

VIRGINIA:

IN THE CIRCUIT COURT OF SURRY COUNTY

SANDRA L. WYATT, et al.)	
)	
Plaintiffs,)	Case No. CL06000069-00
)	
v.)	July 12, 2007
)	
SUSSEX SURRY, LLC, et al.)	Hearing: None Scheduled
)	
Defendants.)	

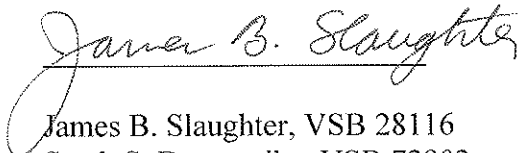
DEFENDANTS' MOTION TO COMPEL PLAINTIFFS'
EVIDENCE SUPPORTING CAUSATION

Defendants Synagro Central, Inc. and Sussex Surry, LLC jointly move this Court, pursuant to Virginia Supreme Court Rules 4:1, 4:12 and 4:13, to compel Plaintiffs to produce competent expert evidence supporting Plaintiffs' allegations that land application of biosolids caused Plaintiffs to suffer medical injuries and adverse health impacts. Defendants' Motion is supported by an accompanying memorandum of law. Defendants also have filed a proposed order setting forth the specific relief sought in this Motion.

Dated: July 12, 2007

Respectfully submitted,

SYNAGRO CENTRAL, INC.



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