

**New York Supreme Court, Albany County**

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Gerard Aprea,	)	CASE NO. 7215-11
John Vidurek,	)	
	)	HON Judge <i>Joseph C. Teresi</i>
Plaintiffs;	)	
	)	
- vs -	)	
	)	
NEW YORK STATE BOARD OF ELECTIONS,	)	<b>MOTION TO COMPEL</b>
DUTCHESS COUNTY BOARD OF ELECTIONS,	)	<b>COMBINED DISCOVERY</b>
GREEN COUNTY BOARD OF ELECTIONS,	)	<b>PRODUCTIONS - INTERROGATORIES</b>
Defendants.	)	<b>&amp; ADMISSIONS</b>

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**PLAINTIFFS WHO ARE "NOT ATTORNEYS" PURSUANT TO THE RULE CPLR 3120** moves this honorable court for an order to compel the NYSBOE (defendant) to produce documents and things preciously requested by the plaintiff and states;

1. That on the 12th of December 2011 plaintiff served the defendant with the first request for combined discovery (productions, interrogatories, admissions).
2. The defendant then failed and refused to respond to plaintiffs request as required by rule
3. Pursuant to the rule CPLR 3120 the defendant had 20 days to respond and more than 20 days have elapsed.

4. Plaintiff is entitled to entry of an order compelling the requested production as a matter of law.

**WHEREFORE:** plaintiffs, move the court to enter an order compelling the defendant to produce the requested documents and things.

All rights reserved,

**DATE:** The twelfth day of the first month of the Year of Our Lord two thousand twelve and the two hundred thirty-sixth Year of Our Independence.

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John Vidurek, Sui Juris, unrepresented  
Lead Plaintiff

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