

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

O. John Benisek, et al.,

Plaintiffs,

vs.

Linda H. Lamone, et al.,

Defendants.

Case No. 13-cv-3233

Three-Judge Court

PLAINTIFFS' MOTION TO COMPEL NON-PARTIES JEANNE D. HITCHCOCK, THOMAS V. "MIKE" MILLER JR., MICHAEL E. BUSCH, AND RICHARD STEWART TO TESTIFY AT DEPOSITION, AND TO COMPEL NON-PARTIES THOMAS V. "MIKE" MILLER JR., MICHAEL E. BUSCH, AND RICHARD S. MADALENO JR. TO PRODUCE DOCUMENTS

Plaintiffs O. John Benisek, Jeremiah DeWolf, Sharon Strine, Charles W. Eyler, Alonnie L. Ropp, Edmund Cueman, and Kat O'Connor, pursuant to Rule 45(g) of the Federal Rules of Civil Procedure and Local Rules 104.7 and 104.8, hereby move this Court for an order compelling non-parties Jeanne D. Hitchcock, Thomas V. Miller Jr., Michael E. Busch, and Richard Stewart to attend their depositions and testify without resting on any assertion of legislative privilege. Plaintiffs move further for an order compelling Mr. Miller, Mr. Busch, and Richard S. Madaleno Jr. to produce documents in response to Plaintiffs' subpoenas without resting on any assertion of legislative privilege.

Plaintiffs submit the attached memorandum in support of this motion.

Dated: January 3, 2017

Respectfully submitted,

/s/ Michael B. Kimberly

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January 2017, a copy of the foregoing Motion to Compel and the attached Memorandum of Law were filed in the United States District Court for the District of Maryland, electronically served upon all counsel of record through the Court's CM/ECF system, and served via electronic mail and first class mail upon counsel for non-parties Jeanne D. Hitchcock, Thomas V. Miller Jr., Michael E. Busch, Richard Stewart, and Richard S. Madaleno Jr.

/s/ Stephen M. Medlock

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