

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

**THIRD MOTION TO COMPEL PRODUCTION OF DISCOVERY REQUESTS**

Comes now the petitioner, Samuel K. Lipari ("plaintiff") appearing *pro se* and respectfully submits the following third motion to compel production of the plaintiff's discovery requests and to grant a continuance of the jury trial until at least thirty days after the defendants have produced discovery.

1. Plaintiff served notice of requests for production on the defendants on January 19, 2007.
2. On February 24th, 2007 the plaintiff received a late response from the defendants to his request for production of documents.
3. The response was a blanket objection to all three-production requests.
4. No documents were identified as be protected by privilege.
5. On April 7<sup>th</sup>, the plaintiff sent the following Golden Rule letter to the defendants:

“April 7, 2007

John K. Power

Re: Golden Rule Letter

Dear John,

I have received none of the requested discovery documents from you. Furthermore I have received no documents relevant to my complaint from you and no documents from which any defense could be asserted. Instead I have received from you a frivolous blanket denial of discovery that obstructs justice in this matter and the related private and government proceedings.

Please understand that if any part of the State of Missouri court systems or any officers of the court mistakenly believe discovery no longer is permitted in a civil proceeding I will have to devote time and resources to disabuse them of that belief.

I will expect the evidence I have requested in the discovery served upon you to be delivered to me at 297 NE Bayview, Lee’s Summit, MO 64064 by Friday April 13, 2007 at 3.00 pm.

Sincerely,

Samuel K. Lipari”

6. No documents have yet been produced by the defendants.

**SUGGESTION IN SUPPORT OF SECOND MOTION TO COMPEL**

The court may order any party to produce documents or papers, which contain evidence relevant to the subject matter involved in the pending action. Rule 56.01.

**CONCLUSION**

Whereas because the defendants have produced no discovery and have not identified specific records protected from discovery by privilege, the plaintiff respectfully requests that the court order the defendants to produce all requested records or specifically identify records sought to be excluded so they may be examined in camera. Additionally the plaintiff respectfully requests that the jury trial be

postponed until at least 30 days after the defendants have produced the requested discovery.

Respectively submitted,

S/Samuel K. Lipari  
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 2nd day of October 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

S/Samuel K. Lipari  
Samuel K. Lipari  
297 NE Bayview  
Lee's Summit, MO 64064  
816-365-1306  
saml@medicalsupplychain.com  
*Pro se*