

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

Robert Anderson
D/B/A Detroit Tubs

Hon. Richard Caretti
Case No. 2023-001402-CB .

Plaintiff,

v.

Nick Doelle, Individually Modern Paint and Design
OCEAN ROCK BATH, LLC, Defendants,

_____ /

Robert Anderson
D/B/A Detroit Tubs
21537 Tanglewood
ST. Clair Shores, MI. 48082
586-344-3030

PLAINTIFF'S MOTION TO COMPEL
DEFENDANT TO ANSWER FIRST SET OF INTERROGATORIES

NOW COMES THE PLAINTIFF ROBERT ANDERSON'S PLAINTIFF'S MOTION
TO COMPEL

1. On 04/25/2023, The Plaintiff Robert Anderson Doing Business as DETROIT TUBS, FILED this case against Nick Doelle and his LLC Ocean Rock Bath. For Breach of Contract and tortious interference
2. Included in the filing was set of interrogatories from Plaintiff to Defendants
3. On 07/10/203, Defendants, Nick Doelle and Ocean Rock Bath through counsel filed motion for summary disposition and was ruled on by their court.

In conclusion, the Plaintiff requests the court to order the interrogatories be answered with in 14 days. And shall include the following items below.

SAMPLE FROM FIRST SET OF INTERROGATORIES

The Plaintiff further requests that the Defendant supply a list of Jobs sold by the defendant along where are you discloses the name and address of the customer the source of the lead the amount of the job and what exactly was done. That a of any and and all subcontractors used to do work from the date of his LLC, started through the date of this order” .

1. List of any and all jobs sold and or installed since 06/22/2022 by Ocean Rock Bath or Nick Doelle.
2. A full on complete list of any and all suppliers they used since 06/22/2022
3. List and and all and installers of any jobs since 06/22/2022
4. Provide sale amounts of each job
5. What form of payment was made
6. Full contact information for all customers, suppliers and installers
7. Provide copy of all contracts from any Supplier, Customer or Installer

8. How and where the leads were produced along with dates and times of any sales calls or installations since June 22, 2022
9. Provide a detailed list of any, and all entities used to advertise the Defendant's Friday, December 29, 2023 business used by the defendants
10. Provide Copies of any and all types of advertising used by the defendants
11. Please provide a copy and contact information for any samples you have used since June 22, 2022
12. A detailed list of any equipment/ vehicles/ trailers/ specialty equipment used in installations

Friday, December 29, 2023

A handwritten signature in cursive script, appearing to read "Robert Anderson".

ROBERT ANDERSON