

DOCKET NO.: LLI-CV21-5013836-S : SUPERIOR COURT
ANTHONY MACCHIAROLI : J.D. OF LITCHFIELD
v. : AT TORRINGTON
DAVE GRECO ET AL. : AUGUST 7, 2025

REPLY TO OBJECTION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

The Defendant has filed a reply to the Motion for Protective Order on Expert Witness Depositions dated July 27, 2025 claiming they are entitled to the "Complete File." The Plaintiff has obtained supporting affidavits from the experts on precisely what they relied on in formulating their opinions under the practice book. Those affidavits have been uploaded with this filing. It should be used as a baseline for this Court to determine what must be disclosed for the expert witness' depositions so we can proceed and get this case to trial.

WHEREFORE, the Court should issue a clear order of what needs to be disclosed for the expert depositions in light of the attached affidavits.

Respectfully submitted,
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The DEFENDANT

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CERTIFICATION

I hereby certify that a copy of this motion was faxed or delivered on August 7, 2025 to:

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David V. DeRosa
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