IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

TNA Entertainment, LLC,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	
	§	
Charles "Carlos" Ashenoff,	§	
	§	
Defendant,	§	CIVIL ACTION NO.: 3:08-cv-522-B
	§	CIVIL ACTION NO.: 5.00-CV-522-D
V.	§	
	§	
Jeffrey L. Jarrett, Dixie Carter, Paul W.	§	
Taylor III (p/k/a Terry Taylor), and	§	
Wayne Keown (p/k/a Dutch Mantel),	§	
	§	
Third-Party Defendants	§	

PLAINTIFF TNA ENTERTAINMENT, LLC'S OPPOSED MOTION TO COMPEL DISCOVERY RESPONSES FROM DEFENDANT CHARLES "CARLOS" ASHENOFF

Plaintiff TNA Entertainment, LLC ("TNA" or "Plaintiff") respectfully files this Opposed Motion to Compel the Production of Discovery Responses pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Rule 7.1. In support of this motion, Plaintiff relies on the attached Brief in Support of Plaintiff's Opposed Motion to Compel Discovery Responses from Defendant Charles "Carlos" Ashenoff, the Appendix to such Brief, as well as all pleadings and exhibits in the record. Respectfully submitted,

FULBRIGHT & JAWORSKI L.L.P.

<u>/s/ Richard S. Krumholz, Esq.</u> Richard S. Krumholz Texas Bar No. 00784425 William P. Finegan Texas Bar No. 07008700

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ATTORNEYS FOR PLAINTIFF TNA ENTERTAINMENT, LLC

CERTIFICATE OF SERVICE

This pleading was served in accordance with the Federal Rules of Civil Procedure by regular U.S. mail and via ECF on the following counsel of record on January 6, 2009:

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<u>/s/ Richard S. Krumholz</u> Richard Krumholz