

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Shannon Miller,  
Jen Banford, and  
Annette Wiles,

Case No. 15-cv-3740 (RHK/LIB)

Plaintiffs,

**PLAINTIFFS' MOTION TO COMPEL**

vs.

The Board of Regents of the  
University of Minnesota,

Defendant.

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Plaintiffs Shannon Miller, Jen Banford, and Annette Wiles (“Plaintiffs”) respectfully move this Court for an Order: (1) compelling Defendant to produce all relevant and non-privileged documents responsive to Plaintiffs’ Requests for Production Nos. 5-7, 9, 10, and 19-20; (2) compelling Defendant to produce all relevant and non-privileged information responsive to Plaintiffs’ Interrogatory No. 4; (3) compelling Defendant to confirm, for all discovery requests, that a complete set of relevant and non-responsive documents and information has been produced in this matter; (4) compelling Defendant to produce a privilege log; and (5) awarding Plaintiffs their reasonable costs and attorneys’ fees associated with bringing this motion.

This Motion is made and based upon Fed. R. Civ. P. 33 and 37, the attached memorandum of law, affidavit and exhibits, as well as the records herein and arguments of counsel.

