

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

**ADREA HILL and
LUKE SANNER,**

Case No: 24-8010-CZ

Plaintiffs,

Hon. Margaret Z. Bakker
Sitting by SCAO Assignment

v.

**OTTAWA COUNTY and
OTTAWA COUNTY BOARD
OF COMMISSIONERS,**

Defendants.

AFFIDAVIT OF ADREA HILL

Adrea Hill states:

1. I am the plaintiff in the above-captioned matter.
2. On February 3, 2025, the date of oral argument in this matter, or shortly thereafter, I learned that the trial judge in this case previously had her own emails turned over as a result of a FOIA request.
3. I also learned that the trial judge's emails that were made public due to a FOIA request garnered attention from the media and were at issue in a political campaign.
4. I also learned that the Michigan Supreme Court rebuked the trial judge because of the judge's emails that were made public due to a FOIA request.

5. I was present for the oral argument on February 3, 2025, and felt that some of the judge's assessments of the facts of my case seemed far off base. For example, the trial judge described my FOIA request as "breathhtaking in scope" more than once. However, my FOIA request asked only for communications of one public official during one public meeting for a four-hour period. To me, that seemed like a very focused request, not one that was unduly onerous or "breathhtaking in scope." It seemed like an odd way to describe my FOIA request.
6. After the hearing, when I learned that the trial judge had been publicly embarrassed by communications of hers becoming public through a FOIA request, her opposition to enforcing FOIA in my case and her concerns about the privacy rights of public officials despite the plain language of the statute, in the way that she expressed it, made much more sense to me. I no longer feel as though the trial court judge can be fair and impartial in deciding my case.
6. I believe that an ordinary person could reasonably question the impartiality of the trial judge to decide the issues in this case.

I declare under penalty of perjury that this statement is true to the best of my knowledge, information, and belief.

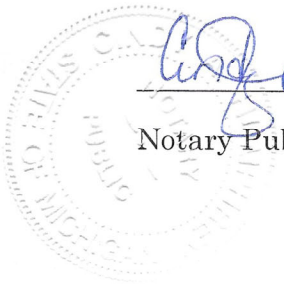
Dated: February 17, 2025

Adrea Hill

Adrea Hill

Sworn and Subscribed to Before

Me on this 17th day of February, 2025



Cindy A. Humphrey

Notary Public

CINDY A. HUMPHREY
Notary Public, State of Michigan
County of Ottawa
My Commission Expires Oct. 11, 2025
Acting in the County of Ottawa