



DISTRICT COURT
FILED

OCT 10 2014

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY

STATE OF OKLAHOMA

2014 OCT 10 PM 12:12

IN RE THE MARRIAGE OF:

[Redacted]
Petitioner,

And

[Redacted]
Respondent.

SALLY HOWE SMITH
COURT CLERK

Case Number: [Redacted]
Judge [Redacted]

RESPONDENT'S RESPONSE TO PETITIONER'S MOTION FOR SANCTIONS

COMES NOW, Respondent by and through his attorney of record, Travis Barnett, and for his response to Petitioner's Motion for Sanctions, states as follows:

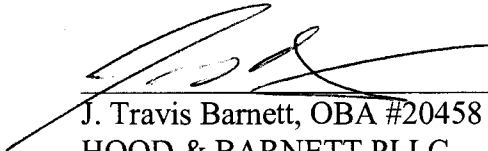
1. Respondent admits paragraphs one through three of the Motion to the extent the Petitioner filed her Motion to Compel; however, in said Motion to Compel the dates for submission of discovery requests are different from those listed in this motion. Furthermore, Attorney for Respondent is only aware of the requests submitted on April 30, 2014, which were submitted to previous counsel, and no further previous requests have been submitted to the current attorney of record.
2. Respondent denies the allegations of paragraph four of this Motion. Counsel did confer prior to the July 29th court hearing and agreed responses were to be submitted within 7 days. Furthermore, responses were provided to counsel on August 5, 2014. The only other correspondence on this issue was sent by attorney for Petitioner on August 26, 2014, in a response to Respondent's settlement offer in which counsel simply states not all requests had been answered however does not indicate what specifically was deficient. Counsel has failed to speak with attorney for Respondent by telephone or in person to confer on what responses provided on August 5, 2014, are deficient as required by 12

O.S. §3237.

3. Respondent denies the allegations of paragraphs five (5) and six (6) of the Motion.
4. Attorney for Respondent is completely unaware of how Respondent has failed to comply with the Court's order and is completely unaware of what discovery deficiency exists. Attorney for Respondent would welcome a conference on this matter in order to resolve this issue.

WHEREFORE, premises considered, Respondent requests this Court deny Petitioner's Motion as having failed to comply with 12 O.S. §3237, grant him his attorney fees and costs, and any further relief this court deems just and proper.

Respectfully submitted:


J. Travis Barnett, OBA #20458
HOOD & BARNETT PLLC
1325 E 15th Street Suite 205
Tulsa, Oklahoma 74120
Telephone: (918) 794-0391
Facsimile: (918) 743-6501
Attorney for [REDACTED]

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10th day of October 2014, a true and correct copy of the within and foregoing instrument was either mailed by first class mail, postage prepaid, faxed, or hand-delivered to the following person(s):

James C. Morton
1516 S. Boston Ave Suite 116
Tulsa, OK 74119


J. Travis Barnett, Attorney for [REDACTED]