

DOCKET NO.: WWM-CV-21-5012142-S	:	SUPERIOR COURT
JANE DOE	:	J.D. OF WINDHAM
V.	:	AT PUTNAM
HYDE SCHOOL AT SOUTH WOODSTOCK, INC. and HYDE SCHOOL	:	SEPTEMBER 23, 2021

MOTION FOR NONSUIT

Pursuant to Practice Book Section 13-14, the Defendants hereby request an order of nonsuit against the plaintiff for her failure to respond to their discovery requests. In support of this motion, the defendants represent as follows:

- a. on or about July 2, 2021, the defendants directed written discovery requests to the plaintiff;
- b. the plaintiff neither objected nor moved to extend the time to respond;
- c. as of the date of this motion, the plaintiff hasn't attempted to comply.
- d. the plaintiff's compliance is necessary to evaluate this claim, and also to properly prepare our defense.

WHEREFORE, the Defendants respectfully request that their Motion for Nonsuit be granted due to the Plaintiff's failure to respond to their discovery requests.

DEFENDANTS,
HYDE SCHOOL AT SOUTH WOODSTOCK, INC.
and HYDE SCHOOL

By 
David G. Hill of
David G. Hill & Associates, LLC
Their Attorneys

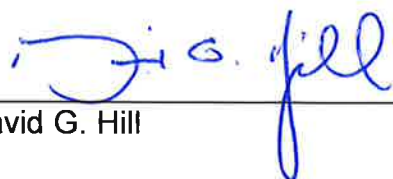
CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on this 23rd day of September, 2021, to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery.

Name and address of each party and attorney that copy was or will immediately be mailed or delivered to:

Garrett M. Moore, Sr.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Email: gmoore@mojylaw.com

Calvin Kin-Meng Woo, Esq.
Verrill, Dana, LLP
355 Riverside Avenue
Westport, CT 06880
Email: cwoo@verrill-law.com


David G. Hill