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IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

BROOKE J. MARR Petitioner, v. ALEJANDRO A. SIGALA Respondent.	)))))))))	Cause No.: 20SL-DR04564 Division: 33

RESPONDENT'S OBJECTION TO PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO RESPONDENT

COMES NOW Respondent, Alejandro A. Sigala, by and through his undersigned attorneys of record, and for his Objection to Petitioner's First Set of Requests for Production of Documents and Things to Respondent, respectfully states as follows:

1. On or about March 15, 2023, Respondent filed a Motion to Modify and Motion for Contempt currently pending in the above cause number.

2. On or about December 4, 2023, Counsel for Petitioner sent by electronic correspondence Petitioner's First Set of Interrogatories to Respondent and Petitioner's First Set of Requests for Production of Documents and Things to Respondent to Counsel for Respondent.

3. Respondent objects to Petitioner's First Set of Requests for Production of Documents and Things to Respondent as Petitioner failed to respond to each of her Requests and therefore, Petitioner's Request for Production of Documents does not comply with the local rule of 58.1 (2).

4. St. Louis County Circuit Court's local rule 58.1(2) states *that any party who serves a party with a Request for Production shall attach a copy of any such document that they would be required to produce had the request been made to them.*

WHEREFORE, Respondent prays for a Court Order granting Respondent's objection to Petitioner's First Set of Requests for Production of Documents and Things to Respondent, and for such other and further Orders as the Court deems just and proper.

COULTER GOLDBERGER, LLC

/s/ Elliott I. Goldberger

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served by electronic filing and electronic mail, pursuant to Rule 103.08, this 22nd day of December 2023 to all attorneys of record.

/s/ Elliott I. Goldberger

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