

IN THE STATE OF MISSOURI  
JACKSON COUNTY DISTRICT COURT  
AT INDEPENDENCE,  
MISSOURI

SAMUEL K. LIPARI )  
(Assignee of Dissolved )  
Medical Supply Chain, Inc.) )  
*Plaintiff* )

**MOTION TO COMPEL PRODUCTION  
OF DISCOVERY REQUESTS**

vs. )

GENERAL ELECTRIC COMPANY, )  
GENERAL ELECTRIC CAPITAL )  
BUSINESS ASSET FUNDING CORP., )  
GE TRANSPORTATION SYSTEMS )  
GLOBAL SIGNALING, L.L.C. )  
*Defendants* )

Case No. 0616-cv07421

**MOTION TO COMPEL PRODUCTION OF DISCOVERY REQUESTS**

Comes now the petitioner, Samuel K. Lipari ("plaintiff") appearing *pro se* and respectfully submits the following motion to compel production of the plaintiff's discovery requests.

1. Plaintiff served notice of requests for production on the defendants on January 19, 2007.
2. As of February 22, 2006 there has neither been production of the requested documents or any objections.
3. The defendants have over 900 attorneys for internal corporate counsel and one of this state's largest and most prestigious law firms representing them.

"With over 950 in-house lawyers as well as top outside counsels such as Sidley Austin and Jones Day, General Electric's legal team is larger than most law firms. Lawyers provide legal advice in every aspect of the company, including GE Insurance, GE Medical Systems and NBC, and in every geographical location, including the Netherlands, Ireland, and India. Newly appointed Vice President/General Counsel, Brackett B. Denniston III manages the worldwide legal operations of General Electric. Previous General Counsel, Ben W. Heineman, Jr., now oversees all legal matters as Senior Vice President of Law and Public Affairs."

"General Electric", By Joann Chang; Lawcrossing

4. The contract based claims being brought by the plaintiff have been before the defendants since June 18, 2003.

5. The defendants have been on notice since October 21, 2003 that they must preserve all electronic and paper records related to the plaintiff's claims.

6. No valid reason can possibly explain the failure of the defendants to follow court orders for mediation, answer pleadings or participate in discovery except for the bad faith purpose of delay and to obstruct justice.

Respectively submitted,

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Samuel K. Lipari  
*Pro se*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was forwarded this 23rd day of January, 2007, by first class mail postage prepaid to:

Leonard L. Wagner and John K. Power, Esq., Husch & Eppenberger, LLC  
1700 One Kansas City Place 1200 Main Street Kansas City, MO 64105-2122

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*Pro se*