



## Michigan Supreme Court

State Court Administrative Office

**Field Services Division**

Michigan Hall of Justice

P.O. Box 30048

Lansing, Michigan 48909

Phone (517) 373-4835

Ryan P. Gamby  
Field Services Director

## SCAO Monthly Update August 2025

**D** District/Municipal Court

**C** Circuit Court

**P** Probate Court

- \* It is recommended that all information be reviewed, with symbols highlighting key items that may be of particular interest to this court.

### **Resources and Information**

1. [NCSC: Trends in State Courts 2025](#) - This edition highlights how courts are meeting public demand for innovation, with articles on artificial intelligence, guardianship monitoring, and tools to streamline legal document preparation. It features 11 practical solutions for improving court access and operations.
2. [Funding Opportunity: Access and Visitation Services](#) - Each year, the Administration for Children and Families (ACF) provides funding to states to administer the Access and Visitation (AV) Program, which supports children in maintaining relationships with their noncustodial parents. In Michigan, the State Court Administrative Office (SCAO) awards AV service contracts to Friend of the Court (FOC) offices to provide supervised visitation and/or neutral exchange (pick-up and drop-off) services. Deadline: FOCs interested in applying for FY 2026 AV Grant Program funding must submit a completed application by 5:00 p.m. EDT on Friday, August 15. Questions may be directed to Michelle Hilliker at (517) 373-4844 or [HillikerM@courts.mi.gov](mailto:HillikerM@courts.mi.gov). All FOCs are encouraged to apply.
3. [SCAO Memo: Changes to Model LAO 35 - Requests for Accommodations by Persons with Disabilities](#) - Michigan Supreme Court Administrative Order (AO) 2015-5 directs each trial court to adopt a local administrative order (LAO) that describes the procedure to be followed for a person to request accommodations under the Americans with Disabilities Act (ADA) in that court. The LAO shall include the provisions incorporated in Model LAO 35 and courts shall comply with any additional requirements established by the State Court Administrative Office (SCAO) regarding compliance with the ADA.
4. [New Round of Courts Begin MiFILE Implementation](#) - MSC Chief Justice Megan Cavanagh and Justice Elizabeth Welch, the liaison on court technology, each recently welcomed new groups of





courts that are working to implement MiFILE, SCAO's e-filing program. Starting in July and “going live” in November, this will be the 7th round of implementations for courts to utilize the standard solution of MiFILE for district, probate, and now circuit courts. Click the link to learn more about MiFILE.

### Forms

1. The following items have been posted to the website:
  - a. An [Explanation of changes](#) to CC 454. **C**
  - b. An [Explanation of changes](#) to MC 274.
  - c. An [Explanation of changes](#) to PCM 214, 219, and 219a. **P**
  - d. An [Explanation of changes](#) to MC 70a.
  - e. An [Explanation of changes](#) to PCM 208. **P**
  - f. An [Explanation of changes](#) and revised Michigan Trial Court Records Management Standards.

### Education

1. [NHTSA Reclassification and Reducing Impaired Driving Recidivism Through Assessment and Application Webinar](#) - Michigan has recently been reclassified by National Highway Traffic Safety Administration (NHTSA) from a “low-range” state to a “mid-range” state with respect to impaired driving fatalities. This webinar will focus on the reason for, and implications of, this classification change. Additionally, this webinar will explore an impaired driving assessment recommended by NHTSA and judicial sentencing tools that can be employed with identified high risk defendants. This program is eligible for continuing judicial education (CJE) credit: [1.0 Judicial Practice & Related Areas]. Intended Audience: Judicial Officers.  
**Wednesday, August 13, 2025, 12:00 p.m. – 1:00 p.m. ET.**
2. [SCAO's Child Welfare & Juvenile Justice Services and the Governor's Task Force on Child Abuse & Neglect: Addressing Trauma and Loss and Supporting Early Relationships in Child Welfare Work with Infants and Young Children](#) - This free virtual training will explore strategies for promoting family preservation and addressing trauma when removal is necessary. Featured speakers include Dr. Kate Rosenblum and Faith Edison, of Zero to Thrive.  
**Thursday, August 14, 2025, at 11:30 a.m. – 1:00 p.m. **C****
3. [NCSC: Data-driven leadership](#) - As more state courts turn to data to drive improvements and inform decisions, strong communication between court leadership and data professionals has never been more important. Join us for a thought-provoking webinar featuring two state court administrators as we explore how courts can overcome common data challenges, foster collaboration, and unlock the full potential of data to serve justice more effectively.  
**Thursday, August 14, 2025, 3:00 p.m. – 4:00 p.m.**
4. [Michigan Judicial Institute: Court Support Staff Certification Training](#) - This voluntary program is designed for newer court and county clerk support staff. Core modules include: Purpose and Responsibilities of Courts, Customer Service, Statutes and Records, and Professionalism and Ethics. Participants who complete all modules will receive a Certificate of Completion.  
**Wednesday–Thursday, August 13–14, 2025, 9:30 a.m. – 3:15 p.m. each day.**

