



Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmflaw.com
lmenninger@hmflaw.com

August 10, 2016

Via Facsimile (212) 805-7925

Hon. Robert W. Sweet
United States District Judge
United States District Court
Daniel Patrick Moynihan Courthouse
Southern District of New York
500 Pearl Street, Room 1940
New York, New York 10007-1312

Re: Giuffre v. Maxwell, 15-cv-07433-RWS

Dear Judge Sweet:

This is a letter motion requesting that the Court permit the filing of Ms. Maxwell's Motion to Compel Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions in excess of the 25 pages permitted pursuant to this Court's Practice Standard 2D.

As grounds, she avers as follows:

Local Rule 37.1 provides: "Upon any motion or application involving discovery or disclosure requests or responses under Fed. R. Civ. P. 37, the moving party shall specify and quote or set forth verbatim in the motion papers each discovery request and response to which the motion or application is addressed. The motion or application shall also set forth the grounds upon which the moving party is entitled to prevail as to each request or response. Local Civil Rule 5.1 also applies to the motion."

Local Rule 5.1 provides: "A party seeking or opposing relief under Fed. R. Civ. P. 26 through 37 inclusive, or making or opposing any other motion or application, shall quote or attach only those portions of the depositions, interrogatories, requests for documents, requests for admissions, or other discovery or disclosure materials, together with the responses and objections thereto, that are the subject of the discovery motion or application, or that are cited in papers submitted in connection with any other motion or application. See also Civil Local Rule 37.1."

So ordered
Sweet
USA
8-11-16

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Ms. Maxwell hereby seeks relief pursuant to Fed. R. Civ. P. 37 based on a number of Plaintiff's deficient discovery responses. As required by the Local Rules, her brief quotes verbatim each discovery request and response to which the motion is addressed. Due to the length of Plaintiff's (overbroad) objections, those verbatim responses take up a substantial portion of the motion. As a consequence, more than 25 pages are necessary to fully set forth both the quoted requests and responses as well as the argument for relief.

Ms. Maxwell therefore requests leave of the Court to file the motion within __ pages.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on August 10, 2016, I electronically served this *LETTER MOTION* via ELECTRONIC MAIL on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflp.com
mschultz@bsflp.com

Bradley J. Edwards
Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons
Nicole Simmons