**IN THE IOWA DISTRICT COURT FOR POLK COUNTY**

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| IN RE THE MARRIAGE OF JOHN DOE AND JANE DOE | |
| Upon the Petition of  JOHN DOE,  Petitioner,  And Concerning,  JANE DOE,  Respondent. | CASE NO. \*\*\*\*\*\*\*\*  **MOTION TO COMPEL** |

COMES NOW Petitioner, John Doe, and in support of his Motion to Compel Discovery, states:

1. Petitioner served Requests for Production of Documents (attached as Exhibit 1) to Respondent on February 1, 2016
2. On February 8, 2016, attorney for Petitioner made a good faith effort to resolve the discovery issue by way of email to Respondent’s attorney (attached as Exhibit 2).
3. Petitioner then informally attempted to resolve this in person on February 11, 2016. Respondent’s counsel warranted that the documents would be received prior to a deposition scheduled for February 17, 2016.
4. To date, Respondent has failed to provide responses to Petitioner’s Requests for Production of Documents.
5. Petitioner and attorney for Petitioner need discovery responses to adequately prepare for trial.
6. Attorney for Petitioner has provided reasonable notice to Respondent’s attorney as required by the Iowa Rules of Civil Procedure and has attempted to resolve this matter in good faith without the Court’s intervention without success as required by Iowa Rule of Civil Procedure 1.517(5).

WHEREFORE, Petitioner prays that the Court enter an Order requiring that Respondent complete the requested discovery by a date certain and order Respondent to pay Petitioner’s attorneys’ fees associated with this motion.

Respectfully submitted,

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