

STATE OF MICHIGAN
IN THE 7TH JUDICIAL CIRCUIT COURT FOR THE COUNTY OF GENESEE

JASON BALLANTYNE,
Plaintiff (In Pro Per),
v.
GENESEE COUNTY ROAD COMMISSION;
WADE TRIM; and NASHVILLE CONSTRUCTION,
Defendants.

Case No. 2026-63926-CZ · Hon. Elizabeth A. Kelly

PLAINTIFF'S EXHIBIT LIST — PRELIMINARY INJUNCTION HEARING (JULY 27, 2026)

Ex.	Description	Source file
1	Water-flow map — the 'horseshoe' discharge path across four private parcels	03-Evidence\Maps-and-graphics\Water-flow map
2	Video: 'Seymour Road Water Damage' (flooding in motion)	vimeo.com/1201855236 (+ 720p file)
3	Mar 31, 2023 — drain discharging concentrated flow onto property (pre-project)	A1 / 20230331_111729.jpg
4	Nov 2024 — eroded channel cut along driveway (pre-project)	A2 / 20231124_164233.jpg
5	Apr 2025 — stormwater sheeting across yard and driveway	B1 / 20250402_151333.jpg
6	Jul 2024 — video stills: yard under sheet flow	B3–B4 / video stills
7	Doubled outflow culverts under driveway at pond (owner-funded mitigation)	C1–C2 / 20240805_175132, 175103
8	Rock channel built by owner; running full	C3–C4 / 20240806_101052, 20250506_102525
9	New cross-road culvert discharging east onto private land (2026)	D1–D2 / 20260615_085425, 085526
10	West side: removed driveway culvert at 10-10-400-023; unrestored ditch (2026)	E3–E4 / 20260615_085935, 085938
11	Street View (May 2025): west ditch/approach BEFORE removal	E1–E2 / StreetView-westside
12	Mary's sump outlet (6463 Seymour) in the discharge path	F1 / 20260615_095827.jpg
13	FEMA NFHL: parcels in Zone X, FIRM panel 26049C0290D	FEMA MSC printout (print before

		hearing)
14	Community Support Signature Packet (13+ households, Hill Rd–Reid Rd)	01-Court-Filings (filed)
15	Cascading-cost diagram (annual damage summary)	03-Evidence\Maps-and-graphics\Cascading cost
16	Costs: driveway restoration, culvert doubling, tree removal (plans printed too faint) — receipts and/or sworn statement of cash payments	Jason to assemble / affidavit
17	Plaintiff's driveway culvert crushed during construction, still unrepaired — interior collapsed to a fraction of its diameter; only a sliver of light passes through	H1–H4 / Photos-labeled (July 2026)
18	Project near completion: hydroseeded new ditch along final asphalt	G1 / Photos-labeled (July 2026)
19	Plaintiff's trees standing in the ditch line (obstructed drainage path; cleared at Plaintiff's own expense after tree contractor missed them on too-faint plans)	I1 / Photos-labeled
20	Nashville Construction change orders proposing corrective drainage work (restore west ditch; reinstall culvert; ditch east side) and the Road Commission's denials	Defendants' documents — request production / subpoena
21	ADS (pipe manufacturer) letter, M. Vargas P.E., 7/23/26: culverts installed with less than minimum cover; warranty void — 'this pipe will fail'	01-Court-Filings\ADS Cover Requirements Letter
22	GCRC's OWN published brochure: 'Provide sufficient cover over culvert... maintain the existing water flow'; 'Do not fill any ditches!'	J1–J2 / Photos-labeled (from gcr.org)
23	MDOT 2020 Standard Specifications for Construction — excerpts (pp. 30, 55–59, 772–778, 794: culvert installation & cover)	upload\Rick-evidence (print pages)
24	Owner-annotated aerial: water path off BOTH sides of the road, rejoining at north end	Maps-and-graphics\Aerial exhibit v2

Note: assemble one physical binder in this order with tabbed dividers; bring three copies. Print the FEMA map page and Street View captures in color.