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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland Division

**OBSIDIAN FINANCE GROUP, LLC and
KEVIN D. PADRICK,**

Plaintiffs,

v.

CRYSTAL COX,

Defendant.

Civil No. CV 11-0057 HZ

**PLAINTIFFS' FRCP 37 MOTION
TO COMPEL**

***EXPEDITED CONSIDERATION
REQUESTED***

L.R. 7.1 CERTIFICATION

The undersigned counsel of record for plaintiffs Obsidian Finance Group, LLC and Kevin D. Padrick ("Plaintiffs") hereby certifies that he made a good faith effort to resolve the issues raised in this Motion with defendant Crystal Cox ("Defendant") by electronic mail (as shown in the supporting Declaration of David S. Aman), but was unable to resolve the issues.

MOTION

Plaintiffs move the Court, pursuant to FRCP 37, for an order requiring defendant Crystal Cox to (1) produce the documents requested in Request Nos. 1, 3, 5, 6 and 8 of Plaintiffs' First Request for Production of Documents ("Requests") and (2) answer Interrogatory No. 3 of Plaintiffs' First Set of Interrogatories ("Interrogatories"). Copies of the Requests and Interrogatories are attached as Exhibit 1 to the supporting Declaration of David Aman, filed with this motion.

This motion is supported by the accompanying memorandum in support, the Declaration of David S. Aman, and the pleading and papers on file in this case.

DATED this 9th day of November 2011.

TONKON TORP LLP

By: /s/ David S. Aman

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PLAINTIFFS' FRCP 37 MOTION TO COMPEL** on:

Crystal L. Cox
PO Box 505
Eureka, Montana 59917

Crystal @CrystalCox.com
savvybroker@yahoo.com

- by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to said party's last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below;
- by causing a copy thereof to be e-mailed to said party at her last-known email address on the date set forth below;

DATED this 9th day of November 2011.

TONKON TORP LLP

By /s/ David S. Aman

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