

DESOUZA v. PARK WEST APARTMENTS ET AL
CASE NOS.: 3:15-cv-01668-MPS, 3:17-cv-00016-MPS

REQUESTS FOR PRODUCTION IN DISPUTE

1. Produce FULL copies of ALL documents related to ALL Insurance policies or policy documents for defendant #2 (Park West Apartments, Inc.).

RESPONSE:

See Declaration Page attached hereto as Bates 001512.

2. Produce the name of the Insurance Company or the Insurer(s) and the policy number(s) of the Applicable Policy or Policies for Defenant #2. Also, describe the coverage and provide the Policy Limits for Defendant #2 for the record.

RESPONSE:

See Declaration Page attached hereto as Bates 001512.

3. For each of the foregoing Document Production Requests, produce ALL documents relating to ALL persons of Defendant #2 staffs, internal communications amongst Defendants #2 staffs themselves, either by oral, phone, written, Email(s), letters, directives, faxes, between Defendant #2, employees between 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.

OBJECTION:

Defendants object to this Request on the ground that it seeks information that is immaterial and irrelevant to Plaintiff's claims in this case, as framed by the allegations of Plaintiff's Complaint, and not proportional to the needs of the case, to the extent that it seeks any and all correspondence regarding Plaintiff over a four year period of time regardless of whether the correspondence has anything to do with Plaintiff's claims. Defendants further object on the ground that this Request is vague and ambiguous in its entirety, and is duplicative of Requests previously made by Plaintiff and responded to by Defendants. Finally, Defendants object to the extent that this Request seeks the

production of information or documents that is protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine.

RESPONSE: Subject to and without waiving the foregoing objection, see Plaintiff's Resident File. Defendants are not withholding any non-privileged relevant documents of which they are aware.

4. For each of the foregoing Document Production Requests, produce ALL documents relating to ALL persons of Defendant #2 staffs, communications either by oral, phone, written, Email(s), letters, directives, faxes, **between** Defendant #2, (The Community Builders, Inc) employees **and** Defendant #1, (Park West Apartments, Inc) employees (See Defendant #1 list below of current and former employees) between 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.
- (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 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.

OBJECTION: Defendants hereby incorporate their objection to Request No. 3 as if fully set forth herein.

RESPONSE: Defendants hereby incorporate their response to Request No. 3 as if fully set forth herein.

8. Identify and produce ALL documents in Defendant #2 possession and control concerning Plaintiffs 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.

OBJECTION: Defendants object to this Request on the ground that it is vague in its use of the phrase “Plaintiffs factual allegations in theAnswer.” Defendants further object to the extent that this Request seeks information protected from disclosure by the attorney-client and/or work product privileges.

RESPONSE: Subject to and without waiving the foregoing objection, see documents produced by Defendants throughout this litigation. Defendants are not withholding any non-privileged relevant documents of which they are aware.

9. Identify and produce ALL documents in Defendant #2 possession and control concerning the communications identified in response to Plaintiffs Interrogatory No: #16. Note: Identify the author of each such document.

OBJECTION: Defendants object to this Request on the ground that it is vague and ambiguous in its entirety. Defendants further object to the extent this Request seeks information protected from disclosure by the attorney-client privilege and/or the work product doctrine.

RESPONSE: Subject to and without waiving the foregoing objection, see documents produced by Defendants throughout this litigation. Defendants are not withholding any non-privileged relevant documents of which they are aware.

10. Identify and produce ALL documents in Defendant #1 possession and control concerning any investigations made by Defendant #2 in response to Plaintiff's Complaint lawsuit.

Note: Identify the author of each such document.

OBJECTION: Defendants object to this Request to the extent that it seeks information protected from disclosure by the attorney-client and/or the attorney work product privilege.

RESPONSE: Subject to and without waiving the foregoing objection, Defendants are not aware of any non-privileged investigations, and therefore, are not aware of any responsive documents. Defendants are not withholding any non-privileged relevant documents of which they are aware.

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 #1" and or "DeSouza #2".

OBJECTION: Defendants object to this Request to the extent that it seeks information protected from disclosure by the attorney-client and/or the attorney work product privilege.

RESPONSE: Subject to and without waiving the foregoing objection, Defendants are not aware of any non-privileged investigations, and therefore, are not aware of any responsive documents. Defendants are not withholding any non-privileged relevant documents of which they are aware.

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 #1" and or "DeSouza #2".

OBJECTION: The Court has already sustained Defendants' objection to producing personnel information for their employees. (See Docket No. 45, Order on Plaintiff's Requests Nos. 6 to 9.) Accordingly, Defendants again object to this Request on the ground that it seeks information that is immaterial and irrelevant to Plaintiff's claims in this case, as framed by the allegations of the Complaint, and not proportional to the needs of the case.

