

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STEINBUCH)	
)	
Plaintiff,)	
)	No. 01:05-CV-00970 (PLF) (JMF)
v.)	
CUTLER)	
)	
Defendant.)	
)	

MOTION TO COMPEL

Plaintiff moves to compel Defendant to respond to outstanding discovery. Plaintiff served two sets of discovery on Defendant for which responses are already due. Defendant replied with virtually no responses (see attached). The sought discovery is relevant to Plaintiff's case and/or reasonably calculated to lead to same. In order to resolve amicably the issues, Counsel for Plaintiff spoke with Defendant's Counsel who said that he would not respond further. Defendant refuses to provide any discovery regarding persons other than Defendant and any information from after May 18, 2004. This information is discoverable and is being improperly withheld. In addition, Defendant states in his discovery responses that he would provide documents, but later stated that he would only produce one document.

Dated: September 22, 2006

Respectfully Submitted,

/Jonathan Rosen/
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