

10/05/2017

Email To: Hon Federal Judge Shea  
 Hon. Judge Shea's Chambers  
 US Federal District Court.  
 450 Main St. Hartford, CT 06103

From: Mr. Hailee R. DeSouza  
 (Plaintiff, *pro-se*)  
 157 Terrace Dr.  
 Vernon, CT 06066  
 Tel: 860-871-9559  
 Email: [haileede@gmail.com](mailto:haileede@gmail.com)

Dear Hon. Federal Judge Shea:-

Ref: Submission Plaintiff's Discovery Disputes Summary Lists of Defendants Failure to Produce.

Ref. Case: Hailee R. DeSouza –Vs- Park West Apartments, Inc et al [ 3:15-CV-01668-MPS & 3:17-CV-00016-MPS]

Plaintiff (*Pro-se*) hereby submits its specific unresolved Discovery Disputes Items after parties have made good faith efforts in resolving the issues by discussions on 09/21/2017 for approximately two (2) hours as first step and in accordance with Hon, Judge Shea's established procedures in the above Federal Lawsuit.

**Plaintiff, pro-se Document Production Requests to defendant, Park West Apartments: -**

**Doc. Production Nos: 1 & 2:** the defendants only produced one (1) page document w/ Ref. Defs. Bates #001512 for The Community Builders only, and produced NO proof of existing insurance coverages or policies for Park West Apts., Inc same as failure to produce for DeSouza-I. Plaintiff request full and complete production.

**Doc. Production Nos: 3, 4 & 9:** defendants failed to produce evidentially materials, internal communications between its employees with "DeSouza" as subject title, inclu. documents requested of its employees' contacts with Plaintiff's out-of-state employer, Technical Staffing Resources (TSR) and engaged in combative arguments, unlawful disclosures / various US States Dept. of Labor (DOL), State and Gov't. agencies and other entities. These included defendants obsessed attorneys, Paul Neil and defendants corporate counsel contacting Plaintiff's out-of-state employer, Technical Staffing Resources (TSR) and engaged in unwarranted, provocative, heated arguments and unlawful disclosures.

**Doc. Production Nos: 8, 10, 11, 12, 13 & 14:** defendant, Park West Apts. failed to produce documents requested. Including internal investigations in response to Plaintiff's complaints "DeSouza-I and II" and training to combat alleged prohibited discriminatory practices. And failure to produce documents to support defendant affirmative defenses in DeSouza-I and II.

**Doc. Production Nos: 15:** defendant, Park West Apts. failed to produce documents retained in Plaintiff's resident tenant file. These included defendants obsessed attorneys, Paul Neil & defendants corporate counsel communications w/ Plaintiff's out-of-state employer, Technical Staffing Resources (TSR) and unlawful removal of Plaintiff's complaints against defendants' employees.

**Doc. Production Nos: 18:** defendant, Park West Apts. failed to produce documents of steps it took or has taken to address prohibited discriminatory practices.

**Doc. Production Nos: 19:** defendant, Park West Apartments completely FAILED to produce ANY copy or copies of 2016-2017 Park West Apartments Rental Lease Agreement with Plaintiff, tenancy as resident tenant. Park West Apartments Rental Lease Agreement is nine (9) page document and defendants Bates Nos: DEF 001430 through DEF 001512 submissions did NOT contain ANY "2016-2017 Park West Apartments Rental Lease Agreement."

**Plaintiff, pro-se Document Production Requests to defendant, The Community Builders, Inc (TCB-Boston): -**

**Doc. Production Nos: 1 and 2:** the defendants only produced one (1) page document showing lots of missing pages w/ Ref. Defs. Bates #001512 for The Community Builders, and failed to produce full and complete copies of any existing insurance coverages. Plaintiff request full and complete production.

**Doc. Production Nos: 3, 4 & 9:** defendant, as HUD contract group administrator failed to produce evidentially materials, internal communications between its employees with “DeSouza” as subject title, inclu. documents requested of its employees’ contacts with Plaintiff’s out-of-state employer, Technical Staffing Resources (TSR) and engaged in combative arguments, unlawful disclosures. These included defendants obsessed attorneys, Paul Neil and defendants corporate counsel contacting Plaintiff’s out-of-state employer, Technical Staffing Resources (TSR) and engaged in unwarranted, provocative, heated arguments and unlawful disclosures in total violation of FHAs and HUD policies and procedures.

**Doc. Production Nos: 8, 10, 11, 12, 13 & 14:** defendant, TCB-Boston as HUD contract group administrator retains “*master files*” of all HUD tenants yet; failed to produce documents requested; inclu. internal investigations in response to Plaintiff’s complaints “DeSouza-I and II” and training to prevent and combat alleged prohibited discriminatory practices. And failure to produce documents to support defendant affirmative defenses in DeSouza-I and II.

**Doc. Production Nos: 15:** defendant, TCB-Boston. failed to produce documents retained in Plaintiff’s resident tenant file. These included defendants obsessed attorneys, Paul Neil & defendants corporate counsel communications w/ Plaintiff’s out-of-state employer, Technical Staffing Resources (TSR) and unlawful removal of Plaintiff’s complaints against defendants’ employees.

