

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

, AND DEFENDANTS

DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR ORDER TO COMPEL PRODUCTION OF DOCUMENTS AND REQUEST FOR A PROTECTIVE ORDER

COMES NOW, the Defendant(s) in the above styled and numbered civil action, by and through counsel, pursuant to M.R.C.P. 26(c), and move the Court for a Protective Order relieving them of the responsibility to respond to Plaintiff's , Motion for Order to Compel Production of Documents, and for cause therefore would show unto the Court the following:

I.

The Defendant(s) admit that they have not produced the following:

1. A complete and up-to-date audit opinion, of the deposited in the . There is no . County Inmate Funds are deposited in the Mississippi , which is kept at , MS.

2. The addresses of persons living in the free-world society who were directly involved in the incidents leading to this Civil Rights Complaint. has been provided with business addresses where he/she may correspond with all persons directly involved. The Defendant(s) object to providing residential addresses of free-world persons to a convicted felon; home addresses certainly cannot lead to discoverable information. Finally, the Defendant(s) seek a protective Order from the Court to prevent release of such information. Prison officials have a legitimate security interest in preventing from obtaining this information.

3. The name, titles and addresses of all offenders and officials who were asked to take a polygraph examination prior to , in connection with the investigation of allegations of by plaintiff. This is not a question asked by Plaintiff in his/her Request to Produce Documents. There were no persons asked to take a polygraph examination prior to , .

II.

The Defendant(s) submits that they have responded fully to the Plaintiff's Discovery Requests and provided all information to which he/she is entitled.

III.

The Defendant(s) request this Court to issue a Protective Order relieving any obligation to provide _____ with residential addresses of the free-world individuals he/she is bringing this Complaint against.

Respectfully submitted,

Attorney for

Of Counsel:

Telephone:
MSB #
Attorney for