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

Paul H. Deering,
Plaintiff,

v.

Laura P. Deering,
Defendant.

RECEIVED FOR FILING
OAKLAND COUNTY CLERK

Case
HON.

92-435044-DM



JUDGE JOHN J. McDONALD
DEERING, PAUL. V. DEERING, LAUR

'95 APR 28 P3:10

Paul H. Deering, In Pro Per
62 Village Circle
Apartment 6
Rochester Hills, MI 48307
(810) 299-5887

Kenneth Bisdorf
Attorney for Plaintiff
400 West Maple Road
Suite 300
Birmingham, Michigan 48009
(810) 647-7514

Laura P. Deering, In Pro Per
3367 Ellenboro
Troy, Michigan 48083
(810) 528-9338

STATE OF MICHIGAN
COUNTY OF OAKLAND } ss.

RUTH JOHNSON, County Clerk for the County
Oakland, Clerk of the Circuit Court thereof, the
being a Court of Record and having a Seal, her
certify that the attached is a true copy.

In Testimony whereof, I have hereunto set my
placed the Seal of said Court this _____

RUTH JOHNSON, Clerk Register of Dee
Depu

ANSWER TO MOTION FOR ENTRY OF ORDER IN CONFORMANCE WITH
FRIEND OF THE COURT RECOMMENDATION

ANSWER TO FRIEND OF THE COURT

MOTION FOR JUDICIAL HEARING

Plaintiff states in ANSWER TO MOTION FOR ENTRY OF ORDER IN
CONFORMANCE WITH FRIEND OF THE COURT RECOMMENDATION and in answer
of the findings of the Friend of the Court:

1. Denied, as the ORDER dated February 24, 1994 was a
TEMPORARY ORDER PENDING THE INVESTIGATION OF THE FRIEND OF THE
COURT. Agreed, it was "without prejudice to either party."
2. Agreed.
3. Denied as untrue. Defendant failed to appear for the
initial hearing of March 29, 1994, the hearing was rescheduled to

May 13, 1994 and approximately two hours - not days - of testimony and evidence was taken before Referee David Bertucci.

4. Agreed.

5. Denied, as the Report is inaccurate and the recommendation is not in accordance with common law where the reduction of income was involuntary.

6. *Plaintiff has never stipulated to the finding of facts or Recommendation of the Friend of the Court be admitted as evidence.* The citations listed below indicate the inadmissibility of the F.O.C. Findings and Recommendation without Plaintiffs stipulation.

AFFIRMATIVE CITATIONS

Sweat v. Sweat - 329 Mich 251

Krachun v. Krachun - 355 Mich 167

McCarthy v. McCarthy - 74 Mich App 105

Plaintiff further states in rebuttal to the Recommendation by the Friend of the Court:

7. (FOC par. 5) Denied as untrue. All "sales" licenses were only intended as a temporary means of providing income as Laura completed her college first. She was to reciprocate as I completed my degree (Law) to which she refused. The Stock Brokers license expired approximately seven years ago in 1988, Real Estate Sales License expired shortly thereafter, and the Insurance License has had no active relationships since 1986 and to my knowledge expired January 1, 1995.

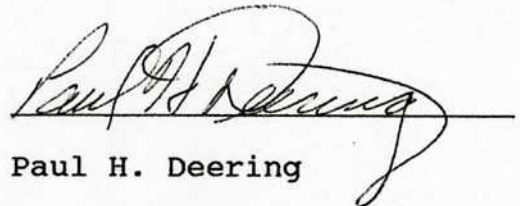
8. (FOC par. 7) Denied as untrue. Mr. Bertucci claims an adjusted gross income for 1991 of \$41,928.00. As stated plainly on the joint return that was our combined adjusted gross income.

15. Mr. Bertucci's position lacks legal argument as the premises he used to support his quest to impute income are false.

WHEREFORE, Plaintiff asks the court to deny the admission of the Findings and Recommendation of the Friend of the Court as evidence, and schedule a Judicial Hearing.

Dated:

April 28, 1995



Paul H. Deering

In Pro Per

Plaintiff

04402/00000 24:11

1991 W-2 and EARNINGS SUMMARY

Reference Copy

Statement 1991 OMB No. 15

Records.

Internal Revenue Service

urnished to the IRS and appropriate State officials

Dept.	Corp.	Employer use only
012	T	10

Name, address, and ZIP code

AGE CONNECTION INC
NORTHWESTERN
MINGTON HILLS MI 48018

Employer's ID number

38-2467147

Batch #170

Employer's state ID number

38-2467147

Employee's SSA number

375-62-8337

6 Stat Emp. Deceased Pension plan Legal rep. 942 emp. Deferred comp.

7 Allocated tips

8 Advance EIC payment

9 Federal income tax withheld

304.34

10 Wages, tips, other comp.

5943.97

11 Social Security tax withheld

368.53

12 Social Security wages

5943.97

13 Social Security tips

14 Medicare wages and tips

5943.97

15 Medicare tax withheld

86.19

16 Nonqualified plans

17 See instra. for Box 17

18 Other

19 Employee's name, address and ZIP code

PAUL H. DEERING
3367 ELLENBORO
TROY, MI 48083

22 Dependent care benefits

23 Benefits included in Box 10

24 State income tax

151.83

25 State wages, tips

5943.97

26 Name of state

MI W-2

27 Local income tax

28 Local wages, tips

29 Name of locality

This blue Earnings Summary is a copy of the original. The reverse side includes general information that you may find helpful.

