

Exhibit 4

Affidavit of Brenda Hutchinson

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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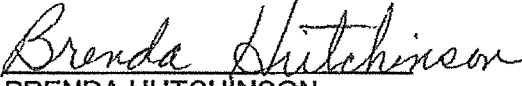
SHERYL LAUGHREN (P34697)
Attorney for Defendant James R. Fouts
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BRENDA HUTCHINSON, being duly sworn, states as follows:

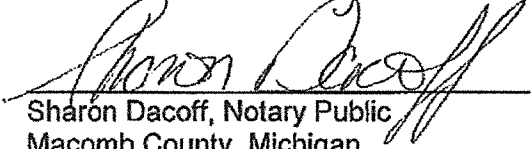
AFFIDAVIT OF BRENDA HUTCHINSON

1. That I, Brenda Hutchinson, am a resident of the City of Warren.

2. I have worked at the Prayer Station, located in the atrium of the Warren City Hall, for more than three years.
3. My shift at the Prayer Station is Thursdays, from 9am until 12pm.
4. I only speak with individuals who approach the table. I do not approach people that are only passing by.
5. If someone approaches the table and makes a request, I write down the person's prayer request and their first name.
6. I do not solicit donations and I do not hand out information about any place of worship unless I am specifically asked.
7. During one of my shifts in 2014 I was approached by Douglas Marshall.
8. When Mr. Marshall approached the Prayer Station he slammed something down on the table and asked me what right I had to be here.
9. I told him that we had permission to be here and he became agitated with me.
10. Mr. Marshall then told me that what I was doing was against the Constitution and that I had offended him.
11. When I asked what I had done that was offensive he got angry and threatened to have the Prayer Station thrown out.
12. When Max, the City of Warren maintenance man, saw how angry Mr. Marshall was getting he approached and told Mr. Marshall that he had asked him to leave several times in the past and was being asked to leave now.
13. Throughout the entire confrontation I felt threatened and I continue to worry that Mr. Marshall might come back again.


BRENDA HUTCHINSON
32533 Ridgefield Avenue
Warren, MI 48088

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


Sharon Dacoff, Notary Public
Macomb County, Michigan
Acting in the County of Macomb
My Commission Expires: 4/25/18

SHARON DACOFF
Notary Public, State of Michigan, County of Macomb
My Commission Expires April 25, 2018
Acting in the County of Macomb