

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF  
MASSACHUSETTS

ANNE ANDERSON et al.,

Plaintiffs

v.

BEATRICE FOODS CO.,

Defendant

C. A. NO. 82 1672-S

*Denied 7/1/89 Kutter for Anderson*

**FILED**

PLAINTIFFS' MOTION FOR DISCOVERY

Plaintiffs hereby move for an order allowing:


1. Depositions of the persons most knowledgeable concerning the location and nature of any and all documents relating to the litigation requested but not produced or not searched for by the Beatrice or the Riley interests.

2. The production of any documents identified in number one.

3. Upon reasonable notice and for a reasonable time, to conduct inspection, photography and sampling of the defendant's property in Woburn, both the Tannery and the 15 Acres.

DATED: July 14, 1989

Respectfully submitted  
by their attorney,

  
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Jan Richard Schlichtmann  
Schlichtmann, Conway, Crowley & Hugo  
171 Milk Street  
Boston, MA 02109

SO ORDERED:

*Filed in open Court 7-14-89*

*588*