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September 26, 2003

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RE: *Marcia Rhodes, et al. v. Carlo Zalewski, et al.*
Norfolk Superior Court – Civil Action No. 02-01159A

Dear Counsel:

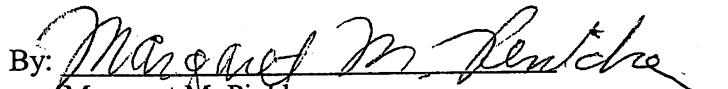
Pursuant to Superior Court Rule 9A(a), enclosed please find the following document, which, in accordance with that Rule, has not yet been filed with the Court:

1. Plaintiff Marcia Rhodes' Motion to Compel Defendants Carlo Zalewski and Driver Logistic Services, Inc. to Produce Documents and Interrogatory Responses, with Exhibits A-B.

Please be advised that in the event you intend to oppose this motion, under Superior Court Rule 9A(b) you are required to serve on this office an original and a copy of the opposition and the other documents which you intend to submit in accordance with Superior Court 9A(a)(2) within the times therein provided.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP

By: 
Margaret M. Pinkham

MMP/rsg
Enc.

cc: Marcia Rhodes
M. Frederick Pritzker, Esq.

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3. Mrs. Rhodes served her First Set of Interrogatories on Defendant Zalewski in June, 2003. See Exhibit A. The answers were due on August 7, 2003. By letter dated September 5, 2003, counsel for the plaintiff requested that the responses be provided by September 15, 2003, and counsel for the defendant represented that responses would be provided by September 25, 2003. Zalewski has not responded, and discovery closes on September 30, 2003.

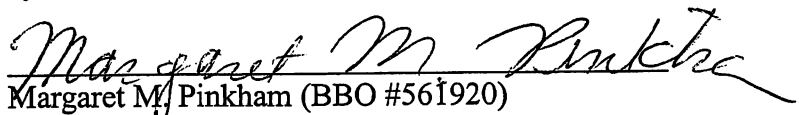
4. Mrs. Rhodes served her Second Set of Interrogatories on Defendant Driver Logistic Services, Inc. in June, 2003. See Exhibit B. The answers were due on August 7, 2003. By letter dated September 5, 2003, counsel for the plaintiff requested that the responses be provided by September 15, 2003, and counsel for the defendant represented that responses would be provided by September 25, 2003. Driver Logistics has not responded, and discovery closes on September 30, 2003.

WHEREFORE, the plaintiff Marcia Rhodes respectfully requests that the Court order the defendants Zalewski and Driver Logistic Services, Inc. to answer the pending interrogatories and produce all responsive documents as no objections have been raised, and to order the defendants to pay Mrs. Rhodes' costs for this motion.

Respectfully submitted,

MARCIA RHODES,

By her attorneys,



Margaret M. Pinkham (BBO #561920)

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DATED: September 26, 2003

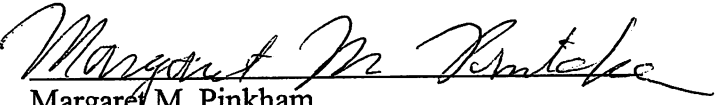
CERTIFICATE OF SERVICE

I, Margaret M. Pinkham, counsel for the plaintiffs, hereby certify that I have this 26th day of September, 2003 served a copy of the foregoing Plaintiff Marcia Rhodes' Motion To Compel Defendants Carlo Zalewski And Driver Logistic Services, Inc. To Produce Documents And Interrogatory Responses upon all counsel of record by mailing a copy of same by first-class mail, postage pre-paid, to:

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