

**IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 15-cv-20782-Martinez-Goodman

DENNIS MONTGOMERY,

Plaintiff,

v.

RISEN, ET AL.

Defendants.

**SUPPLEMENTAL NOTICE OF HEARING BEFORE
MAGISTRATE JUDGE JONATHAN GOODMAN**

Plaintiff, Dennis Montgomery, hereby gives notice that the issue of compelling Mr. Risen's answers to questions asked at his deposition, most notably regarding the 20,000 documents Defendants and their counsel received and reviewed from Michael Flynn, Plaintiff's former counsel, many of which contained attorney client privileged and work product information and communications, will be heard during the hearing that has been set before the Honorable Jonathan Goodman on Friday, August 21, 2015 at 3:30 p.m. E.D.T.

Pursuant to S.D. Fla. L. R. 7.1 (A)(3), Plaintiff hereby certifies in good faith that the parties met and conferred regarding this discovery dispute and a reasonable effort was made to resolve this issue however the parties were unable to reach an agreement.

Dated: August 17, 2015

Respectfully Submitted,

/s/ Larry Klayman
Larry Klayman, Esq.
FL Bar No. 246220
7050 W Palmetto Park Rd.

Suite 15-287
Boca Raton, FL 33433

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of August 2015, a true and correct copy of the foregoing was served via email and U.S. Mail upon the following:

Sanford Lewis Bohrer

Brian Toth

Holland & Knight, LLP

Suite 3000

701 Brickell Ave

Miami, FL 33131

Email: sbohrer@hklaw.com

Email: brian.toth@hklaw.com

Laura R. Handman

Micah Ratner

Davis Wright Tremaine LLP

1919 Pennsylvania Ave., N.W., Suite 800

Washington D.C. 20006-3401

Email: laurahandman@dwt.com

Email: MicahRatner@dwt.com

Attorneys for Defendants

/s/ Larry Klayman

Larry Klayman, Esq.