

DOCKET NO.: HHD-CV-18-6088970-S : SUPERIOR COURT
GLORIA FARBER, as Executor of the : J.D. OF HARTFORD
Estate of HILLIARD FARBER
V. : AT HARTFORD
FORE GROUP, INC. and FOTIS DULOS : OCTOBER 17, 2019

**SUPPLEMENTAL MOTION IN SUPPORT OF
MOTION TO COMPEL RESPONSES RE: TROCONIS'S DEPOSITION**

While the plaintiff has not in fact been able to review the basis for the objection to the motion to compel deposition responses in regard to Michelle Troconis' deposition and while the plaintiff believes that it will be clear to the court that Ms. Troconis has abused the invocation of the Fifth Amendment privilege, the plaintiff will attempt to anticipate an argument that may be asserted by Attorney Bowman of behalf of Ms. Troconis.

It involves any testimony by Ms. Troconis in which she acknowledges her relationship with Fotis Dulos ("Dulos") due to concerns over potential conspiracy or aiding and abetting charges. However, a review of the Arrest Warrant Application ("Warrant") dated 9/3/19 makes it clear that Ms. Troconis spoke to State Police on numerous occasions, for example, in paragraph 10 investigators conducted an interview with Ms. Troconis with her attorney being present during which Ms. Troconis made statements concerning 5/24/19 (the date of Jennifer Farber Dulos' disappearance). Troconis

acknowledged the original alibi to be false and said she was unable to account for the whereabouts of Mr. Dulos in the morning on that date and Troconis acknowledged the handwritten notes in the Fore Group business office were fictitious and intended to be an alibi. In paragraph 21, Troconis stated that Dulos was in fact driving Gumienny's Toyota Tacoma truck. In paragraph 27, Troconis admitted not being truthful in two previous interviews with police; that she did not physically see Dulos upon her waking the morning of 5/24/19; that 4 Jefferson Crossing also serves as the headquarters for Dulos' company, the Fore Group. On page 34, that Ms. Troconis and Dulos had lunch together on 5/24/19 and that she observed Dulos cleaning a so-called coffee spill in Gumienny's 2001 Toyota Tacoma. Troconis told police she picked up Dulos at a car wash and then drove to meet Attorney Bowman. She further told investigators that after the meeting with Attorney Bowman, she drove back with Dulos to Farmington, stopped at the bank, went to the car wash at which she dropped off Dulos, and drove back to pick up her daughter. Troconis acknowledged that on 5/24/19 she was handed a stained towel by Dulos who was in the process of cleaning an alleged coffee spill and she placed that towel in one of the black bags.

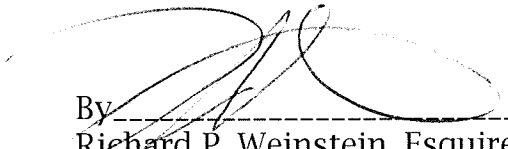
The aforesaid does not represent the totality of the statements made by Troconis to police, but certainly establishes that there is more than enough in

statements already made by Troconis to police to acknowledge a relationship existed between her and Dulos. At the deposition, the undersigned did not seek to inquire and will not seek to inquire about any of the events surrounding the disappearance of Jennifer Farber Dulos. The undersigned will not ask about any of the statements that Troconis made to police investigators. The undersigned will not ask questions concerning the obstruction charges or other possible charges that the deponent might face.

The plaintiff has every right to establish that Ms. Troconis had a frequent level of involvement in the affairs of the Fore Group and any benefits she received directly or indirectly from the Fore Group, i.e. the use of a motor vehicle; travel benefits, or other benefits all of which relate to the piercing claim directly and indirectly, and whether or not Fotis Dulos maintained true separate corporate identity for Fore Group and the sanctity of that corporation as opposed to using it as his personal piggy back.

For the reasons set forth in the plaintiff's original motion to compel as well as this supplement, notwithstanding the objection lodged by Attorney Bowman, plaintiff urges the court to grant plaintiff's motion. The plaintiff has been more than fair in trying to give due concern to Ms. Troconis' rights by lodging the deposition under seal in the first place.

PLAINTIFF,


By _____
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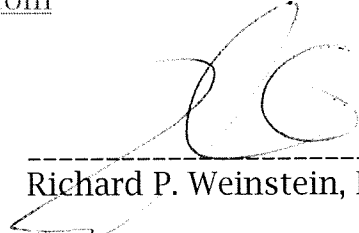
CERTIFICATION

This is to certify that on the 17th day of October, 2019, a copy of the foregoing was served upon:

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