**Doc. Production Nos: 16 & 18:** defendant, as HUD contract administrator failed to produce docs. and disciplinary docs. of FHAs violators and steps has taken to address prohibited discriminatory practices.

**Doc. Production Nos: 19:** defendant, TCB-Boston also, completely FAILED to produce ANY “*master copy*” of 2016-2017 Park West Apartments Rental Lease Agreement with Plaintiff, tenancy as resident tenant. Park West Apartments Rental Lease Agreement is nine (9) page document and defendants Bates Nos: DEF 001430 through DEF 001512 submissions did NOT contain ANY “2016-2017 Park West Apartments Rental Lease Agreement.”

**Doc. Production Nos: 20:** defendant, TCB-Boston failed to produce or disclosed how its key, lead defendants witness Sr. property manager employment was suddenly terminated.

**Plaintiff, pro-se Interrogatories to Both Defendants: -**

**Interrogatories Nos: 1 & 2:** the defendants only produced one (1) page document for defendant, The Community Builders only, and produced NO proof of insurance coverages or policies for Park West Apartments, Inc same as previous DeSouza-I. Plaintiff request full and complete production.

**Interrogatories Nos: 3, 4, 5, 6, 7, 8, 10, 11, 12 & 13:** defendants failed to state facts or disclose its contentions that Plaintiff had violated or violation of HUD re-certification procedures. defendants failed to state facts or disclose its contentions of defendants continue violations against Plaintiff.

**Interrogatories Nos: 9:** defendants failed to identify specific Rockville-Vernon court judge the defendants falsely claimed ordered Plaintiff to be unlawfully be subjected to court ordered stipulation agreement.

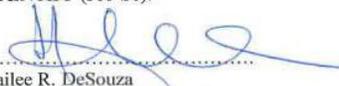
**Interrogatories Nos: 16:** defendants failed to identify individuals inclu. defendants’ attorneys who had contacted Plaintiff employer, Technical Staffing Resources (TSR) and engaged in unwarranted heated arguments with Plaintiff’s employer, TSR.

**Interrogatories Nos: 24, 25, & 31:** defendants failed to identify, provide information requested inclu. communications between employee under subject title: “DeSouza”, system of employee performance evaluation and job trainings to the RIGHTS of tenants.

**Interrogatories Nos: 29:** defendants failed to identify or disclosed or provided information requested, termination letter of defendants key, lead witness, Ms. Kim Doughtie.

**Interrogatories Nos: 30:** defendants failed to identify, provide information requested of academic backgrounds of the defendants even though the defendants requested Plaintiff to produce copy of Plaintiff’s university degree. Plaintiff seeks the same from the defendants as well.

PLAINTIFF (Pro-Se):

  
Hailee R. DeSouza  
157 Terrace Dr. /Vernon, CT 06066  
Tel: 860-871-9559

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

HAILEE R. DeSOUZA  
(Pro-Se)

**Vs.**

PARK WEST APARTMENTS, INC  
(dba NEW PARK WEST LP)

Defendant #1

THE COMMUNITY BUILDERS, INC

Defendant #2

CIVIL ACTION NO: 3:15-CV-01668-MPS  
3:17-CV-00016-MPS

October 05, 2017

TRIAL by Federal JURY

**PLAINTIFF (pro-se) DISCOVERY DISPUTES**  
**PLAINTIFF'S SECOND (2<sup>nd</sup>) - SET OF INTERROGATORY REQUESTS**  
**TO BOTH DEFENDANTS**

**Interrogatory No. 1:** Indicate the type of and current *Insurance Coverage* separately for the part or ALL of the claim(s) in Plaintiff's Constitutional, Civil and Privacy Rights violated lawsuit against defendants, Park West Apartments, Inc and The Community Builders, Inc (TCB-Boston, MA).

**Interrogatory No. 2:** Specify the name of the Insurance Company or the Insurer(s) and the policy number(s) of the Applicable Policy or Policies separately for defendants, Park West Apartments, Inc and The Community Builders, Inc (TCB-Boston, MA). Also, describe the coverage and provide the Policy Limits separately for defendants, Park West Apartments, Inc and The Community Builders, Inc (TCB-Boston, MA) for the record.

**Interrogatory No. 3:** State ALL facts in FULL supporting Defendants claims and contentions that Plaintiff had VIOLATED HUD Interim Re-Certification Procedures after Plaintiff's out-of-contract income was reported to defendant, Park West Apartments by fax at the request of Plaintiff on Jan. 28, 2014.

**Interrogatory No. 4:** State ALL facts in FULL supporting Defendants claims and contentions that Plaintiff had VIOLATED HUD Annual Re-Certification Procedures on 06/10/2014.

**Interrogatory No. 5:** State ALL facts in FULL supporting Defendants claims and contentions that Plaintiff had VIOLATED HUD Annual Re-Certification Procedures on 06/10/2014, leading to court eviction proceedings against Plaintiff on 06/12/2014 in Rockville-Vernon Superior court.

