

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
EASTERN DIVISION

| | | |
|---------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | Civil Action No. C94-1023 |
| |) | |
| v. |) | Hon. Michael J. Melloy |
| |) | |
| MERCY HEALTH SERVICES and |) | |
| FINLEY TRI-STATES HEALTH |) | Expedited Relief Requested |
| GROUP, INC., |) | |
| |) | Oral Argument Requested |
| Defendants. |) | |
| |) | |

**United States' Motion to
Compel Answers to Interrogatories**

Pursuant to Fed. R. Civ. P. 37(a), the Government moves this Court to issue an order compelling defendants Mercy Health Services and Finley Tri-States Health Group, Inc. to serve upon the Government full and complete answers to Interrogatories 21(iii) and 31 of the United States' Second Request for Answers to Interrogatories and Interrogatory 1 of the United States' Third Request for Answers to Interrogatories (which consisted only of this one interrogatory). The Government requests expedited treatment of this motion because this case has been set on an expedited schedule. The complaint was filed on June 10 and trial is on September 12 (discovery ends on September 2).

The Government served Interrogatories 21(iii) and 31 upon the defendants on July 1. The Government served its Third Request for

Answers to Interrogatories on the defendants on July 7. Defendants' answers to all three are woefully inadequate. Defendants refuse to answer Interrogatory 31. Their answers to Interrogatories 21(iii) and 1 are almost entirely deficient. For the reasons stated in the accompanying memorandum, the Court should issue an Order compelling the defendants to give full and complete answers.

The United States requests both expedited treatment under Local Rule 14(m) and oral argument of this Motion.

DATED: August 4, 1994

Respectfully submitted,

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