

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 INTERROGATORIES (23-25)**

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 Interrogatories (23-25) as follows.

GENERAL OBJECTIONS

1. Plaintiffs incorporate by reference their Objections to Preferred’s First Set of Interrogatories, which Plaintiffs served on counsel and filed with the Court on June 19, 2015, as if fully set forth herein.
2. Plaintiffs incorporate by reference their Answers and Objections to Preferred’s First Set of Interrogatories, which Plaintiffs served on counsel on July 20, 2015.
3. Plaintiffs incorporate by reference their Supplemental Answers and Objections to Preferred’s First Set of Interrogatories, which Plaintiffs served on counsel on September 25, 2015.
4. Plaintiffs incorporate by reference their additional Supplemental Answers and Objections to Preferred’s First Set of Interrogatories, which Plaintiffs served on counsel on October 30, 2015.

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.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 23:

Specifically identify all of Nucap’s suppliers of materials used in the production of brake shims or caliper hardware since 2009.

OBJECTIONS TO INTERROGATORY NO. 23: Plaintiffs incorporate their General Objections and all prior objections by reference. Plaintiffs object to this Interrogatory as overbroad and not reasonably calculated to lead to the discovery of admissible evidence because it is not limited to the specific trade secrets or parts at issue in this matter. Subject to, and without waiving, its objections, a response has been provided.

INTERROGATORY NO. 24:

Specifically identify all customers who have purchased brake shims or caliper hardware from Nucap since 2009.

OBJECTIONS TO INTERROGATORY NO. 24: Plaintiffs incorporate their General Objections and all prior objections by reference. Plaintiffs object to this Interrogatory as overbroad and not reasonably calculated to lead to the discovery of admissible evidence because it is not limited to the specific trade secrets or parts at issue in this matter. Subject to, and without waiving, its objections, a response has been provided.

INTERROGATORY NO. 25:

Describe in detail all communications between Nucap and any of Nucap’s suppliers of materials and/or customers concerning Preferred Tool and Die, Inc. and/or Preferred Automotive Components.

OBJECTIONS TO INTERROGATORY NO. 25: Plaintiffs incorporate the General Objections and all prior objections by reference. In addition to the General Objections, Plaintiffs object to this Interrogatory as overbroad and unduly burdensome. Read literally, this Interrogatory would require Plaintiffs to survey every single one of their employees to determine what communications, if any, such employees may have had with any of Nucap’s suppliers and/or customer concerning Preferred Tool and Die, Inc. and/or Preferred Automotive Components, for an unlimited period of time. Preferred Tool and Die, Inc., had previously been a supplier to Plaintiff Nucap US, as successor to Anstro Manufacturing, Inc. and, therefore, this Interrogatory would also seemingly require Plaintiffs to identify every communication that may

CONFIDENTIAL – ATTORNEYS’ EYES ONLY

have occurred between Nucap US and Preferred Tool and Die, Inc. going back many years and covering subject matter unrelated to the issues involved in this case. Subject to, and without waiving, the foregoing objections, Plaintiffs are not aware of any communications other than those that may be reflected in documents that were already produced.

Dated: February 5, 2016

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

By /s/Nicole H. Najam

Stephen W. Aronson
Email: saronson@rc.com
Nicole H. Najam
Email: nnajam@rc.com
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Tel. No. (860) 275-8200
Fax No. (860) 275-8299
Juris No. 50604

Of counsel:
DUANE MORRIS LLP
Lawrence H. Pockers
(*Pro Hac Vice*)
Harry M. Byrne
(*Pro Hac Vice*)
30 South 17th Street
Philadelphia, PA 19103
Telephone: 215.979.1000
Fax: 215.979.1020
LHPockers@duanemorris.com
HMByrne@duanemorris.com

Attorneys for Plaintiff

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:

Stephen J. Curley, Esq.
Brody Wilkinson, P.C.
2507 Post Road
Southport, CT 06890
scurley@earthlink.net

Gene S. Winter, Esq.
Benjamin J. Lehberger
St. Onge Steward Johnston & Reens
986 Bedford Street
Stamford, CT 06906
gwinter@ssjr.com

/s/Nicole H. Najam
Nicole H. Najam

DM1\6547642.3