

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

FILED

MARIA DEGENNARO,
Plaintiff,

2003 NOV -6 P 3:44
CIVIL ACTION NO.
3:03-CV-940-RNC

US DISTRICT COURT
HARTFORD CT

VS.

EXPANETS, INC. and
EXPANETS OF NORTH AMERICA, LLC,

Defendants.

November 6, 2003

**PLAINTIFF'S MOTION TO COMPEL THE PRODUCTION
OF INFORMATION AND DOCUMENTS.**

Pursuant to Rule 37, Plaintiff, Maria DeGennaro, hereby moves to compel Defendants, Expanets, Inc. and Expanets of North America, LLC, to produce documents responsive to Plaintiff's Interrogatories and Request for Production of Documents -- Set No. 1 ("Discovery Request"). As explained in the accompanying Memorandum of Law, although Defendants served written Objections and Responses to Plaintiff's Discovery Request on or about October 6, 2003, Defendants have failed and refused to produce any documents or information responsive to the Discovery Request. In addition, as also explained below, Defendants have improperly attempted to limit the scope of their responses to certain parts of the Discovery Request in an effort to deprive Plaintiff of discovery to which she is entitled. For these reasons, as well as the reasons fully explained in the accompanying Memorandum of Law, the Court should require

ORAL ARGUMENT REQUESTED

WILLIAM at the request of the moving party. Oral argument scheduled to be heard on December 4, 2003 is cancelled. SO ORDERED.

John F. Martineau, U.S.M.J.
12/1/03

403 DEC - 1 P 03
US DISTRICT COURT
HARTFORD CT