**Interrogatory No. 6:** State ALL facts in FULL supporting defendants, contentions that Plaintiff (pro-se) "Privacy Rights" be Violated in July 2014 by defendant, Park West Apartments, Sr. property manager, Ms. Kim M. Doughtie (formerly known Kim M. Smith) to Vernon police, to over thirty (30) resident tenants families and resident children.

**Interrogatory No. 7:** State ALL facts in FULL supporting defendants contentions, FULLY supported by PROOF that Plaintiff (pro-se) facing unlawful eviction at the time have viciously beaten, abused, molested, raped **both** defendants, Sr. property manager, Ms. Kim M. Doughtie (formerly known Kim M. Smith) own daughter, Athena M. Doughtie and her ten (10) month old daughter and left them in pools of blood in their apartment unit #146 Terrace Dr., Vernon, CT 06066 in the SAME residential property of Park West Apartments in July 2014 reported to Vernon police, to over thirty (30) Park West Apartments, Inc resident tenants families and resident children and therefore asked Vernon police to arrest Plaintiff facing unlawful eviction at the time.

**Interrogatory No. 8:** State ALL facts in FULL supporting Defendant #1 and Defendants #2 contentions that Plaintiff (pro-se) "Privacy Rights" again be Violated in August 2014 by defendants, office staff employee's Ms. Krystal Rabbelt's, thirteen (13) year old step-daughter.

**Interrogatory No. 9:** State ALL facts in FULL supporting Defendants contentions, FULLY supported by PROOF that a Vernon eviction court judge due to his/her unavailability; had authorized parties to sign unto "Judge Ordered Stipulation Agreement" on 08/29/2014.

**Interrogatory No. 10:** State ALL facts in FULL supporting Defendants claims and contentions that Plaintiff had:

- (a). VIOLATED HUD Interim Re-Certification Procedures on 09/03/2014,
- (b). Also violated Judge Ordered Stipulation Agreement of 08/29/2014,
- (c). Supported by Defendants Affidavit by its Sr. property manager, Ms. Kim M. Doughtie.
- (d). And as a result, Defendants rights and authority for possession of Plaintiff's apartment unit no, 157 Terrace Dr. in defendants eviction proceedings on 09/12/2014.

**Interrogatory No. 11:** State ALL facts in FULL supporting Defendants claims and contentions, and also supported by defendant, Park West Apartments Affidavit; that Plaintiff had violated HUD Interim Re-Certification Procedures in December 2014 through February 2015 after Plaintiff's out-of-contract income was reported directly by Plaintiff's employer to defendant, Park West Apartments by fax on December 17, 2014 at the request of Plaintiff.

**Interrogatory No. 12:** State ALL facts in FULL supporting Defendants claims and contentions that Plaintiff (pro-se) "Privacy Rights" again be Violated in December 2014 through April 2015 by various staffs of both Defendants employees including two (2) of defendants attorneys (all males) calls to Plaintiff's out-of-state employer as being in full accordance to HUD Policy Procedures under the FHAs.

**Interrogatory No. 13:** State ALL facts in FULL supporting Defendant #1 claims and contentions that Plaintiff (pro-se) asserting that Plaintiff was hiding his income between November 2014 through April 2015 leading to termination of HUD benefits and eviction proceedings by Defendants in full accordance to HUD Policy Procedures under the FHAs.

**Interrogatory No. 16:** Identify ALL persons of defendants #1 and #2 office staffs, including any of defendants attorneys, supervisory employee, its regional directors and operations employees who had contacted and communicated with Plaintiff's out-of-state employer, Technical Staffing Resource (TSR) between December 17, 2015 through April 2015 relative to all factual allegations as set-forth in "DeSouza #2" Federal Complaint lawsuit with or under the subject title "Hailee DeSouza" or as "DeSouza".

**Note:** for the purposes of these plaintiff's interrogatories "Answer" and "Describe" those communications and also provide the following: -

- (a). The dates and place (a.k.a. office locations) of ALL contacts of such communications.
- (b). The name of the person making such contacts and communications.
- (c). The name of the person making such contacts and communications written communication discussions and documented nature of communications.

**Interrogatory No. 24:** For each of the foregoing interrogatories, identify and provide ALL persons communication(s) or discussion(s) either by oral, phone, written, email(s), letters, directives, faxes, reports between employees of defendant, Park West Apartments and defendant, The Community Builders, Inc (See employees list below of current and former employees) between Nov. 2013 to current 2017 with respect to Plaintiff, Hailee DeSouza, with or under the subject title "Hailee DeSouza" or as "DeSouza" in ALL defendant, Park West Apartments communications with its staff named below: -

- (a). Ms. Kim M. Doughtie.
- (b). Ms. Lori Gannuscio.
- (c). Ms. Kim M. Doughtie's boyfriend the security guard
- (d). Ms. Lori Gannuscio's boyfriend maintenance personnel
- (e). Mr. Roman Castro
- (f). Ms. Valeria Vitukinas
- (g). Ms. Linda Buck,
- (h). Ms. Kystal Rabbett,
- (i). Ms. Ms. Cristal Munoz

**Note:** In addition, and purpose of these Interrogatives the following information must be provided: -

- (a). For Documents:
  - (i). The type of document
  - (ii). The general subject matter of the document
  - (iii). The date of the document

- (iv). Such other information as is sufficient to identify the document for a “subpoena duces tecum”, including where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other and
- (b). For Oral Communications:
  - (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;
  - (ii). The date and place of the communication,
  - (iii). The general subject matter of the communication.

