

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

Case No. 07-21403-CIV-COHN/SELTZER

ANTONIO HERNANDEZ,
Individually and on behalf of all
others similarly situated,

Plaintiff,

v.

IGE U.S. LLC,
a Delaware corporation,

Defendant.

**PLAINTIFF ANTONIO HERNANDEZ'S MOTION TO COMPEL
ANSWERS TO PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS
AND INTERROGATORIES, AND FOR EXTENSION OF DISCOVERY LIMITS**

Plaintiff Antonio Hernandez hereby moves, by and through his undersigned counsel, for an Order of this Court compelling Defendant IGE U.S. to respond fully to his outstanding discovery requests. In support hereof, plaintiff relies upon his Memorandum in Support and the Declaration of Donald E. Haviland, Jr., Esquire, filed contemporaneously herewith.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1.A.3

Pursuant to Local Rule 7.1.A.3, undersigned counsel for plaintiff certifies that he has contacted IGE U.S.' counsel to confer in a good faith effort to resolve the issues raised by this Motion, and that the parties were unable to resolve this discovery dispute, the subject matter of which is detailed in the letter dated June 8, 2008 attached as Exhibit "G" to the Declaration of Donald E. Haviland, Jr., Esquire.

Dated: July 3, 2008

Respectfully submitted,

/s/ Donald E. Haviland, Jr., Esquire
Donald E. Haviland, Jr., Esquire
Michael J. Lorusso, Esquire
THE HAVILAND LAW FIRM, LLC
740 S. Third Street, Third Floor
Philadelphia, PA 19147
Telephone: (215) 609-4661
Facsimile: (215) 392-4400
haviland@havilandlaw.com

C. Richard Newsome, Esquire
Florida Bar No.: 827258
Andrew F. Knopf, Esquire
Florida Bar No:
NEWSOME LAW FIRM
20 N. Orange Ave., Suite 800
Orlando, Florida 32801
Telephone: (407) 648-5977
Facsimile: (407) 648-5282
newsome@newsomelaw.com

CO-LEAD COUNSEL FOR THE PLAINTIFF,
ANTONIO HERNANDEZ, AND THE CLASS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed on this 3rd day of July, 2008, with the Clerk of Court using the CM/ECF system which will send notice of the electronic filing to:

James M. Miller, Esquire
Samuel S. Heywood, Esquire
Akerman Senterfitt
One S.E. 3rd Avenue, 25th Floor
Miami, FL 33131

Dated: July 3, 2008

/s/ Donald E. Haviland, Jr., Esquire
Donald E. Haviland, Jr., Esquire