

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PANAMA DIVISION

DIRECTV, INC., a California corporation,

Plaintiff,

vs.

CASE NUMBER: 5:03cv23-RH/WCS

JIM COWART,

Defendant

MOTION TO COMPEL

The Defendant, Jim Cowart, by and through counsel, moves this honorable Court to enter an order compelling the Plaintiff to respond to Defendant's discovery request, and as grounds therefor states as follows:

1. On or about March 11, 2003, prior to the time allowable under the Federal Rules of Civil Procedure, the Defendant propounded Interrogatories and a Request for Production to the Plaintiff.
2. The Defendant and Plaintiff agreed to stay the response to the Interrogatories until the time allowable under the Initial Pre-Trial Scheduling Order.
3. To date, the Plaintiff has yet to respond to the Interrogatories or the Request for Production. The Defendant's ability to defend this matter at trial has been hindered by the Plaintiff's lack of production.
4. Pursuant to Local Rule, the Defendant has consulted with the Plaintiff who has agreed to the granting of this order.

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FILED

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WHEREFORE, based upon the foregoing, the Defendant, Jim Cowart, requests this honorable Court enter its order compelling the Plaintiff to respond to discovery on or before August 8, 2003.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to JAMES A. BOATMAN, ESQ., Stump, Storey & Callahan, P.A., Attorney for Plaintiff, P. O. Box 3388, Orlando, Florida 32802-3388, by U. S. Mail, postage prepaid, this 30 day of July, 2003.



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