**Interrogatory No. 25:** For each of the foregoing interrogatories, identify and provide ALL persons communication(s) or discussion(s) either by oral, phone, written, email(s), letters, directives, faxes, reports etc. between employees of both Defendants, (See defendant list below of current and former employees) between defendant Park West Apartments, assigned supervisory employee or decision maker or its regional director or with Mr. Tony Berthod between Nov. 2013 to current 2017 with respect to Plaintiff, Hailee DeSouza, with or under the subject title “Hailee DeSouza” or as “DeSouza” in ALL of both defendants communications with its staff named below: -

- (a). Ms. Kim M. Doughtie.
- (b). Ms. Lori Gannuscio.
- (c). Ms. Kim M. Doughtie’s boyfriend the security guard
- (d). Ms. Lori Gannuscio’s boyfriend maintenance personnel
- (e). Mr. Roman Castro
- (f). Ms. Valeria Vitukinas
- (g). Ms. Linda Buck,
- (h). Ms. Kystal Rabbett,
- (i). Ms. Ms. Cristal Munoz

**Note:** In addition, and purpose of these Interrogatives the following information must be provided: -

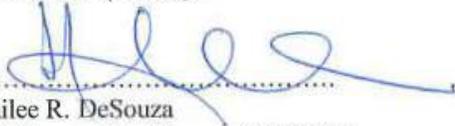
- (a). For Documents:
  - (i). The type of document
  - (ii). The general subject matter of the document
  - (iii). The date of the document
  - (iv). Such other information as is sufficient to identify the document for a “subpoena duces tecum”, including where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other and
- (b). For Oral Communications:
  - (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;
  - (ii). The date and place of the communication,

(iii). The general subject matter of the communication.

**Interrogatory No. 30:** For each employee (full-time, or former employee or part-time employee) named or identified in Item-26 above, provide each employee academic qualification, education background for the job title, job description and task(s) assigned who worked at or currently employed at defendant, Park West Apartments, Vernon, CT from Nov. 2013 to 2016.

**Interrogatory No. 31:** For each employee (full-time, or former employee or part-time employee) named or identified in Item-26 above, provide ANY on-the-job training provided with respect to the RIGHTS of Park West Apartments Resident tenants for each employee identified who worked at or currently employed at Park West Apartments, Vernon, CT from 2012 to 2016.

PLAINTIFF (Pro-Se):

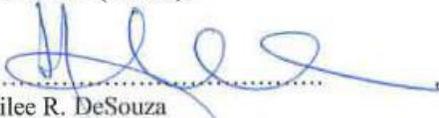


Hailee R. DeSouza  
157 Terrace Dr. /Vernon, CT 06066  
Tel: 860-871-9559

**CERTIFICATE PROOF OF SERVICE:**

This is to certify that the defendants or individual named below have been served with same by email on October / 05 /2017

PLAINTIFF (Pro-Se):



Hailee R. DeSouza  
157 Terrace Dr. /Vernon, CT 06066  
Tel: 860-871-9559

cc:

Defendants Atty:

Edward M. Richters  
Jackson Lewis LLP  
90 State House Square, 8<sup>th</sup> Floor.  
Hartford, CT 06103  
Tel: 860-522-0404

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

HAILEE R. DeSOUZA  
(Pro-Se)

**Vs.**

PARK WEST APARTMENTS, INC  
(dba NEW PARK WEST LP)

Defendant #1

THE COMMUNITY BUILDERS, INC

Defendant #2

CIVIL ACTION NO: 3:15-CV-01668-MPS  
3:17-CV-00016-MPS

October 05, 2017

TRIAL by Federal JURY

**PLAINTIFF (pro-se) DISCOVERY DISPUTES**  
**PLAINTIFF'S SECOND (2<sup>nd</sup>.) - SET OF DOCUMENTS PRODUCTION REQUESTS**  
**TO DEFENDANT, "PARK WEST APARTMENTS, INC"**

**Document Request No. 1:** Produce FULL copies of ALL documents related to ALL current Insurance policies or policy documents for Defendant, Park West Apartments, Inc.

**Document Request No. 2:** Produce the name of the Insurance Company or the Insurer(s) and the policy number(s) of the Applicable Policy or Policies for Defendant #1. Also, describe the coverage and provide the Policy Limits for Defendant #1 for the record.

