



mailed on July 20, 2010. As a result, Plaintiff's discovery requests are untimely.

10 days after the date which the clerk mails the Rule 307(d) notice. The Rule 307(d) notice was

10. Further, Rule 3-421 specifically prohibits any discovery being served more than

permitted since the case is currently stayed.

9. Here, the Subpoena should be quashed and the interrogatories should not be

that the scope of discovery be limited to certain matters . . . .” *Id*

some other event or proceeding has occurred . . . . (5) that certain matters not be inquired into or

until other designated discovery has been completed, a pretrial conference has taken place, or

or more of the following: (1) that the discovery not be had, (2) that the discovery not be had

person from annoyance, embarrassment, oppression or undue burden and expense, including one

whom discovery is sought, “the court may enter an order that justice requires to protect a party or

8. In ruling on a motion for a protective order under Rule 2-403 from a party from

the designated materials.

may file, within ten days after service of the subpoena, an objection to production of any or all of

deposition and to produce of documents may seek a protective order pursuant to Rule 2-403 or

7. Under Maryland Rule 2-510(f), a person served with a subpoena to attend a

been stayed pending the arbitration, thus any discovery is prohibited.

6. Both the Subpoena and the interrogatories are not permitted since the case has

Exhibits A and B.

January 5, 2010, respectively. A copy of the Subpoena and interrogatories are attached hereto as

served interrogatories and a Subpoena requesting documents on TDA on January 4, 2010 and

5. Despite the fact that the case is currently stayed pending the arbitration, Plaintiff

11. In addition, Rule 3-421 limits Plaintiff's discovery to 15 interrogatories and does not permit separate document requests. Plaintiff served 18 interrogatories on TDA and several requests for documents in the Subpoena. As a result, the Subpoena should be quashed and a protective order with respect to the interrogatories should be issued pursuant to Rule 3-421.

10. TDA does not waive any right to object to the substance of the specific requests contained in the Subpoena and interrogatories in the event that this Court lifts the stay.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14<sup>th</sup> day of January, 2011, a copy of the foregoing **MOTION TO QUASH SUBPOENA AND FOR PROTECTIVE ORDER** was mailed, first class, postage prepaid to:

Laurent J. Labrie, *pro se*  
 5 Pleasant Ridge Drive #205  
 Owings Mills, Maryland 21117

Donald E. English, Jr.  
