

3. To date, Defendant has failed to answer the Post-Judgment Interrogatories and Request for Production of Documents and he has made no attempt to seek a protective Order from this Court.

4. As a result, Plaintiff is and continues to be severely hampered in her ability to enforce the Judgment she obtained against the Defendant.

5. Therefore, Defendant should be compelled to provide to the Plaintiff full and complete responses to Plaintiff's Post-Judgment Interrogatories and Request for Production of Documents.

WHEREFORE, Plaintiff, Heidi Abrams, respectfully requests that this Honorable Court enter the attached Order compelling the Defendant, Pini Ben David, to provide full, complete and verified discovery responses within twenty (20) days.

Respectfully submitted,

THE MARTIN LAW FIRM, P.C.

By: 

Jason B. Martin, Esquire
Attorney for Plaintiff