**Document Request No. 3:** For each of the foregoing Document Production Requests, produce ALL documents relating to ALL persons of defendant, Park West Apartments staffs, internal communications amongst staffs themselves, (See list below of current and former employees) either by oral, phone, written, Email(s), letters, directives, faxes, between defendant, Park West Apartments, Inc employees between Nov. 2013 to current 2017 with respect to Plaintiff, Hailee DeSouza, or under the subject title, "Hailee DeSouza" or as "DeSouza": -

- |  |                            |
|--|----------------------------|
| (a). Ms. Kim M. Doughtie.                                    | (e). Mr. Roman Castro      |
| (b). Ms. Lori Gannuscio.                                     | (f). Ms. Valeria Vitukinas |
| (c). Ms. Kim M. Doughtie's boyfriend<br>the security guard   | (g). Ms. Linda Buck,       |
| (d). Ms. Lori Gannuscio's boyfriend<br>maintenance personnel | (h). Ms. Krystal Rabbett,  |
|  | (i). Ms. Ms. Cristal Munoz |

Note: In addition, and purpose of these Document Production Requests the following information must be provided: -

- (a). For Documents:

- (i). The type of document
- (ii). The general subject matter of the document
- (iii). The dates and place (a.k.a. office locations) of ALL contacts of such communications.
- (iv). The name of the person making such contacts and communications.
- (v). The name of the person making such contacts and communications written communication discussions and documented nature of communications.
- (vi). Such other information as is sufficient to identify the document for a “subpoena duces tecum”, including where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other and

(b). For Oral Communications:

- (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;
- (ii). The date and place of the communication,
- (iii). The general subject matter of the communication.

**Document Request No. 4:** For each of the foregoing Document Production Requests, produce ALL documents relating to ALL persons of defendant, Park West Apartments staffs, (See list below of current and former employees) communications either by oral, phone, written, Email(s), letters, directives, faxes, between Defendant, Park West Apartments, Inc employees and defendant, The Community Builders, Inc employees between Nov. 2013 to current 2017; with respect to Plaintiff, Hailee DeSouza, or under the subject title “Hailee DeSouza” or as “DeSouza”: -

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>(a). Ms. Kim M. Doughtie.</li> <li>(b). Ms. Lori Gannuscio.</li> <li>(c). Ms. Kim M. Doughtie’s boyfriend the security guard</li> <li>(d). Ms. Lori Gannuscio’s boyfriend maintenance personnel</li> </ul> | <ul style="list-style-type: none"> <li>(e). Mr. Roman Castro</li> <li>(f). Ms. Valeria Vitukinas</li> <li>(g). Ms. Linda Buck,</li> <li>(h). Ms. Krystal Rabbett,</li> <li>(i). Ms. Ms. Cristal Munoz</li> </ul> |
|---|--|

Note: In addition, and purpose of these Document Production Requests the following information must be provided: -

(a). For Documents:

- (i). The type of document
- (ii). The general subject matter of the document
- (iii). The dates and place (a.k.a. office locations) of ALL contacts of such communications.
- (iv). The name of the person making such contacts and communications.
- (v). The name of the person making such contacts and communications written communication discussions and documented nature of communications.
- (vi). Such other information as is sufficient to identify the document for a “subpoena duces tecum”, including where appropriate, the author of the document, the addressee

of the document, and where not apparent, the relationship of the author and addressee to each other and

(b). For Oral Communications:

- (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;
- (ii). The date and place of the communication,
- (iii). The general subject matter of the communication.

**Document Request No. 5:** For each of the foregoing Document Production Requests, produce ALL documents relating to ALL persons of defendant, Park West Apartments staffs, (See list below of current and former employees) including defendant, Park West Apartments attorney(s) communications and contacts either by oral, phone, written, Email(s), letters, directives, faxes, between Defendant #1, (Park West Apartments, Inc) employees and defendant, The Community Builders, Inc employees, including The Community Builders, Inc attorney(s) between Nov. 2013 to current 2017; with ALL of Plaintiff's employers, US Dept. of Labor offices of various states, or ANY Gov't. agencies or entities, or any entities, with respect to Plaintiff, Hailee DeSouza, or under the subject title "Hailee DeSouza" or as "DeSouza": -

- (a). Ms. Kim M. Doughtie.
- (b). Ms. Lori Gannuscio.
- (c). Mr. Roman Castro
- (d). Ms. Valeria Vitukinas
- (e). Ms. Linda Buck,
- (f). Ms. Krystal Rabbett,
- (g). Ms. Ms. Cristal Munoz

Note: In addition, and purpose of these Document Production Requests the following information must be provided: -

(a). For Documents:

- (i). The type of document
- (ii). The general subject matter of the document
- (iii). The dates and place (a.k.a. office locations) of ALL contacts of such communications.
- (iv). The name of the person making such contacts and communications.
- (v). The name of the person making such contacts and communications written communication discussions and documented nature of communications.
- (vi). Such other information as is sufficient to identify the document for a "subpoena duces tecum", including where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other and

(b). For Oral Communications:

- (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;

- (ii). The date and place of the communication,
- (iii). The general subject matter of the communication.

