

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI**

NORWOOD 2020 LLC,)	
a Missouri limited liability company)	
)	
Plaintiff,)	Case No.: 21SL-CC01975
)	
vs.)	
)	Division: 41
)	
KEEP PUSHING, INC.,)	
a Missouri nonprofit corporation)	
<u>Serve:</u>)	
7659 Folk Ave.)	
St. Louis, MO. 63143)	
)	
and)	
)	
SHANA POOLE-JONES,)	
an individual)	
<u>Serve:</u>)	
4448 Enright Ave.)	
St. Louis, MO. 63108)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR EXPEDITED DISCOVERY

COMES NOW Plaintiff Norwood 2020 LLC (“Norwood”), by and through undersigned counsel, pursuant to Rules 57.01, 57.03, and 58.01 of the Missouri Rules of Civil Procedure, respectfully requests that this Court enter an Order expediting discovery in this matter. In support of its Motion, Norwood states as follows:

1. This lawsuit involves a claim by Norwood 2020 LLC (“Norwood” or “Plaintiff”) against Defendants Keep Pushing, Inc. (“Keep Pushing”) and its founder and CEO, Shana Poole-Jones (“Jones”) (collectively “Defendants”) for Defendants’ actions in trespassing onto Norwood’s property to knock on residents’ doors and provide to them

certain documents and information related to eviction protection.

2. Norwood has filed its Petition for Damages and Injunctive Relief (“Petition”), in which Norwood, among other things, seeks to enjoin Defendants from further trespass and interference with contractual relations, and other appropriate relief.

3. Norwood wishes to proceed as soon as possible with its request for injunctive relief and expedited discovery due to the ongoing harm caused by Defendants’ trespass and interference with contractual relations.

4. Expedited discovery is necessary so that Norwood may expeditiously determine the witnesses, documents, and facts that may be presented at the hearing for preliminary injunction.

5. Along with Plaintiff’s Petition and this Motion, Norwood intends to serve the following requests upon Defendants:

- a. Plaintiff’s First Set of Interrogatories to Defendant Keep Pushing;
- b. Plaintiff’s First Set of Interrogatories to Defendant Shana Poole-Jones;
- c. Plaintiff’s First Requests for Production of Documents to Defendant Keep Pushing;
- d. Plaintiff’s First Requests for Production of Documents to Defendant Shana Poole-Jones.

6. Mo. R. Civ. Pro. 57.01(c)(1), 57.03(a) and 58.01(c)(1), provide the Court may grant leave to shorten the deadlines for responding to discovery and permit depositions to be conducted prior to the expiration of thirty (30) days after service of summons and petition.

7. Plaintiff’s respective discovery requests to Defendants are limited in number and

narrowly tailored to promote the expeditious discovery of material facts essential to preparing for the preliminary injunction hearing.

WHEREFORE, Plaintiff Norwood 2020 LLC respectfully requests that this Court grant Plaintiff's Motion for Expedited Discovery, and Order that:

- (a) The time period within which Defendants must respond to written discovery be shortened to fourteen (14) days from the date of service;
- (b) Norwood be granted leave to take the deposition of Shana Poole-Jones prior to the expiration of thirty (30) days after service of summons of Plaintiff's Petition, but after the conclusion of written discovery; and
- (c) For other and further relief as the Court deems just and necessary.

Respectfully submitted,
REINKER, HAMILTON & FENLEY L.L.C.

/s/Randall J. Reinker
Randall J. Reinker, #36994
Molly E. Dougherty, #70944
Attorneys for Plaintiff
2016 S. Big Bend Blvd
St. Louis, Missouri 63117
(314) 333-4146; Facsimile: 754-2621
randall@rhflegal.com
molly@rhflegal.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was delivered to all attorneys of record via the Court's electronic filing system on this 14th of May 2021.

/s/ Matt Martin