UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CCR INTERNATIONAL, INC., CCR Development Group, Inc., and José Fuertes, and Banco Cooperativo de Puerto Rico, Plaintiffs,

v.

Civil Action No.: 16-6280(PAE-NFK) Civil Action No.:17-6697 (PAE-NFK) Civil Action

No.:15-6563(PAE-NFK)

ELIAS GROUP, LLC,

Defendant.

MOTION TO COMPEL PRODUCTION

TO THE HONORABLE COURT:

COME NOW Plaintiffs, CCR International, Inc., CCR Development Group, Inc., and José Fuertes, through their undersigned counsel, and respectfully ALLEGE and PRAY as follows:

1. For the reasons set forth in the Memorandum of Law filed today, the appearing parties ask this Court to order Elias Group to produce the documents detailed therein because Elias Group cannot properly assert the client/accountant or work product privilege with respect to those documents.

WHEREFORE, in view of the foregoing, for the reasons in the Memorandum of Law filed today, the CCR Parties respectfully request this Court to order Elias Group to produce the documents identified in Exhibit 2 to the Memorandum of

Law, which Defendant has withheld based on privileges to which Defendant has no entitlement.

This 20th day of November 2019.

I HEREBY CERTIFY that I have filed this Motion with the Court's ecf system,

which system will notify all counsel of record.

Respectfully Submitted,

<u>/S/ JANE BECKER</u> JANE BECKER SDNY Number 6155 LAW OFFICES OF JANE BECKER P.O. Box 9023914 San Juan, Puerto Rico 00902-3914 Telephone: (787) 945-2406 Email: janebeckerwhitaker@gmail.com

11/20/19

The Court administratively denies, without prejudice, the motions pending at docket 210 and 211, for failure to comply with the Court's Individual Rule 2(C). The Court grants leave for the CCR Parties to re-file their motion to compel in compliance with the Court's Individual Rules.

SO ORDERED.

Paul A. Ergely

PAUL A. ENGELMAYER United States District Judge