**Document Request No. 8:** Identify and produce ALL documents in defendant, Park West Apartments possession and control concerning Plaintiff's factual allegations in the Complaint or the Answer.

**Note:** Identify the author of each such document and state the demands to which such documents are responsive.

**Document Request No. 9:** Identify and produce ALL documents in defendant, Park West Apartments, possession and control concerning the communications identified in response to Plaintiff's Interrogatory No: #16. **Note:** Identify the author of each such document.

**Document Request No. 10:** Identify and produce ALL documents in defendant, Park West Apartments possession and control concerning any investigations made by Park West Apartments in response to Plaintiff's Complaint lawsuit. **Note:** Identify the author of each such document.

**Document Request No. 11:** Produce all documents that reflect, refer or relate to any investigation resulting from Plaintiff complaints or concerns identified in response to Plaintiff's "DeSouza-I" and or "DeSouza-II".

**Document Request No. 13:** Produce all documents concerning defendant, Park West Apartments policy to prevent discrimination of all forms, discriminatory practices, retaliation, provocations of all types and forms, interference of RIGHTS of all forms, unlawful accusations of all types and forms (racially motivated or not), and Plaintiff's utilization of such policy, including without limitation any documents concerning Plaintiff's awareness of the policy and any documents concerning any training provided by Defendant #1 to its staffs in response to Plaintiff's "DeSouza-I" and or "DeSouza-II". **Identify the author of each such document.**

**Document Request No. 14:** Produce all documents that support, reflect, refer to any of or ALL of Defendant's Affirmative Defenses to Plaintiff's "DeSouza-I" and or "DeSouza-II" respectively.

**Document Request No. 15:** Produce ALL documents relating to FULL copies of ALL documents contained in Plaintiff, Hailee R. DeSouza's, Personal "HUD Resident Tenant Personal File" ENTIRE "Resident File(s)" in possession and control of defendant, Park West Apartments from Nov. 2013 to present 2017 relating to ALL oral, phone, written, Email(s), letters, directives, faxes, **between** defendants, Park West Apartments, Inc employees **and** The Community Builders, Inc employees, including defendants attorney(s) between Nov. 2013 to current 2017; **ALL with** Plaintiff's employers, US Dept. of Labor offices of various states, or ANY Gov't. agencies or entities, or any entities, with respect to Plaintiff, Hailee DeSouza, or under the subject title "Hailee DeSouza" or as "DeSouza":-

- (a). Ms. Kim M. Doughtie.
- (b). Ms. Lori Gannuscio.

- (c). Mr. Roman Castro
- (d). Ms. Valeria Vitukinas

(e). Ms. Linda Buck,

(g). Ms. Ms. Cristal Munoz

(f). Ms. Krystal Rabbett,

**Note:** In addition, and purpose of these Document Production Requests the following information must be provided: -

(a). For Documents:

- (i). The type of document
- (ii). The general subject matter of the document
- (iii). The dates and place (a.k.a. office locations) of ALL contacts of such communications.
- (iv). The name of the person making such contacts and communications.
- (v). The name of the person making such contacts and communications written communication discussions and documented nature of communications.
- (vi). Such other information as is sufficient to identify the document for a “subpoena duces tecum”, including where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other and

(b). For Oral Communications:

- (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;
- (ii). The date and place of the communication,
- (iii). The general subject matter of the communication.

**Document Request No. 18:** Produce all documents that refer, relate to or reflect Defendant #1 efforts or took to address and prevent such prohibited discriminatory practices, retaliation, provocations of all types and forms, interference of RIGHTS of all types and forms, unlawful accusations of all types and forms (racially motivated or not), harassments of ALL types and forms, DENIAL of access to personal HUD Resident Tenant File, violation of Plaintiff’s RIGHTS, Defendant #1 Code of Ethics violations with impunity and approved by defendant The Community Builders, Inc ECOs, unlawful vindictive, retaliatory, selective, targeted, racially motivated, dissimilatory evictions without probable cause(s), against Plaintiff; in Plaintiff’s “DeSouza-I” and or “DeSouza-II” respectively.

**Document Request No. 19:** Produce FULL copies of 2016-2017 Park West Apartments Rental Lease Agreement with Plaintiff, tenancy as resident tenant.

**Note:** Identify defendant, The Community Builders, Inc ECOs employee who issued any directives to Ms. Lori Gannuscio relative to Plaintiff’s Rental Lease Agreement renewal for 2016-2017 lease year and produce documents to that effect as claimed by Ms. Lori Gannuscio.