1. The following information reflects your final 1991 paystub data.

Gross Pay	5943.97	Social Security Tax Withheld Box 11 of W-2	368.53	MI. State Income Tax Box 24 of W-2 SUI/SDI Box 18 of W-2
Fed. Income Tax Withheld Box 9 of W-2	304.34	Medicare Tax Withheld Box 15 of W-2	86.19	

2. Your Gross Pay Was Adjusted as follows to produce your W-2 Statement.

	Wages, Tips, other Compensation Box 10 of W-2	Social Security Wages Box 12 of W-2	Medicare Wages Box 14 of W-2	MI. State Wages, Tips, Etc. Box 25 of W
Gross Pay	5,943.97	5,943.97	5,943.97	5,943.97
Reported W-2 Wages	5,943.97	5,943.97	5,943.97	5,943.97

3. Employee W-4 Profile To change your Employee W-4 Profile information, file a new W-4 with your pr

PAUL H. DEERING
3367 ELLENBORO
TROY, MI 48083

Social Security Number: 375-62-8337
Marital Status: MARRIED

Exemptions/Allowances:

FEDERAL: 3
STATE: 3

1991 AUTOMATIC DATA PROCESSING, INC.

Fold and Detach Here

☐ CORRECTED (if checked)

PAYER'S name, street address, city, state, and ZIP code		1 Rents	OMB No. 1545-0115	Miscellaneous Income
W.B. Deering Co., Inc. 918 W. 14 Mile Rd. Clawson, Mich., 48017		\$	1991	
		\$		
PAYER'S Federal identification number		2 Royalties		
38-2906177	RECIPIENT'S identification number	\$	3 Prizes, awards, etc.	
375-62-8337		\$	4 Federal income tax withheld	5 Fishing boat proceeds
RECIPIENT'S name		\$	6 Medical and health care payments	7 Nonemployee compensation
Paul H. Deering		\$	8 Substitute payments in lieu of dividends or interest	\$ 5,917.65
Street address (including apt. no.)		\$	9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	Copy For Recipient This is important information being furnished to Internal Revenue Service. If you are required to file a return, a neglect of this report may impose on you if income is taxable to the IRS determine that it has not been reported.
City, state, and ZIP code		\$	10 Crop insurance proceeds	
Troy, Mich., 48083		\$	11 State income tax withheld	
Account number (optional)		\$	12 State/Payer's state number	

Form 1099-MISC

Department of the Treasury - Internal Revenue Service

☐ CORRECTED

checked)

street address, city, state, and ZIP code
Department of Michigan
Department of Labor
Michigan Employment Security Commission
310 Woodward
Detroit, Michigan 48202-3196

1 Unemployment compensation

OMB No. 1545-0120

\$ 6,072.00

2 State or local income tax
refunds, credits, or offsets

\$

Copy B
For RecipientCertain
Government
Payments

PAYER'S Federal identification number

RECIPIENT'S identification number

38-6000134 W

375-62-8337

3 Box 2 amount is for tax year

4 Federal income tax withheld

\$

CALENDAR YEAR

1991

This is important tax
information and is
being furnished to the
Internal Revenue
Service. If you are
required to file a
return, a negligence
penalty or other
sanction may be
imposed on you if this
income is taxable and
the IRS determines
that it has not been
reported.

RECIPIENT'S name

P. DEERING

3367 ELLENBORO

TROY MI 48063-5071

5 Discharge of indebtedness

6 Taxable grants

\$

\$

7 Agriculture payments

8 The amount in Box 2 applies
to income from a trade or
business ☐

\$

Account number (optional)

Form 1099-G

Department of the Treasury-Internal Revenue Service

EMPLOYEE W-2 WAGE SUMMARY 1991

0655

ASSOCIATES MANAGEMENT LTD.
330 HAMILTON ROW
BIRMINGHAM, MI

48009

Federal withholding exemptions M 1
MI withholding exemptions M 1

For 1991, you have no payroll adjustments which affected your federal
wages (Box 10) or state wages. Therefore, the wages on your final 1991
check statement should be the same as the wages reported on your W-2
statement.

PAUL H. DEERING

Form W-2 Wage and Tax Statement 1991

EMPLOYEE REFERENCE COPY

1 Control number	Dept. of the Treasury - Internal Revenue Service OMB No. 1545-0008	3 Employer's identification number 38-2833450	4 Employer's state I.D. number ME-0108407	5 Employee's social security number 375-62-8337
2 Employer's name, address, and ZIP code ASSOCIATES MANAGEMENT LTD. 330 HAMILTON ROW BIRMINGHAM, MI	0655 48009	19 Employee's name, address, and ZIP code PAUL H. DEERING 3367 ELLENBORO TROY, MI	0038-000200 48084	17 See Instrs. for Form W-2
6 Statutory employee	Deceased Pension plan Legal rep 942 emp Subtotal Deferred compensation Void	7 Allocated tips	8 Advanced EIC payment	18 Other
9 Federal income tax withheld	10 Wages, tips, other compensation 450.00	11 Social security tax withheld 27.84	12 Social security wages 450.00	22 Dependent care benefits
13 Social security tips	14 Medicare wages and tips 450.00	15 Medicare tax withheld 6.59	16 Nonqualified plans	23 Benefits included in Box 10
State/local income tax	State/local wages, tips, etc. 450.00	State/locality name MI	State/local income tax	State/local wages, tips, etc.
				State/locality name

This information is being furnished to the Internal Revenue Service