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5. [Michigan Judicial Institute: Friend of the Court Alternative Dispute Resolution Training](#) - MCR 3.224 provides that the State Court Administrative Office (SCAO) will establish training and qualification requirements for persons conducting each type of alternative dispute resolution activity. The Michigan Judicial Institute (MJII), in collaboration with the Friend of the Court Bureau, will provide a virtual 20-hour Friend of the Court (FOC) Alternative Dispute Resolution (ADR) training. This training meets SCAO's training requirements for FOC staff to conduct facilitative and information-gathering conferences and FOC domestic relations mediation.  
**Tuesday, August 19, 2025, 9:00 a.m. – 3:00 p.m.**  
**Wednesday, August 20, 2025, 9:00 a.m. – 3:00 p.m.**  
**Thursday, August 21, 2025, 9:00 a.m. – 3:00 p.m.**  
**Tuesday, August 26, 2025, 9:00 a.m. – 3:00 p.m.**  
**Wednesday, August 27, 2025, 9:00 a.m. – 3:00 p.m.** 
  6. [Michigan Judicial Institute and Child Welfare and Juvenile Justice Services: What Juvenile Division Jurists and Justice Professionals Need to Know about Cybercrime, Part 1: Introduction to Cybercrime and Online Juvenile Delinquency Matters](#) - We are pleased to present a two-part webinar series that will explore the issue of cybercrime in juvenile justice, titled *What Juvenile Division Jurists and Justice Professionals Need to Know About Cybercrime*, where our presenters will discuss criminal activity using computers and digital systems, how to identify cybercrime, and managing digital evidence.  
**Friday, August 22, 2025, 12:00 p.m. – 1:00 p.m.** 
  7. [SCAO's Michigan Judicial Institute and Friend of the Court Bureau: Custody and Parenting Time Enforcement Myths](#) - This session will review recent updates to the FOC Enforcement Guidelines (FOCB Memorandum 2025-02), outline enforcement remedies available under Michigan law, and share best practices for handling custody and parenting time violations. Presenters include Dr. Timothy Cole and Amy Lindholm, of the SCAO Friend of the Court Bureau.  
**Thursday, August 28, 2025, 9:00 a.m. – 10:00 a.m.** 
  8. [Michigan Judicial Institute: Juvenile Probation Officer/Caseworker Certification Examination - Michigan Supreme Court Administrative Order 1985-5](#) requires a juvenile [court] probation officer/caseworker to complete the Michigan Judicial Institute (MJII) certification training within one year of employment.  
**Wednesday, September 10, 2025, 9:00 a.m. – 12:00 p.m., 1:00 p.m. – 4:00 p.m.** 
  9. [Michigan Judicial Institute: Assisted Outpatient Treatment 101 Webinar](#) - This training will provide a brief history of the Mental Health Code and how Assisted Outpatient Treatment (AOT) was developed in Michigan. We will discuss how probate and non-probate judges alike play a role in AOT and provide examples of high performing AOT programs in our state. This webinar is eligible for 1.0 Continuing Judicial Education (CJE) Credit [Judicial Practice & Related Areas]. Intended Audience: Judicial Officers.  
**Wednesday, September 10, 2025, 12:00 p.m. – 1:00 p.m. ET.**
  10. [NCSC: Court Technology Conference \(CTC\) 2025](#) - Registration is now open for the largest court technology event in the world—bringing together court professionals, technologists, and industry

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leaders to explore innovative solutions for modern courts. This year's conference will be held September 16-18, 2025, in Kansas City, and will feature hands-on learning, expert panels, and the latest technology shaping the future of justice.

11. [SCAO's Child Welfare & Juvenile Justice Services and the Governor's Task Force on Child Abuse & Neglect: Beyond the Bruises: Identifying Child Abuse vs. Medical Mimics](#) - This virtual training, led by Dr. Dena Nazer, of Kids-TALK and Wayne State University, will use real case examples to examine how certain medical conditions can mimic signs of abuse. The session emphasizes the importance of accurate, thorough evaluations to prevent misdiagnosis.  
**Wednesday, September 17, 2025, 11:30 a.m. – 1:00 p.m. C P**
  
