

**IN THE CIRCUIT COURT IN THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA  
CIVIL DIVISION**

CLAY G. COLSON,

Plaintiff,

vs.

Case No.: 21-005793-CI

THE CITY OF TARPON SPRINGS, FLORIDA,

Defendant.

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**DEFENDANT CITY OF TARPON SPRINGS'  
MOTION TO COMPEL DISCOVERY RESPONSES**

Defendant, CITY OF TARPON SPRINGS (the "City"), by and through undersigned counsel and pursuant to Fla. R. Civ. P. 1.380, requests this Honorable Court enter an order compelling Plaintiff, CLAY G. COLSON, to provide responses to the City's First Request to Produce and answers to the City's First Set of Interrogatories, and as grounds therefore states:

1. On March 9, 2022, the City served Plaintiff with the City's First Request to Produce (Ex. A) and City's First Set of Interrogatories (Ex. B).
2. Responses to same were due on or before April 8, 2022.
3. On April 18, 2022, the City sent Plaintiff a letter requesting the responses be provided on or before April 29, 2022. (Ex. C).
4. Plaintiff has failed to respond to the City's First Request to Produce and First Set of Interrogatories.
5. Plaintiff has not filed a request for an extension of time to respond to the City's discovery requests.

6. The City certifies that a good faith effort was made to resolve the discovery disputes and brings this motion without the purpose of harassment or delay.

WHEREFORE, Defendant, CITY OF TARPON SPRINGS, requests this Court enter an order compelling Plaintiff CLAY G. COLSON to provide responses to the City's First Request to Produce and answer the City's First Set of Interrogatories within fifteen (15) days of the entering of the order, and grant any other relief as the Court may deem appropriate. The City seeks reasonable costs, including attorney's fees, which were incurred by the City in the bringing of this Motion. Rule 1.380(a)(4), Fla. R. Civ. P.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of May, 2022 a true and correct copy of the foregoing was filed with the Clerk of the Circuit Court using the ECF system and sent via U.S. Regular mail to Clay G. Colson, Pro Se, 4318 Joy Drive, Land O Lakes, FL 34637.

/s/ Jay Daigneault  
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