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R-17



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY  
STATE OF OKLAHOMA

DR. JIM SISNEY, an individual, )  
)  
Plaintiff, )  
)  
v. )  
)  
MARYANNE FLIPPO, SHARI )  
WILKINS, SHARON WHELPLEY, )  
as individuals and in their official )  
capacities as Members of the )  
Broken Arrow Public School Board )  
of Education; and INDEPENDENT )  
SCHOOL DISTRICT NO. 3 OF )  
TULSA COUNTY, )  
)  
Defendants. )

Case No. CJ-2008-06173  
Judge Daman Cantrell

DISTRICT COURT  
**FILED**

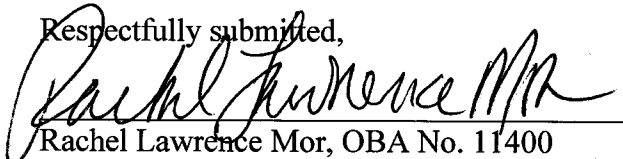
AUG 30 2012

SALLY HOWE SMITH, COURT CLERK  
STATE OF OKLA. TULSA COUNTY

MOTION TO COMPEL DISCOVERY

COMES NOW the Plaintiff, Dr. Jim Sisney, and moves this Court to order discovery which was submitted to Defendants, Maryanne Flippo, Sharon Whelpley, Shari Wilkins on April 6, 2011. Plaintiff's counsel has had numerous discovery conferences with Defense counsel who has represented to that the discovery responses will be completed and sent either in a "few days" or "by the end of the week" but in fact, the responses have never been sent.

Plaintiff requests this Court enter and order requiring the production of discovery and provide for an expedited response time of one week from the entry of the Order to Compel.

Respectfully submitted,  
  
Rachel Lawrence Mor, OBA No. 11400  
Attorneys at Law  
3037 NW 63<sup>rd</sup> Street, Suite 205  
Oklahoma City, OK 73116

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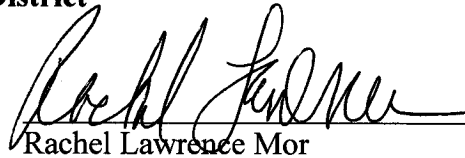
(405) 562-7771 (Telephone)  
(405) 285-9350 (Facsimile)  
**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that on August 28, 2012, a true and correct copy of the above and foregoing document was mailed to the Tulsa County District Court Clerk for filing and delivered via U.S. Mail, postage prepaid thereon, to:

Phyllis L. Walta, Esquire  
Monika Turek, Esquire  
WALTA & WALTA  
120 East Oklahoma  
P.O. Box 398  
Hennessey, OK 73742  
**Attorneys for Defendants Flippo, Whelpley and Wilkins**

Kent B. Rainey, Esquire  
ROSENSTEIN, FIST & RINGOLD  
525 South Main, Suite 700  
Tulsa, OK 74103  
**Attorney for the Broken Arrow School District**

  
Rachel Lawrence Mor