

January 13, 2021

VIA U.S. MAIL and EMAIL

John Smith, Esq.
The Law Office of John Smith
321 Law Lane
Cumming, Georgia 30040

RE: John Doe v. Jane Doe
Superior Court of Forsyth County
Civil Action File No.: 20CV-1234-1

Dear Mr. Smith,

Please accept this correspondence as a good faith attempt to resolve a potential discovery dispute in this case, pursuant to Uniform Superior Court Rule 6.4(b). You will recall that our office served *Defendant's First Notice to Produce and Request for Production of Documents to Plaintiff* on December 4, 2020. Thus, responses were due on January 3, 2021. To date we have not received Mr. Doe's responses to *Defendant's First Notice to Produce and Request for Production of Documents to Plaintiff*. At this time, Mr. Doe has waived all objections to same. See O.C.G.A. 9-11-33(a)(2), O.C.G.A. 9-11-6 (e), and Aetna Life Ins. Co. v. Greene, 116 Ga. App. 783, 159 S.E.2d 87 (1967) (stating that when timely objection is not made to discovery requests, right to object is waived).

Please have Mr. Doe produce his documents and responses on or before Monday, February 1, 2021 at 5:00 p.m., or I will have no choice but to file a Motion to Compel and seek attorney's fees and sanctions against Plaintiff.

Thank you for your time and attention to this matter. Please let us know of any questions you may have.

Sincerely,

PATTERSON MOORE BUTLER, LLC

JENNIFER D. PATTERSON
Attorney at Law

cc: Jane Doe (via e-mail only)