PLAINTIFF (Pro-Se):



Hailee R. DeSouza  
157 Terrace Dr. /Vernon, CT 06066  
Tel: 860-871-9559

CERTIFICATE PROOF OF SERVICE:

This is to certify that the defendants or individual named below have been served with same by email on  
October / 05 /2017

PLAINTIFF (Pro-Se):



Hailee R. DeSouza  
157 Terrace Dr. /Vernon, CT 06066  
Tel: 860-871-9559

cc:

Defendants Atty:

Edward M. Richters  
Jackson Lewis LLP  
90 State House Square, 8<sup>th</sup> Floor.  
Hartford, CT 06103  
Tel: 860-522-0404

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

HAILEE R. DeSOUZA  
(Pro-Se)

**Vs.**

PARK WEST APARTMENTS, INC  
(dba NEW PARK WEST LP)  
Defendant #1

THE COMMUNITY BUILDERS, INC  
Defendant #2

CIVIL ACTION NO: 3:15-CV-01668-MPS  
3:17-CV-00016-MPS

October 05, 2017

TRIAL by Federal JURY

**PLAINTIFF (pro-se) DISCOVERY DISPUTES**  
**PLAINTIFF'S SECOND (2<sup>nd</sup>.) - SET OF DOCUMENTS PRODUCTION REQUESTS**  
**TO DEFENDANT, "THE COMMUNITY BUILDERS, INC (TCB-Boston)"**

**Document Request No. 1:** Produce FULL copies of ALL documents related to ALL current Insurance policies or policy documents for Defendant, The Community Builders, Inc (TCB-Boston, MA).

**Document Request No. 2:** Produce the name of the Insurance Company or the Insurer(s) and the policy number(s) of the Applicable Policy or Policies for defendant, The Community Builders. Also, describe the coverage and provide the Policy Limits for Defendant, The Community Builders for the record.

**Document Request No. 3:** For each of the foregoing Document Production Requests, produce ALL documents relating to ALL persons of defendant, The Community Builders, Inc staffs, internal communications amongst defendants staffs themselves, either by oral, phone, written, Email(s), letters, directives, faxes, between defendant, The Community Builders, Inc, employees between Nov. 2013 to current 2017 with respect to Plaintiff, Hailee DeSouza, or under the subject title, "Hailee DeSouza" or as "DeSouza": -

Note: In addition, and purpose of these Document Production Requests the following information must be provided: -

(a). For Documents:

- (i). The type of document
- (ii). The general subject matter of the document
- (iii). The dates and place (a.k.a. office locations) of ALL contacts of such communications.
- (iv). The name of the person making such contacts and communications.
- (v). The name of the person making such contacts and communications written communication discussions and documented nature of communications.

- (vi). Such other information as is sufficient to identify the document for a “subpoena duces tecum”, including where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other and

(b). For Oral Communications:

- (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;
- (ii). The date and place of the communication,
- (iii). The general subject matter of the communication.

As Noted by Plaintiff, (pro-se): defendant, The Community Builders, Inc (TCB-Boston, MA) FAILED to produce ANY document(s) specific to defendant, The Community Builders, Inc staff themselves, for the record to specific “Non-Privileged” documents production requests as clearly indicated. In response, the defendant stated ==→ See Plaintiff’s Resident File.

Plaintiff states, the defendant, The Community Builders, Inc (TCB-Boston, MA) statement ==→ See Plaintiff’s Resident File is deficient and meaningless since the defendant failed to produce the Plaintiff’s Resident File or the master file Plaintiff’s Resident File or specific documents production to Plaintiff, (pro-se) upon defendants submission dated August 21, 2017.

**Document Request No. 8**: Identify and produce ALL documents in defendant, The Community Builders, Inc possession and control concerning Plaintiff’s factual allegations in the Compliant or the Answer. Note: Identify the author of each such document and state the demands to which such documents are responsive.

**Document Request No. 10**: Identify and produce ALL documents in defendant, The Community Builders, Inc possession and control concerning any investigations made by The Community Builders, Inc in response to Plaintiff’s Complaint lawsuit. Note: Identify the author of each such document.

As Noted by Plaintiff, (pro-se): defendant, The Community Builders, Inc as HUD contract group administrator and supervising authority; FAILED to identify and produce ANY Non-Privileged” document(s) to any investigation(s) conducted by defendant, The Community Builders, Inc to Plaintiff’s document production requests under discovery. The information sought under discovery is “Non-Privileged” and therefore NOT an information protected by ANY attorney-client so-called privilege and/or the attorney work-product doctrine whatsoever.

**Document Request No. 11**: Produce all documents that reflect, refer or relate to any investigation resulting from Plaintiff complaints or concerns identified in response to Plaintiff’s “DeSouza-I” and or “DeSouza-II”.

**Document Request No. 12:** Produce all documents that reflect, refer or relate to and discipline imposed as a result of the complaints or concerns identified in response to Plaintiff’s “DeSouza-I” and or “DeSouza-II”.

**Document Request No. 13:** Produce all documents concerning defendant, The Community Builders, Inc policy to prevent discrimination of all forms, discriminatory practices, retaliation, provocations of all types and forms, interference of RIGHTS of all forms, unlawful accusations of all types and forms (racially motivated or not), and Plaintiff’s utilization of such policy, including without limitation any documents concerning Plaintiff’s awareness of the policy and any documents concerning any training provided by defendant to its staffs in response to Plaintiff’s “DeSouza-I” and or “DeSouza-II”. Identify the author of each such document.

