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# IN THE THIRD JUDICIAL DISTRICT COURT SUMMIT COUNTY, STATE OF UTAH

TERRY SANDERSON,	) REQUEST TO SUBMIT FOR
Plaintiff,	<ul><li>DECISION FOR DEFENDANT AND</li><li>COUNTERCLAIMANT MS.</li></ul>
v.	<ul><li>) PALTROW'S PRETRIAL MOTIONS</li><li>) (MILS 1-21)</li></ul>
GWYNETH PALTROW,	)
Defendant.	) REQUEST FOR ORAL ARGUMENT )
GWYNETH PALTROW,	<ul> <li>)</li> <li>) [CASE SUBJECT TO PROTECTIVE</li> <li>) ORDER DATED NOVEMBER 14,</li> <li>) 2019</li> </ul>
Counterclaim Plaintiff, v.	)
TERRY SANDERSON,	Case No. 190500048 Judge Kent R. Holmberg
Counterclaim Defendant.	Tier 3

Pursuant to Rule 7(g-h), Utah Rules of Civil Procedure, Defendant requests to submit for decision on her pretrial motions (Defendant's MILs 1-21). These motions have been fully briefed

and are ripe for this Court's decision. Defendant also respectfully requests oral argument on all contested motions. An email with a link to access courtesy copies of all briefing on Defendant's motions will be sent contemporaneously with this filing. An outline of the documents filed and their date of filling is outlined below.

## • Defendant's MILs 1-10

- Defendant's motion (712 D MIL No. 1-10 General Motions) was filed on January
   17, 2023;
- Plaintiff's opposition (Filed Privately by Plaintiff) was filed on February 6, 2023;
   and
- Defendant's reply (814 Reply in Support of D MIL 1-10) was filed on February 17, 2023.

## • Defendant's MIL 11

- Defendant's motion (716 D MIL No. 11 Re Reptile and Golden Rule Arguments)
   was filed on January 17, 2023;
- o Plaintiff's opposition (757 P Opp. to MIL 11) was filed on February 6, 2023; and
- Defendant's reply (819 Reply in Support of D MIL 11) was filed on February 17,
   2023.

# • Defendant's MIL 12

- Defendant's motion (718 D MIL No. 12 Rebuttal Witnesses) was filed on January
   17, 2023;
- Plaintiff's opposition (772 P. Opp. to D MIL No. 12) was filed on February 6,
   2023; and

 Defendant's reply (823 Reply in Support of D MIL No. 12) was filed on February 17, 2023.

#### • Defendant's MILs 13-15

- o Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
- Plaintiff's opposition (756 P. Opp. to D MILs 13-15) was filed on February 6,
   2023; and
- Defendant's reply (824 Reply in Support of D MILs 13-15) was filed on February 17, 2023.

#### • Defendant's MIL 16

- Defendant's motion (721 D MIL No. 16 Exclude Reference to Interactions
   Between Plaintiff and Defendants Counsel) was filed on January 17, 2023;
- Plaintiff's opposition (Filed Privately by Plaintiff) was filed on February 6, 2023;
   and
- Defendant's reply (828 Reply in Support of D MIL 16) was filed on February 17,
   2023.

# • Defendant's MIL 17

- o Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
- Plaintiff's opposition (Filed Privately by Plaintiff) was filed on February 6, 2023;
   and
- o Defendant's reply (Filed Privately by Defendant) was filed on February 17, 2023.

## • Defendant's MIL 18

- Defendant's motion (732 D MIL No. 18 To Exclude Untimely Expert
   Reevaluations and Opinions Based on Records Not Disclosed or Untimely
   Disclosed to Defendant) was filed on January 17, 2023;
- Plaintiff's opposition (770 P. Opp. to D MIL No. 18) was filed on February 6,
   2023; and
- Defendant's reply (840 Reply in Support of D MIL 18) was filed on February 17,
   2023.

#### • Defendant's MIL 19

- o Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
- Plaintiff's opposition (774 P Opp. to D MIL 19) was filed on February 6, 2023;
   and
- O Defendant's reply (841 Reply in Support of D MIL No. 19) was filed on February. 17, 2023

#### • Defendant's MIL 20

- o Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
- Plaintiff's opposition (766 P Opp. to D MIL No. 20) was filed on February 6,
   2023; and
- Defendant's reply (852 Reply in Support of D MIL 20) was filed on February 17,
   2023.

## • Defendant's MIL 21

o Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;

- Plaintiff's opposition (770 P Opp. to D MIL No. 21) was filed on February 6,
   2023; and
- Defendant's reply (853 Reply in Support of D MIL 21) was filed on February 17,
   2023.
- Defendant's Response to Plaintiff's Claim that Identified Confidential Material is Not Subject to the Protective Order (Contained in Each of Plaintiff's Opposition Memoranda. (D 880; and Exhibits 1-4 881-884.)

DATED this 23rd day of February, 2023.

**EPPERSON & OWENS, P.C.** 

/s/ Peter D. Jensen
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PETER D. JENSEN
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Counterclaimant Gwyneth Paltrow

# **CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of February, 2023, a true and correct copy of

# REQUEST TO SUBMIT FOR DECISION FOR DEFENDANT AND

# COUNTERCLAIMANT MS. PALTROW'S PRETRIAL MOTIONS (MILS 1-21) was

served and/or filed via the Court's e-filing and by e-mail transmission to counsel listed below.

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/	s/Dawne Adamson	L

 $\underline{G:} SWO \\ Sanderson v. \ Paltrow \\ PLEADINGS \ [PROTECTIVE \ ORDER \ IN PLACE] \\ TRIAL \ MOTIONS \\ Our \ MILs \\ Req. \ to \ Submit \ and \ Req. \ for \ \underline{Oral \ Arg. \ (Our \ MILs).docx}$