

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: THE FORMER MARRIAGE OF

CASE NO: 501971DR004137XXDIFD

WILLIAM A. CABANA,
Petitioner/Former Husband,

FAMILY DIVISION

and

SHARON ANN MAYO f/k/a
SHARON ANN CABANA
Respondent/Former Wife.

**FORMER WIFE'S EX-PARTE MOTION TO COMPEL DISCOVERY
PURSUANT TO ADMINISTRATIVE ORDER NO. 5.011-9/92, SUBSECTION B**

The Former Wife, SHARON ANN MAYO, moves the court for an ex-parte order compelling discovery pursuant to administrative order No. 5.011-9/92, subsection B, and affirmatively alleges:

1. On September 16, 2005, the Former Wife served the Former Husband, WILLIAM A. CABANA, with Interrogatories for Modification Proceedings and her Second Request to Produce.
2. The Former Husband, WILLIAM A. CABANA, was required answer the Interrogatories for Modification Proceedings and to produce documents responsive to the Second Request to Produce within 35 days of the date of service.
3. The deadline for the Former Husband to answer the Interrogatories for Modification Proceedings and respond to the Second Request to Produce was October 21, 2005.
4. There has been a complete failure to answer the Interrogatories for Modification Proceedings, and respond to the Second Request to Produce.

5. In compliance with the administrative order the undersigned attorney is submitting the proposed order and addressed, stamped envelopes for the court's consideration.

6. The Former Wife requests her attorney's fees and costs expended in the preparation of this motion and proposed order as such expenses were necessitated solely due to the negligence of the Former Husband.

WHEREFORE, the Former Wife respectfully requests that this court enter its ex-parte order compelling the Former Husband to answer the standard family law interrogatories for modification proceedings and produce the requested documents within ten (10) days of the signing of the order and reserving jurisdiction for an award of attorney's fees and costs, if any.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. Mail to William A. Cabana, 1050 Capri Isles Blvd., #F105, Venice, FL 34292 on this 17th day of November, 2005.

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By: 
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