

IN THE CIRCUIT COURT OF THE 15th
JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

CASE NO.: 502005CA001771XXXXMBAE

ELWOOD GARY BAKER,

Plaintiff,

vs.

NITV, LLC,

Defendant,

vs.

NITV FEDERAL SERVICES, LLC,
LOURDES IRIMIA, JAMES KANE and
CHARLES HUMBLE,

Third Party Defendants.

_____ /

MOTION TO COMPEL

Plaintiff, ELWOOD GARY BAKER, by and through his undersigned attorneys, pursuant to the Florida Rules of Civil Procedure, hereby files this Motion to Compel Response and Production to Request for Production and states:

1. On May 19, 2021 Plaintiff served a Request for Production to NITV Federal Services, LLC.
2. NITV Federal Services, LLC's response to the Request for Production was due on June 18, 2021.
3. To date NITV Federal Services, LLC's has failed to respond to the Request for Production.
4. Plaintiff requires both NITV's response and production as depositions of non-parties have been scheduled in this matter on July 8, 2021 and July 14, 2021.
5. Additionally, Plaintiff has been trying to schedule NITV Federal Services, LLC's corporate designee deposition and Plaintiff is in need of both NITV's response and production as the discovery deadline in this matter is July 19, 2021.

WHEREFORE, Plaintiff Elwood Gary Baker respectfully requests this Court enter an order requiring NITV Federal Services, LLC to serve it response and production to Plaintiff's May 19, 2021 Request for Production forthwith.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 23rd day of June, 2021 pursuant to Fla. R. Jud. Admin. 2.516, a true copy of the foregoing document is being electronically filed and thereby e-served via Florida e-Portal on all counsel/parties affiliated with this case in the manner specified within the e-portal changes effective June 20, 2014. (Note: Alternate e-mail addresses on the e-portal will be "checked" for service, and anyone affiliated with this case but not registered on the e-portal will be served in the manner specified by the aforementioned Rule.)

Persons served: William Fleck, Esq. wfleck@jla.legal; ptaylor@jla.legal;
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