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October 16, 2017

VIA EMAIL (Alexander Self@ctd.uscourts.gov)

The Honorable Michael P. Shea
 Abraham Ribicoff Federal Building
 United States Courthouse
 450 Main Street - Room 623
 Hartford, CT 06103

RE: Hailee R. DeSouza v. Park West Apartments, Inc. and
 The Community Builders, Inc.
 Case No.: 3:15-cv-01668-MPS
 Case No.: 3:17-cv-00016-MPS

Dear Judge Shea:

Defendants hereby submit this letter in accordance with the Court's October 12, 2017 Order (Docket Entry No. 114) requiring a response to Plaintiff's October 5, 2017 letter concerning discovery disputes.

Due to the two page limit for this letter, Defendants are not including a detailed discussion as to specific discovery disputes. Nonetheless, as a general matter, Defendants submit that: (1) there is significant redundancy with prior discovery requests that have already been responded to and, where necessary, resolved by the Court; (2) many of these disputes lie in the fact that Plaintiff's discovery requests are difficult to understand, and despite Defense counsel's best efforts to obtain clarification, they have not been successful in doing so; (3); to the extent the discovery requests are understood, Defendants have produced any non-privileged and relevant documents of which they are aware and have provided what Defendants believe are adequate interrogatory responses; and (4) the Court has already sustained some of Defendants' objections to Plaintiff's requests, which Defendants have reasserted as to these supplemental discovery requests.

On September 21, 2017, Defense counsel spent an hour and a quarter on the phone with the Plaintiff in a good faith effort to discuss their responses and resolve existing disputes.

Defendants' responses to the specific Requests for Production and Interrogatories at issue are enclosed herewith for the Court's review.

Very truly yours,

JACKSON LEWIS, P.C.



Edward M. Richters

EMR/dpl
Enclosure

cc: Hailee R. DeSouza (via email and UPS overnight delivery with enclosure)
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