

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

Adam Steele, Brittany Montrois, and
Joseph Henchman, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

United States of America,

Defendant.

Case No. 14-cv-01523-RCL

MOTION TO COMPEL

On behalf of the Plaintiffs, Plaintiffs hereby motion the Court pursuant to Rule 37 of the Federal Rules of Civil Procedure to compel Defendant to fully respond to Plaintiffs' Third Set of Interrogatories. A brief, draft order and certification relating to efforts made to resolve the matter are attached in support of this motion. As a motion for summary judgement and related brief are due by March 23rd, and the information is needed for such filing, the attached draft order directs Defendant to supply complete answers no later than five (5) after the date of entry of the order. The motion is authorized under Fed. R. Civ P. 37(a)(3)(B), (4).

The undersigned drafted the Third Set of Interrogatories and was the main member of Plaintiffs' counsel who communicated with counsel for Defendant regarding these interrogatories. Prior to filing, drafts of the documents filed herewith were supplied to co-counsel Motley Rice LLC for

comments. Changes were made consistent with the vast majority of their comments.

Respectfully submitted,

/s/ Allen Buckley

Allen Buckley LLC

LAW OFFICE OF ALLEN BUCKLEY LLC

Allen Buckley

ab@allenbuckleylaw.com

2727 Paces Ferry Road, Suite 750

Atlanta, GA 30339

Telephone: (678) 981-4689

Facsimile: (855) 243-0006

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Counsel for Plaintiffs Adam Steele, Brittany Montrois, Joseph Henchman, and the Class