



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

[REDACTED])
)
Petitioner,)
)
v.)
)
[REDACTED])
)
Respondent.)

Case No. [REDACTED]
[REDACTED]

DISTRICT COURT
FILED

OCT 02 2014

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

PETITIONER'S MOTION FOR SANCTIONS


COME NOW the Petitioner, by and through her attorney, James C. Morton, and for her Motion for Sanctions, alleges and states as follows:

1. That on February 17, 2014, and April 30, 2014, the Petitioner submitted her Discovery Requests to Respondent's attorney.
2. That on June 20, 2014, the Petitioner filed her Motion to Compel Discovery Responses.
3. That on July 29, 2014, the Petitioner's Motions to Compel were confessed by Respondent, and Respondent was ordered to provide responses to Petitioner's Discovery Requests within seven (7) days.
4. That counsel for Petitioner has conferred with counsel for Respondent regarding the deficient and absent Discovery Responses, yet compliance with the Court's Orders regarding Discovery Responses has not been followed by Respondent.
5. As of the filing of this Motion for Sanctions, the Respondent has incompletely and evasively responded to Petitioner's First Set of Discovery Requests and has wholly failed to respond to Petitioner's Second Set of Discovery Requests.
6. That pursuant to 12 O.S. §3237, the Petitioner requests the Respondent be sanctioned by the Court refusing to allow the Respondent to support or oppose at trial all issues which are the subject of the Discovery Requests. Further, the Court should strike from the pleadings all the Respondent's requests for relief.

SALLY HOWE SMITH
COURT CLERK
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WHEREFORE, premises considered, the Petitioner prays that this Honorable Court find in favor of Petitioner's Motion for Sanctions and grant Petitioner the relief requested hereinabove. Further, Petitioner requests the Court award Petitioner her attorney fees incurred in the preparation, filing and prosecution of the Motions to Compel and Motion for Sanctions and order Respondent to pay said fees instant.

Respectfully submitted,


A handwritten signature in black ink, appearing to read 'JCM', is written over a horizontal line.

James C. Morton, OBA #13601
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918-584-2430 fax
Attorney for Petitioner

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the _____ day of September, 2014, a true and correct copy of the above and foregoing document was mailed via United States Postal Service with the proper postage prepaid thereon, as follows:

J. Travis Barnett, Esq.
1325 East 15th Street
Suite 205
Tulsa, OK 74120



James C. Morton