

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

RANDY SQUIRES, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C. A. No.1:05cv1120 (JR)
	:	
THE DISTRICT OF COLUMBIA,	:	
	:	
Defendant.	:	

**DEFENDANT DISTRICT OF COLUMBIA’S
MOTION TO COMPEL**

Defendant District of Columbia, through counsel and pursuant to Fed. R. Civ. Pro. 37(a), hereby moves the Court to compel the Plaintiffs to produce responses to Defendant’s First Set of Interrogatories and produce Plaintiffs for deposition. In support of this motion, Defendant states the following:

1. Plaintiffs filed the instant lawsuit against Defendant on June 6, 2005, alleging unlawful employment practices in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000(e), and 42 U.S.C. §1981.
2. District served its First Set of Interrogatories July 11, 2006.
3. District has also requested that Plaintiffs appear for a deposition.
4. After months of promising that Plaintiffs would respond to the District’s discovery requests, Plaintiffs have not done so.
5. This matter is set for a pretrial conference on March 29, 2006 and trial on April 9, 2007.

WHEREFORE, District respectfully requests this Court to Order the Plaintiffs to provide the District with responses to discovery requests no later than March 16, 2007 and that Plaintiffs appear for a deposition no later than March 23, 2007.

Respectfully submitted,

LINDA SINGER
Acting Attorney General for the
District of Columbia

GEORGE VALENTINE
Deputy Attorney General
Civil Litigation Division

/s/NICOLE L. LYNCH/S/
NICOLE L. LYNCH [471953]
Chief Civil Litigation Division Section II

/s/David A. Jackson/s/
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	:	
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**MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF DEFENDANTS' MOTION TO COMPEL**

1. Fed. R. Civ. Pro. 37.
2. The record herein.
3. The inherent power of the Court.

Respectfully submitted,

LINDA SINGER
Acting Attorney General for the
District of Columbia

GEORGE VALENTINE
Deputy Attorney General
Civil Litigation Division

/s/NICOLE L. LYNCH/S/
NICOLE L. LYNCH [471953]
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/s/David A. Jackson/s/

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