

Daniel and Valery O'Connell-PRO SE  
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**MONTANA SIXTH JUDICIAL DISTRICT COURT, PARK COUNTY**

Daniel K. O'Connell (a Director of the	)	
Glastonbury Landowners Association	)	Cause No. DV-2011-114
Incorporated), & Valery A. O'Connell	)	
	)	<b>PLAINTIFFS</b>
Plaintiff(s),	)	<b>NOTICE OF DELAY OF DISCOVERY</b>
v.	)	<b>&amp; ORAL DEPOSITION</b>
"Glastonbury Board of Directors	)	
& GLA Glastonbury Landowners Assoc. Inc.)	)	
Defendant(s)	)	
_____	)	

Plaintiffs, Dan and Val O'Connell, hereby file notice of delay of discovery, and notice of further discovery by oral deposition on June 13, 2014 per M.R.Civ. P., 45 & 30.

**Factual Brief**

Plaintiffs contend for good cause that discovery has being delayed since fall 2013 to give Defendants more time to comply with issues in dispute since seven GLA Directors have been removed or resigned; also for proposed election (Nov. 12, 2014) of proposed amendments to the GLA Governing Documents that would settle some issues in dispute before trial; and also for medical reasons that took Plaintiff(s) Daniel out of state for several months for physical therapy.

This is also notice of discovery by subpoena to compel an Oral Deposition and documentation from Defendant and GLA President, Alyssa Allen on June 13, 2014 per M.R.Civ. P., 45 & 30 at County Court House lower room (across from Planning Dept.).

Submitted this 23rd day of May, 2014.

By: Daniel K. O'Connell Daniel K. O'Connell

By: Valery A. O'Connell Valery A. O'Connell

Certificate of Service

The following parties were serviced the same day the forgoing documents by Plaintiff via first class mail postage prepaid to the following addresses:

GLA Attorney(s) of record:  
Alanah Griffith  
1184 N. 15th St. Suite #4  
Bozeman, Mt. 59715

Brown Law Firm, P.C.  
315 N. 24th St. (PO Drawer 849)  
Billings, MT. 59103-0849

Hon. Judge David Cybulski  
573 Shippe Canyon Rd.  
Plentywood, Mt. 59254

By: Valery A. O'Connell Valery A. O'Connell