



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

[REDACTED]  
Petitioner,  
vs.  
[REDACTED]  
Respondent.

Case No. [REDACTED]

Judge [REDACTED]

DISTRICT COURT  
**FILED**

MAY 04 2012

BALLY HOWE SMITH, COURT CLERK  
STATE OF OKLA, TULSA COUNTY

**MOTION TO QUASH RESPONDENT'S DISCOVERY REQUESTS  
TO PETITIONER**

COMES NOW the Petitioner, [REDACTED] by and through her attorneys of record, P. Gae Widdows and Katherine R. Morelli of the firm Bonham & Howard, P.L.L.C., and for her *Motion to Quash Respondent's Discovery Requests to Petitioner*, states as follows:

1. On May 1, 2012 the attorney for Respondent issued Respondent's Discovery Requests to the Petitioner. The Petitioner asserts that this Court should quash said discovery requests pursuant to the *Scheduling Conference Order* entered and filed on October 24, 2011, wherein discovery was to be requested by 5:00 o'clock p.m. on October 31, 2011, and discovery was to have been completed by the statutory time, December 8, 2011. The discovery deadlines mandated in the initial *Scheduling Conference Order* have not been modified.

2. At the April 2, 2012 status conference, this Court ordered the parties to attend mediation with Hugh Rineer, on June 4, 2012, and the same is currently scheduled.

**WHEREFORE**, premises considered, the Petitioner respectfully requests that this Court quash the Respondent's discovery requests to the Petitioner, issued on May 1, 2012, grant her attorney fees and costs of bringing this *Motion*, and any and all such further relief as this Court deems just and proper.

Respectfully submitted,

Katherine R. Morelli

By: P. Gae Widdows, OBA #9585  
Katherine R. Morelli, OBA #30181  
**BONHAM & HOWARD, P.L.L.C.**  
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918-744-7440 / 918-744-9358 - fax  
**ATTORNEYS FOR PETITIONER**

**CERTIFICATE OF MAILING**

I hereby certify that on the 4<sup>th</sup> day of May, 2012 a true and correct copy of the foregoing *Motion to Quash Defendant's Discovery Requests to Petitioner* was mailed postage prepaid thereon to the following:

William F. Raynolds, II., Esq.  
**HOOD & RAYNOLDS**  
1914 South Boston Avenue  
Tulsa, Oklahoma 74119

Katherine R. Morelli

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