



Allegheny County Court of Common Pleas

Fill out form and save a copy to email to the Court with your Motion.

The filename of the form should be the GD number of your case.

Remote Discovery

Motion Form

Please fill out this form in its entirety.

Motions with incomplete/no form WILL NOT BE HEARD Completed forms MUST accompany ALL Discovery Motions. All parties must be CC'd. Completed forms and accompanying motions must be emailed to:

civildiscmotions@alleghenycourts.us

You will be assigned a date and time via email.

Has this Matter ON or EVER BEEN ON a Trial List? Yes No

If "Yes" then the Motion **MUST** go to Calendar Control Judge

GD Number:

Contested Uncontested

(If you are unsure select CONTESTED)

Plaintiff(s),
v.

Motion Title (i.e. Motion to Compel):

Defendant(s).

Plaintiff/Counsel Contact Info*:

Louis J. Kroeck IV, Esquire
LJK LAW, PLLC
Email: Lou@ljk-law.com
Phone: 1 (412) 712-7605

Notes/Additional Party Contact Information*:

See Attached Counsel List

Defendant/Counsel Contact Info*:

See Attached Counsel List

APPROPRIATE SERVICE MUST BE PROVIDED ACCORDING TO PROCEDURES LOCATED IN THE DISCOVERY SECTION OF THE CIVIL DIVISION WEBSITE

***Contact information must include an email address as well as a personal contact number for the party.**
If a party wishes to use their firm contact information on a filing in lieu of personal contact information. Personal contact information MUST be placed in the email to the Court.

COUNSEL LIST CONTESTED DISCOVERY MOTION COVER SHEET CONTINUED

Joseph J. Pass, Esquire
Email: jjp@jpilaw.com

Patricia M. Shea, Esquire
Email: pats@cwa-union.org

Barbara L. Camens, Esquire
Email: bcamens@barrcamens.com

Alidz Oshagan, Esquire
Email: aoshagan@wwdlaw.com

Robert E. Paul, Esquire
Email: rpaul@robertepaul.com

Ryan A. Hancock, Esquire
Email: rhancock@wwdlaw.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

MICHAEL ELK,

CIVIL DIVISION

Plaintiff,

ELECTRONICALLY FILED

vs.

Case No.: GD-21-007428

Pleading type:

ZACK LIGHTNING TANNER,
PITTSBURGH NEWSGUILD,
NEWSGUILD CWA, JON SCHLEUSS,
FATIMA HUSSEIN, and STEVE COOK,

**PLAINTIFF'S MOTION TO COMPEL
ANSWERS AND RESPONSES TO
DISCOVERY**

Defendants.

Filed on Behalf of Plaintiff:

Mike Elk

Counsel of Record for this Party:

Louis J. Kroeck IV, ESQ #210045

LJK LAW PLLC
1200 Sarah Street
Pittsburgh, PA 15203
Phone: 1 (412) 712-7605
Lou@ljk-law.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

MICHAEL ELK,

CIVIL DIVISION

Plaintiff,

Case No. GD-21-007428

vs.

ZACK LIGHTNING TANNER,
PITTSBURGH NEWSGUILD,
NEWSGUILD CWA, JON SCHLEUSS,
FATIMA HUSSEIN, and STEVE COOK,

Defendants.

“JURY TRIAL DEMANDED”

PLAINTIFF’S MOTION TO COMPEL DISCOVERY

AND NOW COMES, Plaintiff and through the undersigned attorneys and files the following Motion to Compel Discovery:

1. On March 24, 2023, Plaintiff served interrogatories and requests for production directed to each Defendant. A copy of the certificate of service is attached hereto as Exhibit 1.
2. Defendants failed to respond to those requests in a timely manner and on June 1, 2023 requested an extension to respond until June 16, 2023 and Plaintiff obliged.
3. On June 30, 2023 and, again, on July 6, 2023, Plaintiff inquired into when responses would be forthcoming, counsel has not responded.
4. To date not one defendant has responded to discovery requests.
5. Responses are now almost four (4) months overdue even after an extension was provided.
6. Defendant’s failure to respond to Plaintiff’s requests is prejudicial, is hindering Plaintiff’s ability to prosecute this case and violates Pennsylvania Rules of Civil Discovery Procedures.

7. The behavior of the Defendants is unprofessional and intended to cause delay and hardship.

8. Plaintiff respectfully requests that these materials be produced within 10 days.

WHEREFORE, plaintiff requests this Honorable Court grant the within Motion to Compel Discovery and provide plaintiff with full and complete answers to his requests within ten (10) days or suffer sanctions.

Respectfully Submitted,

LJK LAW, PLLC:

/s/ Louis J. Kroeck, IV

Louis J. Kroeck, IV, Esquire

PA ID #: 210045

1200 Sarah Street

Pittsburgh, PA 15203

Phone: 1 (412) 712-7605

Email: Lou@ljk-law.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

MICHAEL ELK,

CIVIL DIVISION

Plaintiff,

Case No. GD-21-007428

vs.

ZACK LIGHTNING TANNER,
PITTSBURGH NEWSGUILD,
NEWSGUILD CWA, JON SCHLEUSS,
FATIMA HUSSEIN, and STEVE COOK,

Defendants.

“JURY TRIAL DEMANDED”

ORDER OF COURT

AND NOW TO WIT, this ___ day of _____, 2023, upon consideration of Plaintiffs **MOTION TO COMPEL DISCOVERY**, it is hereby **ORDERED, ADJUDGED** and **DECREED**, that said motion is granted and the above mentioned Defendants are to provide full and complete responses to Plaintiff’s discovery requests within ten (10) days of the date of this Order or suffer sanctions.

BY THE COURT:

Philip A. Ignelzi, Judge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Motion to Compel was served by electronic mail and where requested by first class mail on this day of _____ day of July, 2023 to the following:

Joseph J. Pass, Esquire
Email: jjp@jpilaw.com

Patricia M. Shea, Esquire
Email: pats@cwa-union.org

Barbara L. Camens, Esquire
Email: bcamens@barrcamens.com

Alidz Oshagan, Esquire
Email: aoshagan@wwdlaw.com

Robert E. Paul, Esquire
Email: rpaul@robertepaul.com

Ryan A. Hancock, Esquire
Email: rhancock@wwdlaw.com

LJK LAW PLLC

/s/ Louis J. Kroeck, IV
Louis J. Kroeck IV, Esquire
Attorney for Plaintiff, Mike Elk

CERTIFICATE OF COMPLIANCE

I hereby further certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania that requires filing confidential information and documents separately from non-confidential information and documents.

LJK LAW PLLC

/s/ Louis J. Kroeck, IV
Louis J. Kroeck IV, Esquire
Attorney for Plaintiff, Mike Elk.