**Document Request No. 14:** Produce all documents that support, reflect, refer to any of or ALL of defendant’s Affirmative Defenses to Plaintiff’s “DeSouza-I” and or “DeSouza-II” respectively.

**Document Request No. 15:** Produce ALL documents relating to FULL copies of ALL documents contained in Plaintiff, Hailee R. DeSouza’s, Personal “HUD Resident Tenant Personal Master File” ENTIRE “Resident File(s)” in possession and control of defendant, The Community Builders from Nov. 2013 to present 2017 relating to ALL oral, phone, written, email(s), letters, directives, faxes, **between** The Community Builders, Inc) employees, **and** Park West Apartments, Inc employees (**See lists below**); between 2013 to current 2017; **with ALL of** Plaintiff’s employers, US Dept. of Labor offices of various states, or ANY Gov’t. agencies or entities, or any entities, with respect to Plaintiff, Hailee DeSouza, or under the subject title “Hailee DeSouza” or as “DeSouza”:-

- |                            |                            |
|----------------------------|----------------------------|
| (a). Ms. Kim M. Doughtie.  | (e). Ms. Linda Buck,       |
| (b). Ms. Lori Gannuscio.   | (f). Ms. Kystal Rabbett,   |
| (c). Mr. Roman Castro      | (g). Ms. Ms. Cristal Munoz |
| (d). Ms. Valeria Vitukinas |                            |

**Note:** In addition, and purpose of these Document Production Requests the following information must be provided: -

- (a). For Documents:
- (i). The type of document
  - (ii). The general subject matter of the document
  - (iii). The dates and place (a.k.a. office locations) of ALL contacts of such communications.
  - (iv). The name of the person making such contacts and communications.
  - (v). The name of the person making such contacts and communications written communication discussions and documented nature of communications.
  - (vi). Such other information as is sufficient to identify the document for a “subpoena duces tecum”, including where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other and
- (b). For Oral Communications:

- (i). The name of the person making the communication and the name(s) of the person present while the communication was made, where not apparent, the relationship of the person(s) present to the person making the communication;
- (ii). The date and place of the communication,
- (iii). The general subject matter of the communication.

**Document Request No. 16:** Produce the complete personnel and disciplinary files for, each person whom Plaintiff had fully identified in Plaintiff's "DeSouza-I" and or "DeSouza-II" lawsuits respectively are alleged to have perpetuated discriminatory practices, retaliation, provocations of all types and forms, interference of RIGHTS of all types and forms, unlawful accusations of all types and forms (racially motivated or not), harassments of ALL types and forms, DENIAL of access to personal HUD Resident Tenant File, violation of Plaintiff's RIGHTS, defendant, The Community Builders, Inc, Code of Ethics violations with impunity and approved by defendant, The Community Builders, Inc ECOs, unlawful vindictive, retaliatory, selective, targeted, racially motivated, dissimulatory evictions without probable cause(s), against Plaintiff, including but not limited to application for employment, disciplinary records, performance records, criminal records, academic qualifications to position assigned and held, termination and training. Identify the author of each such document.

**Document Request No. 18:** Produce all documents that refer, relate to or reflect defendant, The Community Builders, Inc efforts or took to address and prevent such prohibited discriminatory practices, retaliation, provocations of all types and forms, interference of RIGHTS of all types and forms, unlawful accusations of all types and forms (racially motivated or not), harassments of ALL types and forms, DENIAL of access to personal HUD Resident Tenant File, violation of Plaintiff's RIGHTS, defendant, Community Builders, Inc Code of Ethics violations with impunity and approved by defendant, The Community Builders, Inc ECOs, unlawful vindictive, retaliatory, selective, targeted, racially motivated, dissimulatory evictions without probable cause(s), against Plaintiff; in Plaintiff's "DeSouza-I" and or "DeSouza-II" respectively.

**Document Request No. 19:** Produce FULL master copies of 2016-2017 Park West Apartments Rental Lease Agreement with Plaintiff, tenancy as resident tenant in possession of defendant, defendant, Community Builders or specific instructions given by defendant, The Community Builders, Inc office staff(s) employee to Ms. Lori Gannuscio relative to Plaintiff's Rental Lease Agreement renewal for 2016-2017 lease year.

**Note:** Identify defendant, The Community Builders, Inc employee who issued any directives to Ms. Lori Gannuscio relative to Plaintiff's Rental Lease Agreement renewal to Plaintiff's Rental Lease Agreement renewal for 2016-2017 lease year lease year and produce documents to that effect as claimed by Ms. Lori Gannuscio.

**Document Request No. 25:** Produce copies of ALL documents under which defendants main character witness employee; Ms. Kim M. Doughtie (formerly Ms. Kim Smith) employment was terminated by Defendant #2. Also indicate date of such employment termination of Kim Doughtie including notice of termination letter for the record.

PLAINTIFF (Pro-Se):



Hailee R. DeSouza  
157 Terrace Dr. /Vernon, CT 06066  
Tel: 860-871-9559

CERTIFICATE PROOF OF SERVICE:

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