

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil No. WMN 05 CV 1297
)	
JOHN BAPTIST KOTMAIR, JR., et al.,)	
)	
Defendants.)	

UNITED STATES' MOTION TO COMPEL DEFENDANTS' DISCOVERY RESPONSES

Defendants John Baptist Kotmair, Jr. and Save-A-Patriot Fellowship (SAPF) have refused to answer several of the United States' interrogatories and requests for production of documents based on groundless objections. In addition, they have failed to verify their responses to the interrogatories. Pursuant to L.R. 104.7, the undersigned has conferred in good faith with both Kotmair and SAPF's counsel, George Harp, regarding these matters. They were steadfast, however, in their refusal to answer certain of the United States' discovery requests. The Court should enter an order compelling them to answer these discovery requests in full.

In support of this motion, the United States submits herewith a memorandum and the

United States' L.R. 104.7 Certificate of Conference, with exhibits.

Respectfully submitted,

ROD J. ROSENSTEIN
United States Attorney

/s/Anne Norris Graham

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing UNITED STATES' MOTION TO COMPEL DEFENDANTS' DISCOVERY RESPONSES has been made upon the following by depositing a copy in the United States mail, postage prepaid, this 30th day of December, 2005.

John Baptist Kotmair, Jr.
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George Harp, Esq.
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