

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MASSACHUSETTS

ANNE ANDERSON, et al,
 Plaintiffs
 v.
 CRYOVAC, INC., et al
 Defendants

Dec 9 1982
 U.S. DISTRICT COURT
 Civil Actions
 No. 82-1672-S
 DOCKETED

PLAINTIFFS' FIRST MOTION TO COMPEL
 ANSWERS TO INTERROGATORIES, MOTION FOR A
 PROTECTIVE ORDER AND REQUEST FOR AN EXPEDITED HEARING
 AND IN OPPOSITION TO MOTION BY DEFENDANT W. R. GRACE & CO.
 FOR PROTECTIVE ORDER AND TO STRIKE THE COMPLAINT AND
 AMENDED COMPLAINT AND DISMISS THE ACTION

Pursuant to the Federal Rules of Civil Procedure, Plaintiffs oppose Defendants' Motion for a Protective Order served November 19, 1982, and its Motion to Strike pursuant to Rule 11 filed November 8, 1982. In addition, plaintiffs move this Court to:

1. Compel Defendant W.R. Grace & Co. to answer all of Plaintiffs' First Set of Interrogatories for which the sole basis for refusal to answer is the pendency of W.R. Grace's Rule 11 Motion.

2. Enter a protective order to stay all discovery initiated by W.R. Grace & Co., the sole purpose of which is to gather data allegedly relevant to W.R. Grace's Rule 11 Motion.

3. Grant an expedited hearing on these motions in order to facilitate their early resolution.

In support of these motions Plaintiffs state:

1. W.R. Grace's Rule 11 Motion is groundless, there being ample factual basis and expert opinion to believe that it is a source of the contamination which polluted the East Woburn water wells.

2. W.R. Grace's alleged reasons in support of its Rule 11 Motion and its discovery requests relate to matters totally unrelated to Rule 11 or this case.

3. W.R. Grace has no legitimate basis to further delay responding substantively to Plaintiffs' first request for discovery.


4. The ends of justice will be served by an early resolution of these motions and the prompt return to the merits of the case.

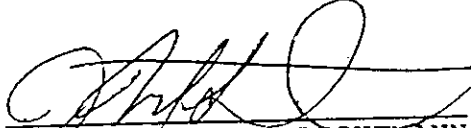
In further support of these motions Plaintiffs submit an attached Memorandum which also responds to the Rule 11 Motion

and the Motion for Protective Order filed by W. R. Grace.

Dated: December 3, 1982

Respectfully submitted,


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