

UNITED STATES OF AMERICA  
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF HEARINGS AND APPEALS

In the Matter of:

IMPRO SYNERGIES LLC,

Respondent.

24-JM-0383-CM-002

June 24, 2025

**ORDER GRANTING IN PART HUD’S MOTION TO COMPEL AND  
RESPONDENT’S MOTIONS TO EXTEND DISCOVERY**

This matter arises from a *Complaint for Civil Money Penalties* issued by the United States Department of Housing and Urban Development (“HUD”) seeking an award of civil money penalties against Impro Synergies LLC (“Respondent”) pursuant to 42 U.S.C. § 1437z-1 and 24 C.F.R. § 30.68.

On June 9, 2025, HUD filed *HUD’s Motion to Compel Production* (“HUD’s Motion”) requesting that Respondent be compelled to produce documents responsive to HUD’s discovery requests. Then, on June 11, 2025, HUD filed a *Notice of Discovery* noticing the depositions of Laura Pinero and Jeff Staley.

On June 16, 2025, Respondent filed its *Brief in Opposition to Government’s Notice of Deposition* requesting a protective order modifying the Government’s *Notice of Discovery*. On June 18, 2025, HUD filed the *Government’s Opposition to Impro’s Motion for Protective Order*. This Court subsequently denied the Respondent’s request for a protective order.

Respondent then filed a *Motion to Extend Discovery* requesting an extension of the discovery deadline until September 30, 2025, and an *Emergency Motion for Protective Order and Supplemental Motion to Extend Discovery* requesting a protective order modifying HUD’s deposition notice.

On June 23, 2025, the Court conducted a hearing regarding *HUD’s Motion*. Counsel for the parties presented their positions on the discovery being sought. Specifically, Respondent stated that it has produced documents since *HUD’s Motion* was filed, and further explained that its production is ongoing. As a result, Respondent again requested an extension of the discovery deadline.

Upon consideration, Respondent's *Motion to Extend Discovery*, and Respondent's *Emergency Motion for Protective Order and Supplemental Motion to Extend Discovery* are **GRANTED IN PART** and the deadline to complete discovery is extended to July 11, 2025.

It is **FURTHER ORDERED** that HUD's *Motion* is **GRANTED IN PART**. Respondent shall provide complete responses to the outstanding discovery requests by the close of discovery on July 11, 2025, with the following exceptions:

- (1) HUD shall limit the scope of Interrogatory 7 and provide the updated scope to Respondent by 2 p.m. Eastern Time on June 25, 2025; and
- (2) Respondent shall produce the written agreement between Respondent and Reno & Cavanaugh, PLLC, engaging the law firm to represent Respondent in this matter. However, Respondent can redact protected or privileged information.

The failure to comply with this order will result in the Court drawing negative inferences regarding information that was not produced; and Respondent will be precluded from presenting evidence at the hearing that would have been responsive to HUD's discovery requests.

It is **FURTHER ORDERED** that Respondent's request for a protective order is **DENIED**. However, to accommodate the witness, the parties will have additional time to take Mr. Staley's deposition, which must be completed on or before July 18, 2025.

**SO ORDERED,**



ALEXANDER FERNANDEZ-PONS  
CN = ALEXANDER FERNANDEZ-  
PONS C = US O = U.S. Government  
OU = Department of Housing and Urban  
Development, Office of the Secretary  
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Alexander Fernández-Pons  
Administrative Law Judge