

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)
JOEY C. ALLEN,)
Plaintiff,)
v.)
PATRICK R. JONES and)
ATS INTERMODAL, LLC.)
and/or JIMMIE LEASING, LLC.)
Defendants.)
_____)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO.: 2023-CP-10-5661

**NOTICE OF MOTION
AND
MOTION TO COMPEL**

TO: JOHN JONES, ATTORNEY FOR THE DEFENDANTS

YOU WILL PLEASE TAKE NOTICE that the Plaintiff, by and through the undersigned attorney, pursuant to Rule 37 of the South Carolina Rules of Civil Procedure, moves for an Order compelling the Defendants to answer Plaintiff's Second Supplemental Interrogatories, a copy of which is attached hereto.

Pursuant to Rule 37(a)(4), the Plaintiff hereby requests that the Court order the Defendant to immediately answer Plaintiff's Second Supplemental Interrogatories. This Motion is based on Rule 37 of the South Carolina Rules of Civil Procedure, and the Statutes and laws of South Carolina.

Green Law Firm, LLC.

s/Keith Robinson

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North Charleston, South Carolina
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