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U.S. DISTRICT COURT
DISTRICT OF MASS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANNE ANDERSON, et al,)
)
 Plaintiffs)
) Civil Action
v.) ~~ABSTRACTED~~
) No. 82-1672-S
CRYOVAC, INC., et al,)
)
 Defendants)

PLAINTIFFS' MOTION FOR ORDER TO
COMPEL FURTHER ANSWERS TO
INTERROGATORIES

The plaintiffs, Anne Anderson, et al, pursuant to Fed. R. Civ. Pro. 37(a)(2) move this court to compel the defendant Beatrice Foods Company ("Beatrice") to further answer plaintiffs' First Set of Interrogatories Nos. 40-42 and Second Set of Interrogatories Nos. 18, 36-90, 93 and 94.

The Plaintiffs assign as reasons the following:

1. The plaintiffs served interrogatories on the defendant, Beatrice on October 7, 1982 and November 4, 1982.

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2. The defendant filed answers to these interrogatories on April 14, 1983. The defendant objected to Interrogatories, First Set, Nos. 40-42 and Interrogatories, Second Set, Nos. 36-90, 93 and 94, as well as other interrogatories, alleging the interrogatories sought irrelevant information which would not lead to the discovery of admissible evidence. Beatrice also claims a work product and/or attorney/client privilege in refusing to answer Interrogatories, First Set, Nos. 40-42, and provided inconsistent answers to Interrogatories, Second Set Nos. 16 and 18.

3. The defendant's objections and responses to the interrogatories are inappropriate and wrongly characterize the information sought. Plaintiffs' inquiries are clearly relevant, probative and germane to the issue of whether Beatrice's tannery operations and waste disposal practices led to the dumping of wastes on the Riley property adjacent to the tannery and/or the contamination of the groundwater serving Wells G & H. The requested information is necessary to continue and achieve meaningful pre-trial preparation. Plaintiffs hereby submit a memorandum in support of their motion.

Wherefore, the plaintiffs request this court enter an order compelling full and adequate answers to the above-enumerated interrogatories within thirty (30) days of the order.

Dated: February 7, 1985

Respectfully submitted,



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