

GERALD ANTHONY GARCIA
Plaintiff

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IN THE DISTRICT COURT

V.

438th JUDICIAL DISTRICT

VIA METROPOLITAN TRANSIT
Defendant

OF BEXAR COUNTY, TEXAS

MOTION TO COMPEL ANSWERS TO INTERROGATORIES

Plaintiff Gerald Garcia moves that this court enter an order compelling defendant VIA Metropolitan Transit to answer interrogatories, and in support of his motion states:

1. On July 15, 2009, plaintiff served his first set of interrogatories on defendant.
2. On August 31, 2009, plaintiff by letter reminded plaintiff’s lawyer that answers to interrogatories were overdue and had not yet been received. No response to this letter has been received.
3. Over 100 days have passed since plaintiff served interrogatories on defendant and to date no answers have been received.

WHEREFORE, plaintiff requests the court to order defendant to serve interrogatory answers within ten days and award reasonable expenses, including attorney’s fees, to plaintiff incurred as a result of making this motion.

Mark Kx
 Attorney for Plaintiff
 1234 Third St
 San Antonio, TX 78209
 (210)-555-5555