained in the previous and subsequent paragraphs.
- 109. The Michigan Constitution establishes the protection of public health, welfare, and the environment as a paramount concern for state government. Article IV, Section 52 of the Michigan Constitution provides:

"The conservation and development of the natural resources of the state are hereby declared to be of paramount public concern in the interest of the health, safety and general welfare of the people. The legislature shall provide for the protection of the air, water and other natural resources of the state from pollution, impairment and destruction."

- 110. The Legislature fulfilled its duty to protect the environment by passing the Michigan Environmental Protection Act (MEPA), MCL 324.1701 et seq.
- 111. MEPA provides that "any person" may bring an action in circuit court for the "protection of the air, water or other natural resources and the public trust in these resources from pollution, impairment or destruction." MCL 324.1701(1).
- 112. MEPA provides that a circuit court "may grant temporary and permanent equitable relief or may impose conditions on the defendant that are required to protect" the State's natural resources. MCL 324.1704(1).
- 113. Defendants' mining operations are polluting, impairing, and destroying groundwater, surface water, and other natural resources.

COUNT II VIOLATION OF RIPARIAN RIGHTS BY A NONRIPARIAN

- 114. Plaintiffs reallege and incorporate by reference the allegations contained in the previous and subsequent paragraphs.
- 115. Massey Lake in Washtenaw County is a natural body of surface water in Michigan that is subject to the common law of riparian rights.
- 116. Plaintiffs John and Joan Darish and Grace and Eugene Kim possess riparian rights to Massey Lake because they own parcels of land that are adjacent to the lake.
- 117. Defendants do not possess riparian rights to Massey Lake because their property located at 4984 Earhart Road is not adjacent to Massey Lake.

- 118. Plaintiff John Darish uses Massey Lake for reasonable recreational purposes, such as canoeing, fishing, and hiking along the banks.
- 119. Plaintiffs Eugene Kim uses Massey Lake for reasonable recreational purposes, such as canoeing, fishing, and hiking along the banks.
- 120. Defendants' mining operations are unreasonably interfering with and violating Plaintiffs' riparian rights.

COUNT III PRIVATE NUISANCE

- 121. Plaintiffs hereby reallege and incorporate by reference the allegations contained in the previous and subsequent paragraphs.
- 122. Defendants' unlawful mining activities have caused, and will continue to cause, vibrations, noise and dust.
- 123. Defendants' mining activities are creating and maintaining a nuisance that interferes with the quiet use and enjoyment of Plaintiffs' properties.

<u>COUNT IV</u> PUBLIC NUISANCE

- 124. Plaintiffs hereby reallege and incorporate by reference the allegations contained in the previous and subsequent paragraphs.
- 125. Defendants' unlawful mining activities have caused, and will continue to cause, harm to the public's general interest in air, water, and other natural resources.

COUNT V DECLARATORY AND INJUNCTIVE RELIEF

126. Plaintiffs hereby reallege and incorporate by reference the allegations contained in the previous and subsequent paragraphs.

- 127. There is an actual, justiciable controversy between the parties and a declaratory judgment under MCL 324.1701 and MCR 2.605 is appropriate.
- 128. Defendants' conduct has caused immediate and irreparable harm.
- 129. Defendants continue to pollute, impair, and destroy water and other natural resources.
- 130. Defendants have stated an intent to continue enlarging the lake even without the required EGLE permit.
- 131. Defendants have stated an intent to continue mining the enlarged lake even without the required EGLE permit.
- 132. Plaintiffs will continue to suffer far more harm if an injunction is not granted than Defendants will suffer if an injunction is granted.
- 133. Plaintiffs have demonstrated a likelihood of success on the merits of their claims such that a preliminary injunction is proper. See MCL 324.1701 and MCR 3.310 (Injunctions).
- 134. MEPA provides that a court "may grant temporary and permanent equitable relief or may impose conditions on the defendant that are required to protect" the State's natural resources. MCL 324.1704(1).
- 135. Defendants' illegal mining operations must cease immediately and permanently to protect Michigan's natural resources.
- 136. Defendants must further be required to fully reclaim, remediate, and restore the site from all harm they have caused to protect Michigan's natural resources and Plaintiffs' rights and interests.

