

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BLAKE J. ROBBINS, et al.,	:	Civil Action
	:	
Plaintiffs	:	No. 10-0665-JD
	:	
v.	:	
	:	
LOWER MERION SCHOOL DISTRICT,	:	
et al.,	:	
	:	
Defendants	:	

**RESPONSE OF CAROL CAFIERO IN OPPOSITION TO PLAINTIFFS'
MOTION TO COMPEL HER APPEARANCE AT DEPOSITION**

Carol Cafiero hereby responds in opposition to the motion of the plaintiffs to compel her appearance at a deposition in this action.

Carol Cafiero denies the averments in paragraphs 1 through 35 of the plaintiffs' motion as stated. Contrary to the plaintiffs' averments and contentions, the Court should not compel her appearance at a deposition in this action on April 9, 2010 pursuant to the subpoena issued by the plaintiffs' counsel. Instead, the Court should grant Mrs. Cafiero's motion to quash subpoena and stay her deposition in this action until further order of the Court.

The reasons why the Court should deny the plaintiffs' motion to compel her appearance and instead grant Mrs. Cafiero's motion to quash the subpoena are set forth in Carol Cafiero's accompanying memorandum of law in opposition to the plaintiffs' motion to compel her appearance at deposition, and also in Mrs. Cafiero's memorandum of law in support of her motion to quash subpoena filed in this action on March 18, 2010 and docketed as entry no. 24, which is incorporated by reference herein as if fully set forth at length. To summarize such reasons, the Court should quash the plaintiffs'

subpoena commanding Mrs. Cafiero to testify at a deposition to produce twenty categories of documents and things (including all of her and her family's personal computers) and stay Mrs. Cafiero's deposition in this action until further Order of the Court because requiring Mrs. Cafiero to comply with the plaintiffs' subpoena would be premature, unnecessary and would unfairly and unduly burden Mrs. Cafiero.

Respectfully submitted,

/s/ Charles D. Mandracchia
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Dated: March 29, 2010