

to comply with the requests, as set forth in paragraph 4 of the Motion.

6. Respondent denies paragraph 5 of the Motion.

7. Respondent admits that counsel spoke on October 6, 2016 via telephone and denies that Respondent has refused to comply with the requests, as set forth in paragraph 6 of the Motion.

8. Respondent denies paragraph 7 of the Motion.

WHEREFORE, Respondent [REDACTED] respectfully requests that this Court deny Petitioner's *Motion to Compel Discovery Responses* and grant such other relief to which Respondent may be entitled and which the Court deems equitable and just.

Respectfully submitted,

CORDELL | CORDELL



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CERTIFICATE OF SERVICE


The undersigned hereby certifies that on the 3rd day of November 2016, a true and correct copy of the above and foregoing instrument was:

- mailed with postage prepaid thereon;
- mailed by certified mail, Return Receipt No. _____;
- transmitted via facsimile or electronic mail; or
- hand delivered.

to the following:

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