RESPONSE: Subject to and without waiving the foregoing objection, no discipline was imposed in connection with any allegations made by Plaintiff. Defendants are not withholding any non-privileged relevant documents of which they are aware.

13. Produce all documents concerning Defendant #2 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 #2 to its staffs in response to Plaintiff's "DeSouza #1" and or "DeSouza #2". Identify the author of each such document.

OBJECTION: **The Court has already sustained Defendants' objection to producing information in response to this Request. (See Docket No. 45, Order on Plaintiff's Interrogatory No. 7.) Accordingly, Defendants reaffirm their objection on the grounds that this Request seeks information that is irrelevant and immaterial to the case, as framed by the allegations of Plaintiff's Complaint, and is not proportional to the needs of the case inasmuch as it is not limited in time or the subject matter of this case. Based on this objection, and to the extent understood, Defendants are withholding any non-privileged relevant documents.**

14. Produce all documents that support, reflect, refer to any of or ALL of Defendant's Affirmative Defenses to Plaintiffs "DeSouza #1" and or "DeSouza #2" respectively.

OBJECTION: **Defendants object to this Request to the extent it seeks information protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine.**

RESPONSE: **Subject to and without waiving the foregoing objection, see documents produced throughout the course of this litigation. Defendants are not withholding any non-privileged relevant documents of which they are aware.**

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 #2 from 2013 to present 2017 relating to ALL oral, phone, written, Email(s), letters, directives, faxes, **between** Defendant #2, (The Community Builders, Inc) employees, including Defendant #2 attorney(s) **and** Defendant #1, (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.
- (b). Ms. Lori Gannuscio.
- (c). Mr. Roman Castro
- (d). Ms. Valeria Vitukinas
- (e). Ms. Linda Buck,
- (f). Ms. Kystal 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.

OBJECTION: **Defendants object to this Request on the ground that it is vague and ambiguous in its entirety.**

RESPONSE: **Subject to and without waiving the foregoing objection, see Plaintiff's Resident Tenant File. Defendants are not withholding any non-privileged relevant documents of which they are aware.**

16. Produce the complete personnel and disciplinary files for, each person whom Plaintiff had fully identified in Plaintiffs "DeSouza #1" and or "DeSouza #2" 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 #2 Code of Ethics violations with impunity and approved by Defendant #2 ECOs, unlawful vindictive, retaliatory, selective, targeted, racially motivated, dissimilatory 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.

OBJECTION: **The Court has already sustained Defendants' objection to producing personnel information for their employees. (See Docket No. 45, Order on Plaintiff's Requests Nos. 6 to 9.) Accordingly, Defendants again object to this Request on the ground that it seeks information that is immaterial and irrelevant to Plaintiff's claims in this case, as framed by the allegations of the Complaint, and not proportional to the needs of the case. Defendants are withholding employee personnel files based on this objection and to the extent that this Request is understood.**

18. Produce all documents that refer, relate to or reflect Defendant #2 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 Plaintiffs RIGHTS, Defendant #2 Code of Ethics violations with impunity and approved by Defendant #2 ECOs, unlawful vindictive, retaliatory, selective, targeted, racially motivated, dissimilatory evictions without probable cause(s), against Plaintiff; in Plaintiffs "DeSouza #1" and "DeSouza #2" respectively.

OBJECTION: **Defendants object to this Request on the ground that it is vague and ambiguous in its entirety. Defendants further object to the extent that this Request seeks information that is immaterial and irrelevant to Plaintiff's claims in this case, as framed by the allegations of the Complaint. Without further clarification as what information Plaintiff seeks in this Request, Defendants cannot respond to the same.**

19. Produce FULL master copies of 2016-2017 Park West Apartments Rental Lease Agreement with Plaintiff, tenancy as resident tenant in possession of Defendant #2 or specific instructions given by Defendant #2 office staff(s) employee to Ms. Lori Gannuscio relative to Plaintiff's Rental Lease Agreement renewal for 2016-2017 lease year.

Note: Identify Defendant #2 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.

OBJECTION: Defendants object to this Request on the ground that it is vague and ambiguous in its use of the phrase “[i]dentify Defendant #2 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.” Defendants further object to the extent that this Request seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine.

RESPONSE: Subject to and without waiving the foregoing objection, Plaintiff's 2016-2017 Lease Agreement is produced herewith. Defendants are not withholding any non-privileged relevant documents of which they are aware.

