

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Docket No.: 06 CA 11370 MLW

FILED
IN CLERKS OFFICE

2007 JUL 30 A 10 08

U.S. DISTRICT COURT
DISTRICT OF MASS.

Christine. Varad,
Plaintiff,
v.

Reed Elsevier Incorporated,
d.b.a. *LexisNexis, LexisNexis Risk &
Information Analytics Group, Inc.*,
Defendant.

**PLAINTIFF'S LR D. Mass. 37.1 MOTION TO COMPEL DEFENDANT TO
RESPOND TO INTERROGATORIES PURSUANT TO Fed. R. Civ. P. 33 and 37(a).**

Plaintiff, Christine Varad, hereby motions this court to compel Reed Elsevier Incorporated, d.b.a. *LexisNexis, LexisNexis Risk & Information Analytics Group, Inc.* to make responses to interrogatories pursuant to Fed.R.Civ.P. 33 and 37(a). See: Attached Exhibit A.

PART I

LR 37.1 (2) Conference Not Held

A discovery conference has not been held between Plaintiff, Christine Varad and Kristin Cataldo, counsel for defendant, Reed Elsevier, Inc., d.b.a. LexisNexis, LexisNexis Risk & Information Analytics Group, Inc., and no agreements have been reached, Reed citing the close of the period designated for discovery.

PART II

LR 37.1 (3) Nature of Case and Facts Relevant to Discovery Matters to be Decided

A. Nature of the Case

B. Facts Relevant to Discovery Matters to be Decided

The facts that are materially relevant to the discovery matters to be addressed by this Court are as follows:

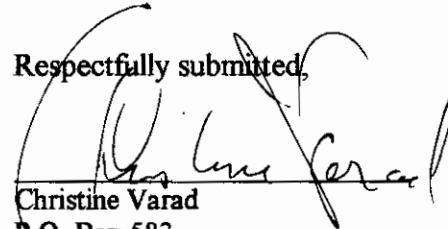
1. Reed was served with a copy of "Plaintiff Varad's First Set of Interrogatories Addressed to Defendant, Reed Elsevier, Inc., d.b.a., LexisNexis; LexisNexis Risk & Information Analytics Group, Inc. on July 1, 2007.
2. The period for discovery remained in force until July 13, 2007.
3. On June 21, 2007, the Court heard motions regarding Reed's failure to provide Varad with Fed. R. Civ. P. 34 documentary discovery. At the June 21, 2007 hearing the Court specifically suggested that Varad could serve Reed with interrogatories. Varad followed the suggestion and served Reed with interrogatories.
4. Reed submitted no response at all to Varad's interrogatory requests.
5. Reed improperly manipulated the discovery period allowed to ultimately provide no discovery at all.
6. Reed's failure to produce documentary discovery or respond to interrogatory requests prejudices the rights of other, non-party interests who seek to defend themselves against related acts of defamation. Reed has involved Rajan Varad by trying to falsely claim that he lived in South Dakota. Reed refuses produce documents or answer questions concerning his right to be free from computer generated defamation as to his name and his address history. See: Exhibit B.

CONCLUSION

For all of the foregoing reasons, this Court should compel defendant Reed Elsevier, Inc., LexisNexis, LexisNexis Risk and Information Analytics Group to respond to all of Varad's interrogatory requests.

July 30, 2007

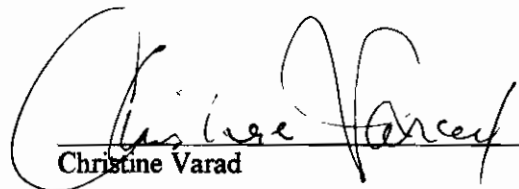
Respectfully submitted,



Christine Varad
P.O. Box 583
Milton, Massachusetts 02186
781 583 7117

I certify that on this 30th day of July 2007, I caused a copy of:
"PLAINTIFF'S LR D. Mass. 37.1 MOTION TO COMPEL DEFENDANT TO RESPOND TO INTERROGATORIES PURSUANT TO Fed. R. Civ. P. 33 and 37(a)," to be served on the attorney of record for defendant Reed Elsevier, Incorporated at the following address of record:

Kristin Cataldo
Donnelly, Conroy and Gelhaar, LLP
One Beacon Street, 33rd Floor
Boston, Massachusetts 02108
617 720 2880



Christine Varad