Daniel & Val O'Connell P.O. Box 77 Emigrant, Mt. 59027 406-577-6339

MONTANA SIXTH JUDICIAL DISTRICT COURT, PARK COUNTY

Daniel K. O'Connell & Valery A. O'Connell & on behalf of themselves as members of Glastonbury Landowners Association.)))
Plaintiff(s),))) Cause No. DV–11–114
V.)
Glastonbury Landowners Association, Inc. & current GLA Board of Directors))
Defendant(s)	,

PLAINTIFFS' PRE-DISCOVERY DISCLOSURE NOTICE

Per M.R.Civ. P., Rule 4 & 6, Plaintiffs hereby give pre-discovery disclosure notice of intent to conduct further discovery by requesting any or all Defendants' admissions and interrogatories pursuant to M.R.Civ. P., Rules 33 & 36. Such written requests for admissions and interrogatories will be forthcoming within a week or two.

Also, Plaintiff's hereby give pre-discovery disclosure notice of intent to conduct further discovery by requesting oral depositions of Alyssa Allen and Janet Naclerio on October 14th, 2014 (10AM-2PM) at Emigrant Hall. This notice will be mailed and emailed to opposing council for coordination purposes. If Defendants' or opposing council do not respond back via email or otherwise by September 19th, then Plaintiffs will take this as agreement for such discovery and depositions date.

Submitted this 10th day of September, 2014,

By: Daniel O'Connell

By: Maly O'Connell

Valery O'Connell

Certificate of Service

A true and correct copy of forgoing document(s) were sent to the following parties via first class mail on this same day to:

Sixth Judicial District Clerk of Court 414 E. Callender St. Livingston, Mt. 59047

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

Valery O'Connell

Alanah Griffith 26 E. Mendenhall Bozeman, Mt. 59715

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