

Kevin T. Kennedy  
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October 19, 2023

Phillip Lovati  
2108 Erban Street  
St. Clair Shores MI 48081  
[Philllovati@gmail.com](mailto:Philllovati@gmail.com)

Paul Doppke  
Landscape Services  
22932 Rasch Drive  
Clinton Township MI 48035

**B L A K E  
K I R C H N E R  
S Y M O N D S  
L A R S O N  
K E N N E D Y  
S M I T H**

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PROFESSIONAL CORPORATION  
ATTORNEYS AND COUNSELORS AT LAW

**Bruce F. MacFarlane**  
(1953 - 2003)

Gentlemen:

As you will recall from my August 1, 2022 correspondence (attached as Exhibit A), I am the attorney for Premier Group Associates (PGA).

Attached for your review and records, is a copy of the cease and desist letter that we previously forwarded to both of you in regards to Mr. Lovati's interference with our existing customers.

It has now come to our attention that Mr. Lovait continues to defy the terms of his agreed upon severance from PGA. Attached as Exhibit B is a copy of the Great Lakes Water Authority (GLWA) Procurement Form "Notice of Intent to Award" with respect to the maintenance services for GLWA. I have also copied GLWA's Carla Smith and Debra Poseich (legal) on this correspondence.

As you are both aware, my client, PGA, is a long-time vendor for GLWA and, in fact, we had the previous grounds maintenance service contract for this client. Contrary to Mr. Lovati's Separation Agreement, he continues to participate in soliciting our former clients and tortiously interfering with our contractual relationships.

Please consider this letter a cease and desist from disclosing any additional confidential material. As all parties should be aware, at the time that Mr. Lovati left PGA's employ, he was in possession of certain contractor customer lists, customer information, and other confidential materials. To the extent that these confidential materials have been disclosed to Mr. Doppke and Landscape Services in their efforts to procure the contract from GLWA, this conduct is contrary to Michigan Law. Please be advised that we will pursue our remedies to the fullest extent of the law.

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5851 South US 27  
Building 10, Ste. 12  
Lansing MI 48906

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Finally, attached as Exhibit C is our August 11, 2023 explanation/support for the GLWA Request For Proposal (RFP). Carla and Debra Poseich will note that my client is a Detroit based, "WBE" vendor. Unlike Landscape Services we have historically employed upwards of 40 "Detroiters" to service the GLWA account. Absent a reconsideration of the RFP or a rebid, these "Detroiters" will likely lose their jobs.

If anyone has questions or requires any further information, please contact me.

Very truly yours,

Kevin T. Kennedy

KTK/jg

Enclosures

cc: Carla Smith & Debra Poseich – GLWA 735 Randolph, Detroit MI 48226