25. Produce copies of ALL documents under which Defendant #1 employee; Ms. Kim M. Doughtie (formerly Ms. Kim Smith) employment was terminated by Defendant. Also indicate date of such employment termination of Kim Doughtie including notice of termination letter for the record.

OBJECTION: The Court has already sustained Defendants' objection to producing personnel information for their employees. (See Docket No. 45, Order on Plaintiff's Requests Nos. 6 to 9.) Accordingly, Defendants again object to this Request on the ground that it seeks information that is immaterial and irrelevant to Plaintiff's claims in this case, as framed by the allegations of the Complaint, and not proportional to the needs of the case. Based on this objection, Defendants are withholding any responsive personnel information.

(Plaintiff has referred to Request 20 in his discovery dispute correspondence. This Request appears to be the one at issue based on his description of the issue.)

INTERROGATORY RESPONSES IN DISPUTE

INTERROGATORY NO. 1

Indicate the type of and current *Insurance Coverage* for the part or ALL of the claim(s) in Plaintiffs Constitutional, Civil and Privacy Rights violated lawsuit against Defendant #2.

RESPONSE: **See Declaration Page attached hereto as Bates 001512.**

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 for Defendant #2. Also, describe the coverage and provide the Policy Limits for Defendant #2 for the record.

RESPONSE: **See Declaration Page attached hereto as Bates 001512.**

INTERROGATORY NO. 3

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff had VIOLATED HUD Interim Re-Certification Procedures after Plaintiffs out-of-contract income was reported to Defendant #1 by fax at the request of Plaintiff on January 28, 2014.

OBJECTION: **Defendants object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object to this Interrogatory on the grounds that it is predicated on untrue facts that are contested, i.e. “after Plaintiffs out-of-contract income was reported to Defendant #1 by fax at the request of Plaintiff on January 28, 2014” and is vague and ambiguous in its use of the phrase “ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff had VIOLATED HUD Interim Re-**

Certification Procedures.” It is unclear what time period or particular instance that Plaintiff is referring to in this Interrogatory.

INTERROGATORY NO. 4

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff had VIOLATED HUD Annual Re-Certification Procedures on 06/10/2014.

OBJECTION: Defendants objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object on the ground that this Interrogatory is vague and ambiguous in its use of the phrase “State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions.”

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, on March 3, 2014, Attorney Neil Paul sent Plaintiff a kappa notice because Plaintiff had failed to provide Defendants with truthful information regarding his employment status and his financial income. On April 22, 2014, Attorney Paul issued Plaintiff a notice to quit due to Plaintiff’s failure to have some of the documentation required under the kappa notice. On June 16, 2014, and in connection with Attorney Paul’s two previously issued notices, Plaintiff was served with a writ, summons and complaint.

INTERROGATORY NO. 5

State ALL facts in FULL of Defendant #2, supporting Defendant #1 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.

OBJECTION: Defendants incorporate their objection to Interrogatory No. 4 as if fully incorporated herein.

RESPONSE: Defendants incorporate their response to Interrogatory No. 4 as if fully incorporated herein.

INTERROGATORY NO. 6

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff (pro-se) "Privacy Rights" be Violated in July 2014 by Defendant #1, property manager, Ms. Kim M. Doughtie (formerly known Kim M. Smith) to Vernon police, to over thirty (30) resident tenants families and resident children.

OBJECTION: Defendants object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object to this Interrogatory on the grounds that is predicated on untrue facts that are contested and asserts a legal conclusion, i.e. that Plaintiff (pro-se) "Privacy Rights" be Violated in July 2014 by Defendant #1, property manager, Ms. Kim M. Doughtie (formerly known Kim M. Smith) to Vernon police, to over thirty (30) resident tenants families and resident children." Finally, Defendants object to this Interrogatory on the grounds that it is vague and ambiguous in its entirety. It is unclear what circumstances or event Plaintiff is referring to in this Interrogatory.

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, Defendants have no knowledge of any of Plaintiff's privacy rights being violated, and did not violate any privacy rights to which Plaintiff is entitled under the law.

INTERROGATORY NO. 7

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions, FULLY supported by PROOF that Plaintiff (pro-se) have viciously beaten, abused, molested, raped both Defendant #1, property manager, Ms. Kim M. Doughtie (formerly known Kim M. Smith) 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 Defendant #1 in July 2014 reported by Defendant #1, property manager, Ms. Kim M. Doughtie (formerly known Kim M. Smith) to Vernon police, to over thirty (30) Park West Apartments, Inc resident tenants families and resident children.

OBJECTION: Defendants object to this Interrogatory on the grounds that it is indecipherable as to what information is being requested, and therefore, cannot be answered.

