

Commonwealth of Massachusetts
THE TRIAL COURT
PROBATE AND FAMILY COURT DEPARTMENT

BARNSTABLE DIVISION

DOCKET #06D-1623-DV1

Christian Johnson

PLAINTIFF

v.

Regina Johnson

DEFENDANT

**DEFENDANT'S MOTION TO COMPEL PLAINTIFF'S
RESPONSES TO DISCOVERY REQUESTS**

NOW COMES Defendant, Regina Johnson (hereinafter referred to as "Defendant") and requests that this Honorable Court allow her Motion to Compel Plaintiff's Responses to Discovery Requests.

In support of her motion, Defendant states that on January 7, 2008 the following requests were submitted to Plaintiff:

1. Request for documents relating to the Plaintiffs' business and all the entities. Said request was prepared by the forensic accountant retained by the Defendant to value the businesses. Please note that the Defendant retained the services of a forensic accountant who is ready and waiting to complete this business valuation;
2. Defendant's First Request for Production of Documents to the Plaintiff;
3. First Set of Interrogatories Propounded by the Defendant to be Answered Under Oath by the Plaintiff; and
4. Defendant's Request Pursuant to Rule 410, Supplemental Rules of the Probate Court Regarding Mandatory Self-Disclosure.

The following items are still required with respect to the 410 request:

- a. 3 years of bank statements – First American Bank, Citizen’s Bank, Ben Franklin, Bank of America
- b. Pay stubs (or 1099s) from any income source in 2007 including, but not limited to REMax and Coldwell Banker.
- c. Loan and/or mortgage applications. These include, but are not limited to the Citibank Equity Line, Cape Cod 5, and Chase Automotive (for the Jaguar not disclosed on his signed Financial Statement)
- d. Coldwell Banker financial statements, stock transfer and/or P&S resulting from the stock transfer to Plaintiff’s father

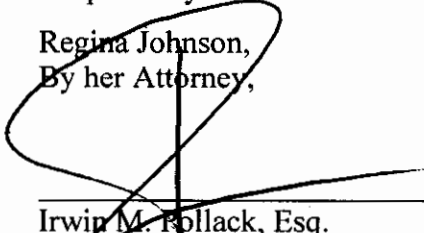
Defendant seeks judicial intervention to compel the production of the above listed documents in order to proceed with the litigation of this case. The parties have been trying to reach settlement but it has been increasingly difficult without the benefit of knowing exactly what the parties’ assets are, what liabilities, if any, the business has, and all the updated information regarding loans taken, assets which the Plaintiff may have in his possession or control, including marital assets and the like.

WHEREFORE, Defendant respectfully requests that this Honorable Court allow her Motion to Compel Plaintiff’s Responses to Discovery Requests and order the Plaintiff to forthwith produce same.

Dated: March 24, 2008

Respectfully submitted.

Regina Johnson,
By her Attorney,



Irwin M. Rollack, Esq.
Attorney for Defendant
Massachusetts Family Law Group, P.C.