

Exhibit 2

Affidavit of Michael Dunn

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

DOUGLAS MARSHALL,

Plaintiff,

v.

Case No. 14-cv-12872
Hon. Marianne O. Battani

CITY OF WARREN and JAMES R. FOUTS,
In his individual capacity and in his official capacity as
Mayor of Warren,

Defendant.

DANIEL S. KOROBKIN (P72842)
MICHAEL J. STEINBERG (P43085)
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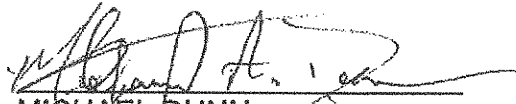
SHERYL LAUGHREN (P34697)
Attorney for Defendant James R. Fouts
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MICHAEL DUNN, being duly sworn, states as follows:

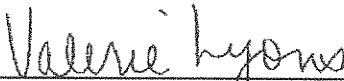
AFFIDAVIT OF MICHAEL DUNN

1. That I, Michael Dunn, am a resident of the City of Warren.
2. I am the director of the Prayer Station located in the atrium of the Warren City Hall.
3. The setup of the Prayer Station is simple and is small enough that I can carry it in one hand, even with my disability. It consists of a folding table and a few folding chairs.
4. The Prayer Station is denominationally neutral.
5. The Prayer Station is not intended to be a tool of evangelism. The purpose of the Prayer Station is only prayer.
6. Prayer Station volunteers are not allowed to engage in scriptural debate of any kind.
7. The Prayer Station is staffed by volunteers that serve in two person teams for accountability and safety.
8. I distribute Guidelines for Prayer Station Operation to each volunteer who will work the Prayer Station. All volunteers are expected to abide by those rules.
9. A copy of the Guidelines for Prayer Station Operation are taped to the outside of a folder that is always present on the Prayer Station table.
10. To the best of my knowledge, no staff members have violated any rules or regulations pertaining to the use of the atrium.
11. If any of the Prayer Station rules were broken it was inadvertent and not authorized.
12. Volunteers at the Prayer Station only speak with individuals who approach the table. Volunteers are not permitted to approach people who are just passing by.

13. When an individual approaches the Prayer Station, volunteers give a simple greeting followed by the question "Would you like prayer today?" In the event that someone approaches the table and does not want prayer, volunteers ask if the person has a physical need such as food or clothing. Volunteers either write down the person's first name and their prayer request or direct them to places that can help them with their physical needs.
14. Volunteers at the Prayer Station do not solicit donations and when money is offered to a volunteer they do not accept it.
15. Volunteers do not hand out information about any place of worship unless specifically asked for it.
16. Several of my volunteers have reported to me that they feel threatened by Mr. Marshall. In addition, it has been reported that Mr. Marshall specifically waits until female workers are alone at the table before approaching.


MICHAEL DUNN
25155 Nuway Avenue
Warren, MI 48091

Subscribed and sworn to before me this
14th day of August, 2014


Valerie Lyons, Notary Public
Macomb County, Michigan
Acting in the County of Macomb
My Commission Expires: 9/16/17

VALERIE LYONS
Notary Public, State of Michigan
County of Macomb
My Commission Expires 09-16-2017
Acting in the County of Macomb