

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

DONALD JONES,)	
)	
Plaintiff,)	
)	
v.)	Case No: 1:07-CV-0567-CC-RGV
)	
WACKENHUT % GOOGLE INC.,)	
)	
Defendant.)	

DEFENDANT THE WACKENHUT CORPORATION'S
MOTION TO COMPEL

COMES NOW Defendant The Wackenhut Corporation (incorrectly identified in Plaintiff's Complaint as "Wackenhut % Google Inc.") (hereinafter "Defendant"), pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37.1, and hereby moves this Court for an Order: (a) compelling Plaintiff to supplement his responses to Defendant's First Set of Interrogatories and First Request for Production of Documents; and (b) awarding Defendant its expenses and attorneys' fees reasonably incurred in the preparation of this Motion.

In accordance with Federal Rule of Civil Procedure 37(a)(2)(B), counsel for Defendant has in good faith conferred with Plaintiff, who is proceeding *pro se*, to secure the requested information without the Court's assistance. However, as

discussed in more detail in the accompanying Memorandum of Law in Support of this Motion, Plaintiff has failed to comply with Defendant's requests.

WHEREFORE, for these reasons, Defendant respectfully requests that the Court issue an Order granting its Motion to Compel.

Respectfully submitted this 17th day of September, 2007.

DUANE MORRIS LLP

/s/ James P. Ferguson, Jr.
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The Wackenhut Corporation

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel hereby certifies that this filing complies with the type-volume limitations set forth in Rule 5.1 of the Local Rules of the United States District Court for the Northern District of Georgia. Counsel hereby states that this filing has been typed in Times New Roman 14 font.

/s/ James P. Ferguson, Jr.
James P. Ferguson, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2007, I electronically filed the foregoing **DEFENDANT THE WACKENHUT CORPORATION'S MOTION TO COMPEL** with the Clerk of Court using the CM/ECF system.

I further certify that on this 17th day of September, 2007, I have mailed by United States Postal Service the document to the following non-CM/ECF participant:

Donald Jones
P.O. Box 261
Red Oak, Georgia 30272

/s/ James P. Ferguson, Jr.
James P. Ferguson, Jr.

Attorney for Defendant
The Wackenhut Corporation