

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

TRINITY INDUSTRIES, INC. and THE)
TEXAS A&M UNIVERSITY SYSTEM,)

Plaintiffs,)

v.)

Civil Action No: 1:11cv937-CMH-TRJ

SPIG INDUSTRY, LLC, SPIG INDUSTRY,)
INC. and SELCO CONSTRUCTION)
SERVICES, INC.,)

Defendants.)

**DEFENDANTS SPIG INDUSTRY, LLC,
SPIG INDUSTRY, INC. AND SELCO CONSTRUCTION SERVICES, INC.’S
MOTION TO COMPEL ADEQUATE RESPONSES TO DEFENDANTS’
INTERROGATORY NOS. 56-60, 62-63, 65, 68, AND 73-74, AND
TO DEEM DEFENDANTS’ REQUEST FOR ADMISSION NOS. 91-93 ADMITTED**

Defendants SPIG Industry, LLC, SPIG Industry, Inc. and SELCO Construction Services, Inc. (collectively “Defendants”), pursuant to Federal Rules of Civil Procedure 26, 34, and 37, respectfully move this Court to issue an order compelling Plaintiffs Trinity Industries, Inc. and The Texas A&M University System (collectively “Plaintiffs”) to provide adequate responses to Defendants’ Interrogatory Nos. 56-60, 62-63, 65, 68, and 73-74, and to deem Defendants’ Requests for Admission Nos. 91-93 admitted. Defendants detail their support for this motion more fully in the accompanying memorandum, and request an expedited hearing.

Dated: August 17, 2012

/s/ Walter D. Kelley, Jr.

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Plaintiffs SPIG Industries, LLC, SPIG

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CERTIFICATE OF SERVICE

I certify that on August 17, 2012, a copy of the foregoing was filed electronically with the Clerk of Court using the ECF system which will send notification to the following ECF participants:

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