

3. Undersigned counsel, on behalf of the defendant State Farm Fire and Casualty Company, propounded interrogatories to the plaintiffs on December 30, 2010. The interrogatories were, in fact, directed to both of the Gagnons at the address on file with the Court.

4. The discovery requests combine interrogatories and requests for production of documents. The total number of discovery requests propounded is 60.

5. Plaintiff's Motion to Strike appears to take issue both with the number of discovery requests propounded and with the fact that the discovery requests were propounded jointly to the two plaintiffs.

6. Plaintiff has appended both email exchanges and correspondence from the plaintiff to undersigned counsel setting forth her position and suggesting that undersigned counsel has refused to cooperate with her in resolving discovery issues. Counsel disagrees. The initial email sent by undersigned counsel to the plaintiff on January 11, 2011 suggested to the plaintiff that issues pertaining to the form of interrogatories be resolved at the time of the scheduled status conference.

7. In addition, undersigned counsel wrote to the plaintiff on January 21, 2011 addressing a number of discovery and housekeeping issues, including the discovery requests at issue.

8. State Farm has, in no way, attempted to avoid discovery obligations or engage in any inappropriate discovery activity. To the extent there have been any breakdowns in communication between the plaintiff and counsel for State Farm, the plaintiff's suggestion that those communication difficulties have been intentional or