

The Honorable Carrie Runge
Hearing Date: March 3, 2017 (This is a request for special setting;
the actual date and time will be determined by the Court)
ORAL ARGUMENT REQUESTED
OVER TEN MINUTES

SUPERIOR COURT OF WASHINGTON
FOR BENTON COUNTY

JULIE M. ATWOOD,

Plaintiff,

vs.

MISSION SUPPORT ALLIANCE, LLC,
STEVE YOUNG, an individual, and DAVID
RUSCITTO, an individual,

Defendants.

Case No.: 15-2-01914-4

**PLAINTIFF'S AMENDED MOTION FOR
CONTEMPT AND SANCTIONS
UNDER CR 37 AND CR 26(g)**

Noted for Hearing: March 3, 2017

Plaintiff respectfully moves the Court for an order (1) holding Defendant Mission Support Alliance, LLC in contempt of Court for violating the Court's order compelling production of documents; (2) finding that MSA willfully failed to produce documents properly requested months ago and only produced some documents after it became clear that MSA's motion to quash the Sandra Fowler subpoena was denied, so the documents would be produced by Ms. Fowler at her deposition; (3) directing MSA's counsel to certify that the company is withholding no documentation responsive to Plaintiff's Interrogatory No. 16, as originally drafted by Plaintiff and not as limited by Defendant in its discovery answers; (4) permitting Plaintiff to continue the deposition of Sandra Fowler related to her complaint of gender discrimination and retaliation; (5) permitting Plaintiff to continue the deposition of

PLAINTIFF'S AMENDED MOTION FOR
CONTEMPT AND SANCTIONS UNDER
CR 37 AND CR 26(g) - 1

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1 Todd Beyers related to documents of complaints and investigation involving Beyers that were
2 not timely produced; (6) requiring MSA to pay Plaintiff's reasonable attorney's fees and all
3 costs related to additional discovery caused by MSA's improper actions; (7) and awarding
4 other relief as the Court deems just, including a penalty for the discovery violation. The issues
5 are fully addressed in Plaintiff's memorandum in support of the motion.
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7 Dated this 22nd day of February, 2017.
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10 THE SHERIDAN LAW FIRM, P.S.

11 By: 

12 John P. Sheridan, WSBA # 21473
13 705 Second Avenue, Suite 1200
14 Seattle, WA 98104
15 *Attorneys for Plaintiff*
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PLAINTIFF'S AMENDED MOTION FOR
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CERTIFICATE OF SERVICE

I, Melanie Kent, certify under penalty of perjury under the laws of the State of Washington that on February 22, 2017, I served the document to which this Certificate is attached to the party listed below in the manner shown.

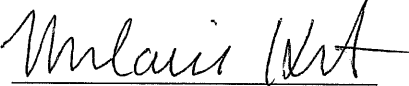
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Attorneys for Defendants


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