

IN THE UNITED STATES DISTRICT COURT **FILED**
FOR THE DISTRICT OF CONNECTICUT

MARIA DEGENNARO, :
 :
 Plaintiff, :
 :
 VS. :
 :
 EXPANETS, INC. and :
 EXPANETS OF NORTH AMERICA, LLC, :
 :
 Defendants. :

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CIVIL ACTION NO.
3:03-CV-940-RNC
US DISTRICT COURT
HARTFORD CT

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

Defendants to produce all information and documents requested by Plaintiff in the Discovery Request without further delay.

Respectfully submitted,



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