

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Case No.: 2011-021207-FC-04
Division: FAMILY

MARIO ALBERTO JIMENEZ,

Petitioner/Father,

and

KAREN WIZEL,

Respondent/Mother.

_____ /

MOTION FOR EX-PARTE ORDER COMPELLING DISCOVERY

Respondent, KAREN WIZEL, by and through the undersigned attorney, files this Motion for Ex-Parte Order Compelling Discovery, and states as follows:

1. A Request to Produce was filed upon the Petitioner on September 18, 2014.

2. The time for the Petitioner, MARIO ALBERTO JIMENEZ, to provide responses to the Respondent's Request to Produce has elapsed, yet no response has been received by the undersigned to date. The Petitioner has made no objections to any of the requests and has therefore waived such.

3. The Petitioner's failure to comply with the Respondent's discovery requests has caused the Respondent to incur additional attorney's fees for having to bring this motion, which but for the Petitioner's failure to comply would be unnecessary.

WHEREFORE, the Respondent respectfully requests that this honorable Court:

A. Enter an Ex-Parte Order requiring compliance by the Petitioner to the

discovery demands within 10 days upon entry of the appropriate Order by this Court;

- B. Require the Petitioner to pay a reasonable attorney's fee.
- C. Grant such other relief as the court deems just and proper.

CERTIFICATE OF SERVICE

I certify that a copy of this document was delivered by U.S. Mail to Mario A. Jimenez, 12901 S.W. 66 Terrace Drive, Miami, FL 33183, and by electronic mail to Alexander J. Alfano at aalfano@lawalfano.com on this 29th day of October, 2014.

Respectfully Submitted,

REYES MILLER, P.L.

By: /S/_____

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