

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TIARA YACHTS, INC.,

Case No. 1:22-cv-603

Plaintiff/Counter-Defendant,

Honorable Robert J. Jonker

v.

Magistrate Judge Ray Kent

BLUE CROSS BLUE SHIELD OF MICHIGAN,

Defendant/Counter-Plaintiff.

PLAINTIFF/COUNTER-DEFENDANT'S MOTION TO COMPEL DISCOVERY

Plaintiff/Counter-Defendant Tiara Yachts, Inc. ("Plaintiff" or "Tiara Yachts"), through its attorneys, Varnum LLP, hereby moves this Court for an order compelling Defendant/Counter-Plaintiff Blue Cross Blue Shield of Michigan ("Defendant" or "BCBSM") to produce documents and discovery in response to Tiara Yachts' First Set of Requests for Production of Documents. In support of this Motion, Plaintiff submits and incorporates the accompanying brief by reference.

Accordingly, Plaintiff respectfully requests that the Court enter an Order (A) compelling BCBSM to, within fourteen (14) days, produce all relevant, non-privileged documents in BCBSM's care, custody, and control that are responsive to Tiara Yachts' discovery requests pursuant to Fed. R. Civ. P. 27(a)(3); (B) awarding Tiara Yachts' its costs and fees incurred in bringing this motion pursuant to Fed. R. Civ. P. 37(a)(5); and (C) granting Tiara Yachts any other relief this Court deems equitable and just.

Respectfully submitted,

VARNUM LLP

Attorneys for Tiara Yachts, Inc.

Dated: September 11, 2025

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