

DOCKET NO.: HHD-CV-18-6088970-S : SUPERIOR COURT
 :
 GLORIA FARBER as Executor of the : JUDICIAL DISTRICT OF
 Estate of HILLIARD FARBER : HARTFORD
 :
 V. : AT HARTFORD
 :
 FORE GROUP, INC. and FOTIS DULOS : AUGUST 20, 2019

DEFENDANTS’ OBJECTION TO REQUESTS FOR PRODUCTION

The defendants, Fore Group, Inc. and Fotis Dulos (collectively, the “Defendants”), through their undersigned counsel, hereby object to certain of the requests for production included in the plaintiff’s *Notice of Deposition* dated August 1, 2019. First, pursuant to *Conn. Gen. Stat.* § 13-26 et seq., the request for production of documents requires a minimum of sixty (60) days for the production of same. Thus, all of the requests are invalid for the production of documents at an August 20, 2019 deposition, as they do not provide the time to produce documents set forth in the *Practice Book*. Second, certain of the requests are separately objectionable as follows:

4. Copies of individual financial statements submitted to the Court in the divorce action.

OBJECTION – The Defendants object to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. The Defendants further object to this request on the grounds that it seeks materials that are confidential and sealed in the divorce case.

5. Copies of all documentation from January 1, 2017 supporting any expense reimbursements of Fore Group to Fotis Dulos individually.

OBJECTION – The Defendants object to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

7. Copies of records reflecting the source of funds paid to criminal attorneys and private investigator.

OBJECTION – The Defendants object to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object to this request

on the grounds that it seeks documents covered by the attorney-client privilege and/or the work product doctrine.

8. Copies of any and all documents given to criminal attorneys related to your Fidelity retirement account.

OBJECTION – The Defendants object to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object to this request on the grounds that it seeks documents covered by the attorney-client privilege and/or the work product doctrine.

DEFENDANTS,
FORE GROUP, INC. AND
FOTIS DULOS



BY _____

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CERTIFICATION OF SERVICE

This shall certify that a copy of the foregoing was served on this 20th day of August, 2019

on the following:

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