12. [Michigan Judicial Institute and Juvenile Justice Services: What Juvenile Division Jurists and Justice Professionals Need to Know About Cybercrime, Part 2: Digital Evidence and Legal Processing](#) - We are pleased to present a two-part webinar series that will explore the issue of cybercrime in juvenile justice, titled *What Juvenile Division Jurists and Justice Professionals Need to Know About Cybercrime*, where our presenters will discuss criminal activity using computers and digital systems, how to identify cybercrime, and managing digital evidence.  
**Friday, September 26, 2025, 12:00 p.m. – 1:00 p.m. C P**

### Opportunities

1. MSC Opportunities:
  - a. [Court Security Specialist](#)
  - b. [Payroll Management Assistant](#)
  
2. SCAO Opportunities:
  - a. [FOCB Part-Time Law Clerk and Customer Service Representative](#)

### Proposed: Court Rules & Administrative Orders

<b>MCR Cite:</b>	<b>MCR 6.201 – Discovery <span style="color: red;">C</span></b>
ADM File:	<a href="#">2021-29</a>
Comment Period Expires:	October 1, 2025
Staff Comment:	The proposed amendment of MCR 6.201 would require, before providing a police report or interrogation record to the defendant, redaction of personal identifying information and information otherwise protected under the rule.

### Adopted: Court Rules & Administrative Orders

<b>MCR Cite:</b>	<b>MCR 3.207 and 3.210 – Ex Parte, Temporary, and Protective Orders; Hearings and Trials <span style="color: red;">C</span></b>
ADM File:	<a href="#">2021-27</a>
Effective Date:	September 1, 2025
Staff Comment:	The amendment of MCR 3.207: (1) clarifies the pleading requirements


for requesting certain ex parte orders, (2) requires that an evidentiary hearing be scheduled anytime the court enters an order that may change a child's established custodial environment, and (3) clarifies the procedure following service of an ex parte order. The amendment of MCR 3.210 requires courts to hold an evidentiary hearing prior to entering an order changing a child's established custodial environment in contested cases.

**MCR Cite:** **MCR 7.206 – Extraordinary Writs, Original Actions, and Enforcement Actions**

ADM File: [2022-08](#)

Effective Date: September 1, 2025

Staff Comment: The amendment of MCR 7.206 establishes procedures for handling county reapportionment challenges.

**MCR Cite:** **MCR 3.993 and 6.249 – Appeals and Restoration of Appellate Rights** 

ADM File: [2022-34](#)

Effective Date: September 1, 2025

Staff Comment: The amendment of MCR 3.993 adds a new subrule (F) to provide for the restoration of appellate rights in juvenile cases, similar to that of criminal cases under MCR 6.428. In addition, the amendments of MCR 3.993 and MCR 6.428 require that a motion be filed within a reasonable time and establish a presumption of reasonableness. Furthermore, both amendments clarify that a motion for restoration of appellate rights is limited to grounds for relief not raised in a prior proceeding or appeal, as well as require parties to provide the Court of Appeals with a copy of the order restoring appellate rights when filing the appeal unless the Court of Appeals directs otherwise.

**MCJC Cite:** **MCJC Canon 3 – A Judge Should Perform the Duties of Office Impartially and Diligently**

ADM File: [2022-48](#)

Effective Date: September 1, 2025

Staff Comment: The amendment of MCJC 3 allows a judge to make reasonable efforts to facilitate the ability of all litigants to be fairly heard.

**MCR Cite:** **MCR 7.209 – Bond; Stay of Proceedings**

ADM File: [2023-33](#)

Effective Date: September 1, 2025

Staff Comment: The amendment of MCR 7.209 clarifies that the appellate courts can sua sponte order a stay of proceedings or stay the effect or enforcement of any trial court judgment or order.

**MCR Cite:** **MCR 2.003 – Disqualification of Judge** 

ADM File: [2024-03](#)

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Effective Date: September 1, 2025  
Staff Comment: The amendment of MCR 2.003 clarifies the assignment procedures when a business court judge has been disqualified from a case.

**AO Cite: Administrative Order No. 1985-5 – Juvenile Court Standards and Administrative Guidelines for the Care of Children C**

ADM File: [2024-38](#)

Effective Date: September 1, 2025

Staff Comment: The amendment of AO 1985-5 shortens the timeframe in which juvenile probation officers and casework staff must complete the Michigan Judicial Institute (MJI) certification training; establishes new employment criteria when hiring juvenile probation officers; and ensures that copies of various tools, guides, and results are incorporated into the case record. These amendments align with recommendations from the Juvenile Justice Task Force and recent legislation.

