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 7 Regan Media, Inc. and Judith Regan

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 JENNA MASSOLI p/k/a JENNA )  
 11 JAMESON, )  
 )  
 12 Plaintiff, )  
 )  
 13 vs. )  
 14 "REGAN MEDIA," and JUDITH )  
 REGAN, an individual, )  
 15 Defendants. )

No. CV 05-0854 PHX EHC

**DEFENDANT/  
 COUNTERCLAIMANT REGAN  
 MEDIA'S MOTION TO  
 COMPEL**

16 \_\_\_\_\_ )  
 17 REGAN MEDIA, INC., a New York )  
 corporation, and JUDITH REGAN, an )  
 18 individual, )  
 19 Defendants/Counterclaimants, )  
 )  
 20 vs. )  
 21 JENNA MASSOLI p/k/a JENNA )  
 JAMESON, an individual, )  
 22 Plaintiff/Counterdefendant, )  
 23 and )  
 24 JAY GRDINA, an individual, )  
 25 Third-Party Counterdefendant. )  
 26 \_\_\_\_\_ )

(Assigned to the Honorable  
 Earl H. Carroll)

1 Pursuant to Fed. R. Civ. P. 37, Defendant/Counterclaimant Regan Media,  
2 Inc. ("Regan") respectfully requests that the Court issue an order (1) compelling Plaintiff/  
3 Counterdefendant Jenna Massoli p/k/a Jenna Jameson and Counterdefendants Jay Grdina  
4 and Dolce Amore, Inc. (collectively, "Counterdefendants") to respond to Regan's First  
5 Request for Production of Documents, and (2) awarding Regan its reasonable expenses  
6 and attorneys' fees incurred in bringing this Motion.  
7

8 On November 4, 2005, Regan's First Request for Production of Documents  
9 was served on Counterdefendants, and Counterdefendants still have not produced a written  
10 response or the requested documents. In accordance with Fed.R.Civ.P. 37(a)(2) and Local  
11 Rule 7.2(j), undersigned counsel has attempted in good faith to resolve this matter without  
12 involving the Court, and the requisite Statement of Moving Counsel attesting to those  
13 efforts is attached.  
14

15 This Motion is supported by an accompanying Memorandum in Support of  
16 Defendant/Counterclaimant Regan Media's Motion to Compel.  
17

18 Respectfully submitted this \_\_\_\_ day of January, 2006.  
19

20 STEPTOE & JOHNSON LLP

21 By: /s/ David J. Bodney \_\_\_\_\_

22 David J. Bodney  
23 Dennis K. Blackhurst  
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Attorneys for Defendants/  
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Judith Regan

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CERTIFICATE OF SERVICE

I hereby certify that on the 5<sup>th</sup> day of January, 2006, I caused the attached document to be electronically transmitted to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electric Filing to the following CM/ECF Registrants:

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I hereby certify that on the 5<sup>th</sup> day of January, 2006, I served the attached document by mail on the following, who are not registered participants of the CM/ECF System:

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/s/ Beth Gibson  
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