

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,
Plaintiff

v.

ROBERT F. STROM as the Finance Director of
THE CITY OF CRANSTON,
THE CITY OF CRANSTON, and
COL. MICHAEL J. WINQUIST in his official
capacity as Chief of the CRANSTON POLICE
DEPARTMENT
Defendants

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C.A. No. 15-525

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PLAINTIFF'S MOTION TO COMPEL DEFENDANTS TO RESPOND TO
REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 37(a)(1), Plaintiff hereby moves for an order compelling Defendants to respond to requests for product served on Defendants on December 23, 2015. On January 29, 2016, the Court had entered a text order staying discovery "until the Court issues a decision on Plaintiff's Motion for Partial Summary Judgment in Richer v. Parmelee 15-162." The Court issued that Decision on June 1, 2016. However, despite Plaintiff's August 2, 2016 request for discovery responses, Defendants have still not responded.

Rule 37(a)(1) Certification

Plaintiff Edward A. Caniglia hereby certifies that he has conferred with opposing counsel in good faith in an effort to resolve the discovery differences raised in this Motion, without success.

Respectfully submitted,

Edward A. Caniglia

By his attorneys,

/s/ Thomas W. Lyons

Thomas W. Lyons #2946

Rhiannon S. Huffman #8642

RHODE ISLAND AFFILIATE,
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CERTIFICATION

I hereby certify that on August 11, 2016 a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas W. Lyons