

ORIGINAL**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AUG 30 2007

JAMES N. HATTEN, CLERK
 Deputy Clerk**DONALD JONES,
Plaintiff**

v.

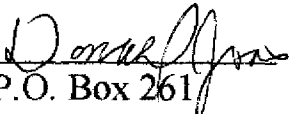
Case No: 1:07-CV-0567-CC-RGV**WACKENHUT & GOOGLE INC.,
Defendant****PLAINTIFF MOTION TO ASK THE COURT TO
INTERVENE IN THE DISCOVERY**

The plaintiff is asking the court to intervene in the discovery. The defendant is engaged in a "witch hunt" the plaintiff work as a public safety officer and was finger print once a year by the GBI as a employee at wackenhut. The plaintiff is also a notary public. The defendant in interrogatory no.12 want to know if the plaintiff had a criminal history If a person pay his debt he don't lose his credibility about three out of five people had records. In my employment my wages was garnishee by gwinnett county courts. The plaintiff file chapter 7 to stop the garnishee Wackenhut has all the records. This is a retaliation law sue an the defendant is harassing the plaintiff. The plaintiff is asking the court for a order of protective for the persons who will come forward. He fear the defendant is going to retaliation by hassing the witness. The defendant is deny the plaintiff his interrogatories on the grounds " that they are overly broad, unduly burdensome and seek information which is not relevant and not reasonably calculated to lead to the discovery of admissible evidence". If the defendant want to dismiss the case provide the court with the requested information an settlement.

Memorandum of law

The defendant is saying Rule 34, 37(a)(2)(B) and local Rule 37.1 give him the right to harass the plaintiff. The plaintiff is saying Rule 37(C)(D) give the plaintiff good reason not to admit.

Respectfully submitted this 31 th day of August 2007


P.O. Box 261
Red Oak, GA 30272
(678) 360-1505

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DONALD JONES

Plaintiff

Case No: 1:07-CV-0567-CC-RGV

v.

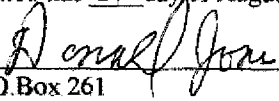
**WACKENHUT % GOOGLE INC.,
Defendant**

CERTIFICATE OF SERVICE

This to certify that I have this day served defendant with a copy of the foregoing notice by depositing a copy of same in the United States mail with adequate postage thereon to:

**DUANE MORRIS LLP
1180 West Peachtree Street
Suite 700
Atlanta, Georgia 30309**

Dated this 31 day of August 2007.



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Red Oak, GEORGIA 30272
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