INTERROGATORY NO. 8

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff (pro-se) "Privacy Rights" again be Violated in August 2014 by Defendant #1, office staff employee's Ms. Krystal Rabbelt's, thirteen (13) year old step-daughter.

OBJECTION: Defendants object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object to this Interrogatory on the grounds that it is predicated on untrue facts that are contested and asserts a legal conclusion, i.e. that "Plaintiff (pro-se) "Privacy Rights" again be Violated in August 2014 by Defendant #1, office staff employee's Ms. Krystal Rabbelt's, thirteen (13) year old step-daughter." Finally, Defendants object to this Interrogatory on the grounds that it is vague and ambiguous in its entirety. It is unclear what circumstances or event Plaintiff is referring to in this Interrogatory.

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, Defendants have no knowledge of any of Plaintiff's privacy rights being violated, and did not violate any privacy rights to which Plaintiff is entitled under the law.

INTERROGATORY NO. 9

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and 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.

OBJECTION: Defendants object to this Interrogatory on the ground that it is vague and ambiguous in its entirety.

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, Plaintiff's then-counsel, Ed Taiman, and Defendants' counsel, Neil Paul, met with a housing mediator on or about August 21, 2014 and entered into a stipulated agreement as a result of that meeting.

INTERROGATORY NO. 10

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff had:-

- (a). VIOLATED HUD Interim Re-Certification Procedures on September 03, 2014,
- (b). Also violated Judge Ordered Stipulation Agreement of 08/29/2014,
- (c). Supported by Defendant #1 Affidavit
- (d). And as a result, Defendant #1 rights and authority for possession of Plaintiff's apartment unit no, 157 Terrace Dr. in Defendant #1 eviction proceedings on 09/12/2014.

OBJECTION: Defendants object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object on the ground that this Interrogatory is vague and ambiguous in its use of the phrase “ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff had: (c) supported by Defendant #1 Affidavit (d) And as a result, Defendant #1 rights and authority for possession of Plaintiff's apartment unit no, 157 Terrace Dr. in Defendant #1 eviction proceedings on 09/12/2014.”

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood: (1) Plaintiff did not complete his annual recertification at the time set forth in the Stipulated Agreement; (2) Plaintiff did not pay the HUD-approved market rent for his unit once he no longer qualified for the subsidy; and (3) Plaintiff was not respectful and courteous to Defendants, as required by the Stipulated Agreement, in that, by way of example only, he referred to Defendants as “a lynch mob” and commented that property manager, Kim Doughtie, had “only a high school education,” and also referred to her as “mentally a disturbed sociopath, liar delusional, deceitful, mentally dysfunctional with Susan Smith Syndrome and had satanic evil symptoms of convicted murder Susan Smith and Charles Mason all loaded into one,” and that Ms. Doughtie was a “habitual thief and racist.”

INTERROGATORY NO. 11

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions, and also supported by Defendant #1 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 #1 by fax at the request of Plaintiff on December 17, 2014.

OBJECTION: Defendants object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object to this Interrogatory on the ground that it is predicated on untrue facts that are contested, i.e. “after Plaintiff s out-of-contract income was reported directly by Plaintiff s employer to Defendant #1 by fax at the request of Plaintiff on December 17, 2014.” Defendants also object to this Interrogatory as vague and ambiguous in its use of the phrase “[s]tate ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions, and also supported by Defendant #1 Affidavit.”

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, see Response to Interrogatory No. 10.

INTERROGATORY NO. 12

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions that Plaintiff (pro-se) "Privacy Rights" again be Violated in December 2014 through April 2015 by various staffs of both Defendants #1 and Defendant #2 employees including its attorneys to Plaintiff's out-of-state employer as being in full accordance to HUD Policy Procedures under the FHAs.

OBJECTION: Defendants object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object to this Interrogatory on the grounds that it is predicated on untrue facts that are contested and asserts a legal conclusion, i.e. that “Plaintiff (pro-se) "Privacy Rights" again be Violated in December 2014 through April 2015 by various staffs of both Defendants #1 and Defendant #2 employees including its attorneys to Plaintiff's out-of-state employer as being in full accordance to HUD Policy Procedures under the FHAs.” Finally, Defendants object to this Interrogatory on the grounds that it is vague and ambiguous in its entirety. It is unclear what circumstances or event Plaintiff is referring to in this Interrogatory.

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, Defendants have no knowledge of any of Plaintiff's privacy rights being violated, and did not violate any privacy rights to which Plaintiff is entitled under the law.

