

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. WMN 05 CV 1297
	)	
JOHN BAPTIST KOTMAIR, JR., et al.,	)	
	)	
Defendants.	)	

**UNITED STATES' MOTION TO COMPEL DEFENDANTS' DISCOVERY RESPONSES**

The United States served interrogatories and requests for production of documents upon defendants John Baptist Kotmair, Jr. and Save-A-Patriot Fellowship (SAPF). With few exceptions, defendants refused to answer the United States' requests based on groundless objections. They also failed to verify their responses to the interrogatories. Pursuant to L.R. 104.7, both the undersigned and Attorney Anne Graham has conferred in good faith with both Kotmair and counsel for SAPF, George Harp, regarding these matters. They were steadfast, however, in their refusal to answer certain of the United States' discovery requests. The Court should enter an order compelling them to answer these discovery requests in full.

Kotmair filed and served a reply to the Notice of Service of Motion to Compel on January 17, 2006.<sup>1</sup> SAPF filed and served an untimely reply to the Notice of Service of Motion to Compel on February 1, 2006.<sup>2</sup> The United States served and filed a response to Kotmair's reply

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<sup>1</sup> Docket No. 17.

<sup>2</sup> Docket No. 21.

on January 30, 2006.<sup>3</sup> The United States served and filed a response to Kotmair's reply on February 8, 2006.<sup>4</sup>

In support of this motion, the United States submitted a memorandum of law supporting its motion to compel,<sup>5</sup> and is concurrently filing a Certificate of Conference pursuant to L.R. 104.7 with this motion.

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<sup>3</sup> Docket No. 20.

<sup>4</sup> Docket No. 22.

<sup>5</sup> Docket No. 16.

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the foregoing UNITED STATES' MOTION TO COMPEL has been made upon the following by depositing a copy in the United States mail, postage prepaid, this 25<sup>th</sup> day of April, 2006.

John Baptist Kotmair, Jr.  
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