

DOCKET NO. UWY-CV-14-6026552-S	:	SUPERIOR COURT
	:	
NUCAP INDUSTRIES INC., ET AL.,	:	J.D. WATERBURY
Plaintiffs	:	
	:	
VS.	:	AT WATERBURY
	:	
PREFERRED TOOL AND DIE, INC., ET AL.,	:	
Defendants.	:	FEBRUARY 5, 2016

**PLAINTIFFS NUCAP INDUSTRIES INC. AND NUCAP US INC.’S  
OBJECTIONS TO DEFENDANT PREFERRED TOOL’S  
SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS (28-31)**

Plaintiffs NUCAP Industries Inc. (“Nucap Industries”) and Nucap US Inc., as successor to Anstro Manufacturing (“Nucap US”) (collectively, “Plaintiffs” or “NUCAP”), by and through their undersigned counsel, submit their Objections to Defendant Preferred Tool and Die, Inc.’s (“Preferred Tool”) Second Set of Requests for Production of Documents (28-31) as follows.

**GENERAL OBJECTIONS**

1. Plaintiffs incorporate by reference their Objections to Preferred’s First Set of Requests for Production of Documents, which Plaintiffs served on counsel and filed with the Court on June 19, 2015, as if fully set forth herein.

These answers and objections are based upon information now known. Plaintiffs reserve their right to amend, modify, or supplement the objections or answers stated therein.

**OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 28:**

All communications between Nucap employees and any of Nucap’s suppliers, including without limitation Trelleborg, Wolverine Advanced Materials, NICHIAS Corporation, Material Sciences Corporation, and Klinger, concerning or discussing Preferred in any manner.

**OBJECTION TO REQUEST NO. 28:** Plaintiffs object to this Request as overbroad because it is not limited to parts or trade secrets at issue in this lawsuit and, instead, seeks all

communications concerning Preferred without limitation on subject matter. Subject to and without waiving the general and specific objections, Plaintiffs have already produced communications with its suppliers for the time period at issue in this lawsuit and as it relates to the specific trade secrets at issue. Plaintiffs will also supplement their production with additional documents responsive to this Request.

**REQUEST NO. 29:**

All communications between Nucap employees and any of Nucap's customers concerning or discussing Preferred in any manner.

**OBJECTIONS TO REQUEST NO. 29:** Plaintiffs object to this Request as overbroad because it is not limited to any subject matter and is unlimited in time. Subject to and without waiving the general and specific objections, Plaintiffs have already produced documents concerning Preferred. Plaintiffs will also supplement their production with additional documents responsive to this Request.

**REQUEST NO. 30:**

All documents concerning tolerances for automotive brake parts, including but not limited to brake shims, such documents including any internal documents identifying tolerance standards and/or practices and any publically available documents, sources, texts, references, or other documents identifying or concerning tolerances.

**OBJECTIONS TO REQUEST NO. 30:** Plaintiffs object to this Request on the grounds that it is overbroad. Read literally, this Request would require Plaintiffs to search for and produce a massive amount of information that is not at issue in this lawsuit "concerning tolerances for automotive brake parts."

**REQUEST NO. 31:**

All documents concerning any public disclosure of any information, and/or any disclosure that was not subject to a confidentiality agreement or order, concerning any one of the Nucap and/or Anstro Shim Parts identified in Nucap's response to Interrogatory No. 2 and any supplements thereto, including any and all catalogues, articles, web pages, brochures, promotional documents or items, advertisements, presentations, samples, and/or customer correspondence.

**OBJECTIONS TO REQUEST NO. 31:** Plaintiffs object to this Request on the grounds that it is overbroad. Subject to and without waiving the foregoing general and specific objections, Plaintiffs have already produced catalogues, brochures and other published materials, along with customer correspondence regarding the parts at issue.

Dated: February 5, 2016

PLAINTIFFS,  
NUCAP INDUSTRIES, INC. and NUCAP  
US, INC.

By /s/Nicole H. Najam

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**CERTIFICATION**

This is to certify that a copy of the foregoing was mailed, postage prepaid or delivered electronically or non-electronically, on this 5th day of February, 2016 to all counsel and self-represented parties of record, as follows:

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