

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:20-11933-DPW

BRANDON ALVES et al.

Plaintiffs.

v.

DONNA M. MCNAMARA, et al.

Defendants.

**DEFENDANT COMMISSIONER LONG'S MOTION TO COMPEL RESPONSES TO
THE DEFENDANT'S REQUEST FOR PRODUCTION AND ANSWERS TO
INTERROGATORIES**

Defendant, Gregory Long (“acting Commissioner Long”), hereby moves this Honorable Court pursuant to Fed. R. Civ. P. 37(a) to compel the Plaintiffs to produce the requested documents and answer the propounded interrogatories.

- 1) On May 7, 2021 Counsel for acting Commissioner Long propounded upon Plaintiffs its first Requests for the Production of Documents pursuant to Fed. R. Civ. P. 34. (See Exhibit A.)
- 2) On May 7, 2021 Counsel for acting Commissioner Long propounded Interrogatories upon the Plaintiffs pursuant to Fed. R. Civ. P. 33. (See Exhibit B.)
- 3) Pursuant to the Federal Rules of Civil Procedure, Plaintiffs’ responses to the written discovery was due June 10, 2021.
- 4) As of this date, acting Commissioner Long has received no responses to the document request or answers to interrogatories propounded on the Plaintiffs. On July 14, 2021, Plaintiff produced various documents control-stamped Alves000001-Alves000066.)
- 5) As such, Commissioner Long requests that this court order Plaintiffs to respond to both the document requests and interrogatories without objection.

Dated: July 14, 2021

Respectfully submitted:
DEFENDANT GREGORY LONG

By his attorney:
Henry Luthin,
Corporation Counsel

/s/ John Fahey
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L.R. 37.1 CERTIFICATION

Pursuant to Local Rule 37.1(a), while the parties have not discussed a motion to compel, Counsel for acting Commissioner Long has had ongoing conversations with Plaintiffs' Counsel regarding the outstanding discovery requests, who has represented that the responses were forthcoming. Prior to filing the instant motion, Counsel for the acting Commissioner Long reached out to Counsel for the Plaintiffs but has not heard back.

/s/ John Fahey
John Fahey