

STATE OF MINNESOTA
COUNTY OF MARTIN

IN DISTRICT COURT
FAMILY DIVISION
FIFTH JUDICIAL DISTRICT
Dissolution with Children
Court File No. 46-FA-19-1151

In Re the Marriage of:

Linda Rae Olson,

Petitioner,

**NOTICE OF MOTION AND
MOTION TO COMPEL**

and

Stephen Daniel Olson,

Respondent.

**TO: RESPONDENT ABOVE-NAMED, BY AND THROUGH HIS ATTORNEY,
MICHAEL P. EDMAN OF EDMAN & EDMAN LAW OFFICE:**

YOU WILL PLEASE TAKE NOTICE that on November 2, 2020 at 1:30 p.m., or as soon thereafter as counsel can be heard before the Honorable Michael D. Trushenski at the Martin County Courthouse, in the City of Fairmont, State of Minnesota, Petitioner, through her counsel, will move the Court for an Order as follows:

1. Compelling Respondent to fully and completely answer Petitioner's Interrogatories submitted under Rule 33 of the Minnesota Rules of Civil Procedure and served upon Respondent via US Mail on March 23, 2020;
2. Compelling Respondent to fully and completely answer Petitioner's Requests for Production of Documents submitted under Rule 34 of the Minnesota Rules of Civil Procedure and served upon Respondent via US Mail on March 23, 2020;

3. For an order awarding attorney's fees and reasonable expenses associated with having to bring this motion in the amount of \$2022.50 pursuant to Minnesota Rules of Civil Procedure 37.01; and

4. For such other and further relief as the Court deems just, fair and equitable.

This Motion is based upon Rule 37 of the Minnesota Rules of Civil Procedure. Specifically, Rule 37.01(b) and is based upon the Affidavits submitted herewith, the arguments of counsel, and all the files, records and proceedings herein.

Responsive pleadings shall be served and mailed to or filed with the court administrator no later than seven (7) days prior to the scheduling hearing. The court may, in its discretion, disregard any responsive pleadings served or filed with the court administrator less than seven (7) days prior to such hearing in ruling on the motion or matter in question.

Dated: October 12, 2020

**KOHLMEYER HAGEN,
LAW OFFICE CHTD.**

By: */s/ David A. Samb*

David A. Samb

Attorney for Petitioner

Attorney Reg. # 399395

150 St. Andrews Court, Suite 110

Mankato, Minnesota 56001

507-625-5000

dsamb@khmnlaw.com