

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JASON BOYCE,

Plaintiff,

-against-

BRUCE WEBER; JASON KANNER; SOUL
ARTIST MANAGEMENT; LITTLE BEAR
INC.,

Defendants.

Index No.: 160630/2017

**BRUCE WEBER’S AND LITTLE BEAR’S REQUEST FOR A
PRELIMINARY CONFERENCE AND DISCOVERY CONFERENCE**

Defendants Bruce Weber and Little Bear, Inc. respectfully submit this request for a Preliminary Conference and discovery conference, and state as follows:

1. This case involves false and defamatory allegations against Mr. Weber.
2. Mr. Weber and Little Bear seek to move this case through discovery and summary judgment, to a trial on the merits if any claims survive summary judgment.
3. To that end, Mr. Weber and Little Bear seek a Pretrial Conference prior to the currently scheduled February 20, 2019 conference.
4. In addition, pursuant to Rule 10 the Rules of the Justices of the Supreme Court, Civil Branch, New York County, Mr. Weber and Little Bear seek a discovery dispute conference prior to filing motions to compel responses to Mr. Weber’s and Little Bear’s Requests for Production and Interrogatories.
5. Motions to compel are necessary because: (i) on June 1, 2018, Plaintiff agreed to produce certain categories of documents but, to date, has not produced the promised documents, (ii) on December 3, 2018, Mr. Weber and Little Bear sent meet and confer letters to counsel for Plaintiff regarding Plaintiff’s deficient responses to: (a) Plaintiff’s First Request for Production, and (b) Plaintiff’s First Set of Interrogatories.

6. Mr. Weber and Little Bear requested a response to its meet and confer letters by December 10, 2018, but Plaintiff has ignored these letters.

7. Therefore, because Mr. Weber and Little Bear want to proceed expeditiously and judicial intervention is needed to compel Plaintiff to provide discovery, Mr. Weber and Little Bear respectfully request a Preliminary Conference and discovery dispute conference with the Court prior to the presently scheduled February 20, 2019 conference.

Dated: December 3, 2018

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