INTERROGATORY NO. 13

State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions, and asserting that Plaintiff was hiding his income between November 2014 through April 2015 leading to termination of HUD benefits and eviction proceedings by Defendant #1 in full accordance to HUD Policy Procedures under the FHAs.

OBJECTION: Defendants object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Defendants further object on the ground that the phrase "State ALL facts in FULL of Defendant #2, supporting Defendant #1 claims and contentions" is vague and ambiguous. Defendants also object to this Interrogatory on the ground that it mischaracterizes Defendants' position.

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, as found by Judge Prats in his June 22, 2015 Memorandum of Decision, Plaintiff's HUD benefits were terminated on or about December 1, 2014 because he failed to qualify for subsidized rent based on his income. Plaintiff thereafter failed to pay the HUD-approved market rate for his unit.

INTERROGATORY NO. 16

Identify ALL persons on Defendant #2 office staffs, including any of Defendant #2 attorneys, supervisory employee, Defendant #2 regional director and operations employee who had contacted and communicated with Plaintiff's out-of-state employer, Technical Staffing Resource Staffing (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" in ALL Defendant #1 communications with its staff named below: -

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.

OBJECTION: Defendants object to this Interrogatory on the ground that the phrase “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" in ALL Defendant #1 communications with its staff named below:” is vague and ambiguous.

RESPONSE: Subject to and without waiving the foregoing objection, and to the extent understood, Defendants did not communicate with Technical Staffing Resource Staffing (TSR) about any of Plaintiff’s lawsuits.

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 etc. between Defendant #2, (The Community Builders, Inc) employees and employees of Defendant #1, (Park West Apartments, Inc) (See Defendant #1 list below of current and former employees) between 2013 to current 2017 with respect to Plaintiff, Hailee DeSouza; with or under the subject title "Hailee DeSouza" or as "DeSouza" 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.

OBJECTION: Defendants object to this Interrogatory on the ground that it is vague and ambiguous in its entirety. Defendants also object on the ground that, inasmuch as this Interrogatory appears to seek a description of any and all communications that any of the nine individuals listed above had about Plaintiff over a four year period, regardless of whether those communications have anything to do with Plaintiff's January 5, 2017 Complaint, it is not proportional to the needs of the case and requests irrelevant and immaterial information. Defendants further object to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client and/or the attorney work product doctrine.

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 Defendant #2, (The Community Builders, Inc) employees and employees of Defendant #1, (Park West Apartments, Inc) (See Defendant #1 list below of current and former employees) between Defendant #1, assigned supervisory employee or decision maker or its regional director or with Mr. Tony Berthod between 2013 to current 2017 with respect to Plaintiff, Hailee DeSouza in ALL of Defendant #1 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.

OBJECTION: Defendants object to this Interrogatory on the ground that it is vague and ambiguous in its entirety. Defendants also object on the ground that, inasmuch as this Interrogatory appears to seek a description of any and all communications that any of the nine individuals listed above had about Plaintiff over a four year period, regardless of whether those communications have anything to do with Plaintiff's January 5, 2017 Complaint, it is not proportional to the needs of the case and requests irrelevant and immaterial information. Defendants further object to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client and/or the attorney work product doctrine.

INTERROGATORY NO. 29

For each employee (full-time, or former employee or part-time employee) named or identified in Item-26 above, whose employment has been terminated by defendant #2; And provide copy of notice of termination letter for the record.

OBJECTION: Federal Rule of Civil Procedure 33 provides that “[u]nless otherwise stipulated or ordered by the court, a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts.” Further, the parties previously agreed in their Rule 26f report that they would not seek permission from the Court to serve more than 25 interrogatories. Defendants reserve their right to further object to this Interrogatory should they be ordered by the Court to answer the same.

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 by Defendant #2, from 2013 to present 2016 to supervise Defendant #2 staffs.

OBJECTION: Federal Rule of Civil Procedure 33 provides that “[u]nless otherwise stipulated or ordered by the court, a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts.” Further, the parties previously agreed in their Rule 26f report that they would not seek permission from the Court to serve more than 25 interrogatories. Defendants reserve their right to further object to this Interrogatory should they be ordered by the Court to answer the same.

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 by Defendant #2 to supervise employee at Park West Apartments, Vernon, CT from 2012 to 2016.

OBJECTION: Federal Rule of Civil Procedure 33 provides that “[u]nless otherwise stipulated or ordered by the court, a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts.” Further, the parties previously agreed in their Rule 26f report that they would not seek permission from the Court to serve more than 25 interrogatories. Defendants reserve their right to further object to this Interrogatory should they be ordered by the Court to answer the same.