

MOTION TO COMPEL AUTHORIZATIONS

Defendant, ***, by and through its attorneys, ***, moves this Honorable Court for an order to compel authorizations for the following reasons:

1. This matter involves Plaintiff's alleged ***.
2. Defendant has requested the records of *** through (service used, ie, RCS, etc.).
3. The records requested are pertinent to this matter, and are discoverable pursuant to MCR 2.302.
4. Plaintiff has failed to provide authorizations to release the records of ***.
5. It applies to discovery pursuant to MCR 2.302 and MCR2.314.
6. It has been more than twenty-eight (28) days since Plaintiff was requested to provide the authorizations.

WHEREFORE, Defendant respectfully request this Honorable Court grant its Motion, and compel Plaintiff to produce signed authorizations for the release of the records indicated above within seven days of the date of this hearing, or be prohibited from presenting evidence of Plaintiff's medical condition at the time of trial. Defendant further requests reasonable costs and attorney fees for having to file this Motion.