

EXHIBIT D

LEVY KONIGSBERG LLP
ATTORNEYS AT LAW
605 THIRD AVENUE, 33RD FLOOR
NEW YORK, NY 10158

NEW JERSEY OFFICE
QUAKERBRIDGE EXECUTIVE OFFICE
101 GROVERS MILL ROAD
LAWRENCEVILLE, NJ 08648
TELEPHONE: (609) 720-0400
FAX: (609) 720-0457

(212) 605-6200
FAX: (212) 605-6290
WWW.LEVYLAW.COM

ALBANY OFFICE
90 STATE STREET
ALBANY, NY 12207
TELEPHONE: (518) 286-5068

WRITER;S DIRECT E-MAIL:
CSTERN@LEVYLAW.COM

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VIA EMAIL & CERTIFIED MAIL (RRR)

J. Michael Huget, Esq.
Leonard M. Niehoff, Esq.
Honigman, LLP
660 Woodward Ave # 2290
Detroit, MI 48226

RE: REQUEST TO PRESERVE DOCUMENTS & TANGIBLE THINGS
DEFAMATION – DETROIT NEWS & HONIGMAN

Mr. Huget, Mr. Niehoff:

My name is Corey Stern.

In 2016, I was appointed *Lead Counsel* in the Genesee County Circuit Court for all plaintiffs associated with the Flint Water Crisis. In 2017, I was appointed *Liaison Counsel* for all individual plaintiffs in the federal litigation.

As you are aware, one of your colleagues, the late Senator Carl Levin worked with me and other attorneys (on both sides of the “v”) to create a \$626.5 million settlement for the residents of Flint. Furthermore, and as you are also aware, one of your clients – the Detroit News – has been covering the Flint Water Crisis since it began in 2014.

Yesterday, your client published an Op-ed written by Tiger Joyce (the head of the American Tort Reform Association), which attacked me, by name, and included a number of false and defamatory claims about me, which, based on the Detroit News’ extensive reporting of the water crisis for close to ten years, it knew to be false, and based on Honigman’s participation in the settlement, it too knew to be false.

As bad or worse, this was a coordinated hit-piece, written, edited and published in an effort to get ahead of or respond to an actual news article, that by all accounts has been researched and sourced (though not yet printed), by the same entity, wherein there is apparently information related to Veolia’s attempts to influence the jury in the recent bellwether trial, as well as potential jurors going forward in future trials.

I obviously am not a reporter. I did not bring the story to the Detroit news. I knew nothing about it, until I was contacted within the last week for a comment. Yet I find myself, today, the subject of a false and defamatory Op-ed/hit-piece, intended to discredit me, impact my career, and embarrass me, with the ultimate goal of discrediting a story that may or may not get published by your client, related to Veolia and LAN (the two bellwether trial defendants), which I have nothing to do with, directly.

Make no mistake, Mr. Joyce is working with defendants' and their public relations firms, including but not limited to RISE Strategy Group, and others.

Furthermore, if Honigman was consulted **at all** before the article was published, it too is complicit.

Here are a few of the most egregious parts of the piece, with my comments:

*“Instead, this latest civil trial has exposed the true intentions of the plaintiffs’ attorneys involved: to **get rich by bankrupting companies with deep pockets.**”*

- To date there has never been a conversation by/with anyone about bankruptcy proceedings.

“So why bring additional litigation against two engineering companies who claim they were kept out of the loop or only entered the Flint water crisis after lead was already detected?”

- The lawsuits against LAN and Veolia were actually brought by my firm before we sued anybody else, and were ultimately made part of the same lawsuit against the governmental entities. Make no mistake, the lawsuits against these private companies either came first or simultaneous with the lawsuits that have been filed since late 2015.
- Your client, and your law firm, are intimately aware of that fact. This statement is completely false, and when taken in conjunction with naming me directly is defamatory.

*“The trial lawyers’ incendiary statements seem to indicate that it’s because **the \$200 million in legal fees they collected from the original settlement was not enough.**”*

- Not a single lawyer has been paid a single dollar as part of the Flint litigation. The partial settlement, which your firm helped create, by way of Senator Levin, is on appeal. My law firm has expended over \$3 million out of pocket prosecuting these claims, and to date has not received a dime.
- Not only is your law firm intimately aware of this fact, but your client is intimately aware of this fact. This statement, when taken in conjunction with calling me out by name earlier in the piece, is defamatory.

“These abuses can have devastating impacts on businesses, large and small. But more importantly, it often ends with trial lawyers taking home millions while real victims are left with pennies. That was the case in the original 2021 Flint water settlement where victims took home on average only \$4,500 each.”

- Not one resident of Flint has received any money from the settlement. Additionally, to the extent the 6th Circuit affirms the Court’s approval of the settlement, the settlement does not award an equal amount of money to anybody. Both your law firm, through Senator Levin, as a creator of the settlement, and the Detroit news, as one of the major media outlets covering the settlement, knows this intimately. This statement is false and defamatory when taken in conjunction with calling me out by name earlier in the piece.

“Compared to the millions that trial attorneys received, former mayor of Flint Karen Weaver responded calling the 2021 settlement, “a slap in the face” and saying “this was not justice for the people of the city of Flint.””

- See above. No lawyers (except defense counsel and your firm) have received a dime.

I and my team have zero doubt that this hit piece was part of an effort to protect the trial Defendants from what they anticipated would be a story that could affect the way they are viewed publicly and by the Court, for what may have been incendiary conduct during and prior to the recent bellwether trial.

I also have reason to believe that Gary Miles, from the Detroit News, was instrumental in placing the piece, knowing full well that its contents are false and defamatory, and that Brendon Cleary was complicit in placing the piece, knowing full well that it is substantively dishonest and overtly defamatory.

In light of Honigman’s participation in the settlement, and it’s long and extensive representation of the Detroit News, please consider this communication my formal demand that your law firm maintain any and all documents associated with all communications with anyone from the Detroit news, since January 1, 2015 related in any way whatsoever to the Flint Water Crisis Team.

Furthermore, if Honigman approved, read, edited, or advised the Detroit News regarding the hit-piece, please put Honigman’s insurance carrier on notice of what I promise you will be a claim against your firm.

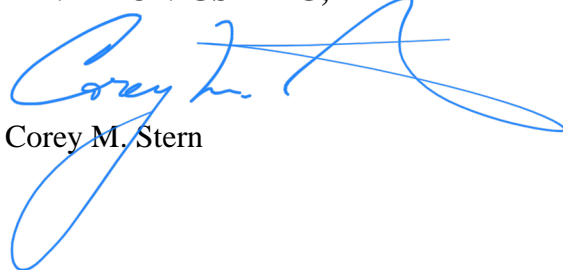
I have already sent a communication to Mr. Miles and Mr. Cleary, asking them to preserve documents, and I am requesting that you inform whomever your contact is for your client – the Detroit News – to do the same.

Please acknowledge receipt of this communication.

Thank you in advance for your anticipated cooperation.

Very Truly Yours,

LEVY KONIGSBERG, LLP

A handwritten signature in blue ink, appearing to read "Corey M. Stern", with a large, stylized flourish extending to the right.

Corey M. Stern