### Legislation

N/A

### Case Law

#### Civil Topics

[Mich Republican Party v Donahue](#), \_\_\_ Mich \_\_\_, \_\_\_ (2025) C

- Election Law – Standing to Enforce Partisan Parity Requirements for Appointing Election Inspectors

[Davis v BetMGM, LLC](#), \_\_\_ Mich \_\_\_, \_\_\_ (2025) C

- Lawful Internet Gaming Act (LIGA) and Michigan Gaming Control Board (MGCB) – Abrogation

[Yono v Ingham Co](#), \_\_\_ Mich \_\_\_, \_\_\_ (2025) C

- Takings Clause – Foreclosure Sale and Lack of Surplus Proceeds Following Public Auction

[Jackson v Southfield Neighborhood Revitalization Initiative](#), \_\_\_ Mich \_\_\_, \_\_\_ (2025) C

- Takings Clause – Foreclosure Sale and Surplus Value Following Governmental Transfer

[Demott v VHS Harper-Hutzel Hosp, Inc](#), \_\_\_ Mich App \_\_\_, \_\_\_ (2025) C

- Wrongful Death Act (WDC) – Lost-Earning-Capacity Damages and Loss-of-Service Damages

[Saugatuck Dunes Coastal Alliance v Dep't of Environment, Great Lakes, and Energy](#), \_\_\_ Mich App \_\_\_, \_\_\_ (2025) C

- Circuit Court Appeal – Administrative Law Judge (ALJ) Subject-Matter Jurisdiction and Natural Resources and Environmental Protection Act (NREPA)

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[Core Values Constr, LLC v Sheehan's on the Green, Inc,](#) \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **C**

- Construction Lien
  - Foreclosure
  - Breach of Contract
  - Unjust Enrichment

[Markel v William Beaumont Hosp,](#) \_\_\_ Mich \_\_\_, \_\_\_ (2025) **C**

- Medical Malpractice – Agency

[Bonter v Progressive Marathon Ins Co,](#) \_\_\_ Mich \_\_\_, \_\_\_ (2025) **DC**

- No-Fault Insurance – Applicability of Increased Minimum Liability Limits

[C-Spine Orthopedics, PLLC v Progressive Mich Ins Co,](#) \_\_\_ Mich \_\_\_, \_\_\_ (2025) **DC**

- No-Fault Insurance – Assignment, Real Party in Interest, and One-Year-Back Rule

[Mays v Neeley,](#) \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **C**

- Open Meetings Act (OMA) – Public Body

[Mich Electric Transmission Co, LLC v Mich Pub Power Agency,](#) \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **C**

- Transmission Infrastructure Planning Act – Line Interconnection

### **Criminal Topics**

[People v Jones,](#) \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **DC**

- Evidence – Other Acts
- Evidence – Statements Made for Purposes of Medical Treatment
- Felony Murder – First-Degree Murder and First-Degree Child Abuse

[People v Masi,](#) \_\_\_ Mich \_\_\_, \_\_\_ (2025) **DC**

- Evidence – Rape-Shield Statute and Prior Conviction

[People v Moore,](#) \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **DC**

- Felony Sentencing – Attorney Fees

[People v Winburn,](#) \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **C**

- Felony Sentencing – Subject-Matter Jurisdiction
- Successive Motion for Relief From Judgment – Double Jeopardy

[People v Owens,](#) \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **DC**

- Plea – Withdrawal After Acceptance But Before Sentence

[People v Tadgerson,](#) \_\_\_ Mich \_\_\_, \_\_\_ (2025) **DC**

- Prisoner in Possession of a Controlled Substance (PPCS) – Not a Strict-Liability Offense

[People v Kvasnicka](#) (On Remand), \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **C**

- Terrorist Threat – Facial Constitutionality

[People v Wade](#), \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **D C**

- Evidence – Other Acts of Domestic Violence
- Evidence – Polygraph Examination
- Felony-Firearm – Statute of Limitations
- Felony Sentencing – Jail Credit
- Fifth Amendment – Prison Interview
- Sixth Amendment – Prison Interview

[People v Morris](#), \_\_\_ Mich \_\_\_, \_\_\_ (2025) **C**

- Felony Sentencing – Offense Variable (OV) 19

### **Family Topics**

[In re DRRR Guardianship](#), \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **C P**

- Special Immigrant Juvenile (SIJ) Status – State Court Predicate Factual Findings
- Foreign Language Interpreter - Appointment

[In re Boshell/Shelton](#), \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **C**

- Termination of Parental Rights
  - Jurisdiction
  - Reunification Efforts
  - Failure to Prevent Injury or Abuse
  - Best Interests

### **Probate Topics**

[In re CY Guardianship](#), \_\_\_ Mich App \_\_\_, \_\_\_ (2025) **P**

- Estates and Protected Individuals Code (EPIC)
  - Guardian Appointment
  - Patient Advocate Designation (PAD)