



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

2014 JUN 20 PM 12:35

DISTRICT COURT
FILED

JUN 20 2014

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

[REDACTED] SALLY HOWE SMITH
COURT CLERK
Petitioner,)
)
v.)
)
[REDACTED])
)
Respondent.)

Case No. [REDACTED]

Docket "[REDACTED]"

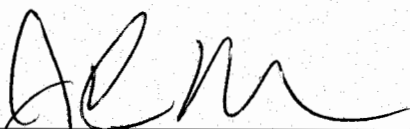
PETITIONER'S MOTION TO COMPEL DISCOVERY RESPONSES

COMES NOW the Petitioner, by and through her attorney of record, James C. Morton, and in support of her Motion to Compel alleges and states as follows:

1. That on April 17, and April 30, 2014, the Petitioner delivered to Respondent's attorney copies of the Petitioner's Discovery requests.
2. That as of the date of the filing of this Motion the Petitioner has not received a response to either set of Discovery request.
3. That the counsel for Petitioner has in good faith attempted to resolve the matter through talking with counsel for Respondent and sending counsel a letter.
4. The Discovery is necessary for trial preparation.
5. That Petitioner requests and order compelling the Respondent's full and complete responses to Petitioner's Discovery requests.
6. That the Petitioner has incurred attorney fees, associated with the preparation, filing and prosecution of this Motion for which Petitioner requests judgment.

WHEREFORE, premises considered, the Petitioner prays that this Honorable Court find in favor of Petitioner's Motion and Compel the Discovery responses and award Petitioner her attorney fees incurred herein.

Respectfully Submitted,



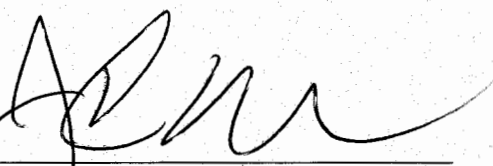
James C. Morton OBA# 13601
1516 S. Boston Ave., Suite 116
Tulsa, OK 74119
918-582-0212 ph.
918-584-2430 fax

Attorney for Petitioner

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the _____ day of _____, 2014, a true and correct copy of the above and foregoing document was placed in the United States mail with postage fully prepaid thereon, addressed to the following:

Bill Raynolds
1914 S Boston Ave
Tulsa, OK 74119



James C. Morton