

**Court of Appeals, State of Michigan**

**ORDER**

People of the City of Westland v Jeffrey Kodlowski

Docket No. 301774

LC No. 10-001712-AR

Jane E. Markey  
Presiding Judge

Christopher M. Murray

Douglas B. Shapiro  
Judges

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On its own motion, the Court hereby orders the parties to submit supplemental briefs not to exceed 10 pages addressing the following issues:

- (1) whether defendant presented (and therefore preserved for appeal) a defense to the resisting arrest charge on the basis of the polices' allegedly unlawful conduct, and
- (2) the effect, if any, of *People v Moreno*, 491 Mich 38; \_\_\_ NW2d \_\_\_ (2012) to this case.

The parties shall file their briefs with the Clerk of this Court no later than 14 days from the date of entry of this order. No response briefs shall be permitted.



A true copy entered and certified by Larry S. Royster, Chief Clerk, on

June 4, 2012  
Date

  
Chief Clerk