

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DAVID SCHIED, an individual

Plaintiff,

vs.

Case No. 2:15-cv-11840

Judge Avern Cohn

Magistrate Judge Dawkins Davis

KAREN KHALIL, et al.

Defendants.

DAVID S. SCHIED

In Pro Per

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JAMES T. MELLON (P23876)

Mellon Pries, P.C.

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**MMRMA'S OBJECTIONS TO PLAINTIFF'S FIRST INTERROGATORIES AND
REQUESTS FOR EXHIBITS**

NOW COMES Defendant, MMRMA, and for its Objections to Plaintiff's First Interrogatories and Requests for Exhibits, states:

1. MMRMA objects to all of Plaintiff's introduction and commentary, to the extent that it purports to impose any burden greater than Fed. R. Civ. P. 33 and/or 34.

2. MMRMA objects to Plaintiff's discovery requests for reason that they are not yet permitted. Pursuant to Fed. R. Civ. P. 26(d)(1), "A party may not seek discovery from any source before the parties have conferred as required by Rule 26(f), except in a proceeding exempted from initial disclosure under Rule 26(a)(1)(B), or when authorized by these rules, by stipulation, or by court order." Therefore, all discovery requests are premature, as the required conference has not occurred.

3. MMRMA objects to Plaintiff's interrogatories as excessive in number. Pursuant to Fed. R. Civ. P. 33(a)(1), the interrogatories are limited to 25, including discrete subparts. Plaintiff has submitted 23 interrogatories to MMRMA, which each must be answered separately for the years 2011-2016 (creating 138 interrogatories total), well over the 25 interrogatories permitted.

4. MMRMA reserves all other objections until such time as discovery has commenced and the requests are properly served within the time permitted for discovery.

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DATED: May 9, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2016, I served **MMRMA'S OBJECTIONS TO PLAINTIFF'S FIRST INTERROGATORIES AND REQUESTS FOR EXHIBITS** by mailing the same to all Counsel of Record and to Pro Per Plaintiff via United States Post Office, First Class Mail at the following addresses:

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May 9, 2016

David S. Schied
P.O. Box 1378
Novi, MI 48376

RE: David Schied v MMRMA, et al
Case No: 2:15-cv-11840
Our File: 1-1368-22870

Dear Mr. Schied:

Enclosed please find MMRMA's Objections to Plaintiff's First Interrogatories and Requests for Exhibits, along with Certificate of Service.

Sincerely,



James T. Mellon

JTM/smr
Enclosure

cc: Jeffrey R. Clark, Esq.
Charles W. Browning, Esq.