REQUEST FOR RELIEF

Based on these allegations, Plaintiffs John Darish, Joan Darish, Gail Nicklowitz, Michael Nicklowitz, Grace Kim, and Eugene Kim request this Honorable Court enter a judgment in their

favor against Defendants WSG Properties, LLC, AMC-WSG LLC, and AMC-Mid-Michigan Materials LLC.

Plaintiffs are not requesting monetary damages and are only requesting the following declaratory, equitable, and temporary and permanent injunctive relief:

- A. Declare that Defendants' mining operation is presently unlawful;
- B. Grant a temporary injunction that ceases Defendants' illegal mining operation, including enlarging and mining a lake, unless or until permitted by EGLE;
- C. Grant a permanent injunction against any pollution, impairment, and destruction of groundwater and other natural resources by Defendants;
- D. Grant a permanent injunction against Defendants' interference with quiet use and enjoyment of property and riparian uses of Massey Lake;
- E. Order Defendants to reclaim, remediate, and restore the site from all harm they have allowed and/or caused;
- F. Award Plaintiffs such other relief as this Court deems just and proper.

Respectfully submitted,

Dated: December 15, 2025

FLOOD LAW, PLLC

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Exhibit 1: Satellite Plat Map of Plaintiffs' Properties and Defendants' mine.



Document received by the Washtenaw County Trial

Illustration of the Defendants' mining site and operation in 2023, reproduced from Exhibit A to this Court's Stipulated Clarification to Order Granting Preliminary Injunction, Case No. 23-001234-CE (October 20, 2023).

Vella Pit - Operations



- Active mining area
- Reservoir of water for wash plant
- Settling pond
- NPDES outfall to wetlands (further discharge prohibited)
- Settling pond for wash plant return water

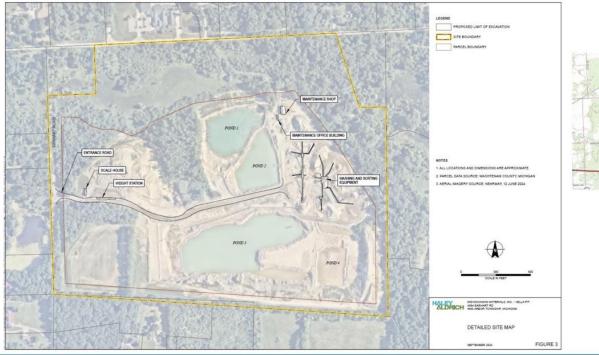
→ Water flow direction



Document received by the Washtenaw County Trial Court 12/15/2025.

Illustration of the Defendants' mining site and operation in 2025, from Defendants' Joint Permit Application, version 2, EGLE file no. HPB-72AQ-79WYR (May 5, 2025).

Vella Pit Layout





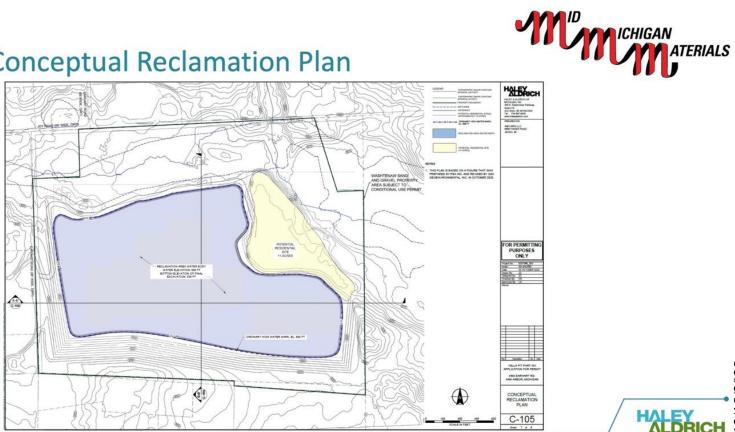
ID ICHIGAN ATERIALS



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Illustration of the Defendants' future planned lake and site, from Defendants' Joint Permit Application, version 2, EGLE file no. HPB-72AQ-79WYR (May 5, 2025).

Conceptual Reclamation Plan





Document received by the Washtenaw County Trial Court 12/15/2025.