

DOCKET NO. LLI CV-15-6013124S : SUPERIOR COURT
RICHARD BLITZ, TRUSTEE OF THE
RICHARD BLITZ DEFINED BENEFIT
PENSION PLAN AND TRUST : J.D. OF LITCHFIELD
VS. : AT LITCHFIELD
GLEN LOVEJOY AND
KATHLEEN RIISKA-LOVEJOY : MARCH 17, 2016

OBJECTIONS TO DISCOVERY

Defendants hereby give notice of their objections to Plaintiff's First Set of Interrogatories dated March 9, 2016 and represent as follows:

DEFINITIONS:

The "Decedent" shall mean the defendants' son, Owen Saunders Lovejoy.

INTERROGATORIES

"9. State all medical and psychological conditions your son was diagnosed with and for and state the dates of such diagnosis, who made them and what course of treatment was recommended and/or employed."

ANSWER: Objection. As phrased, this interrogatory seeks information that is unduly burdensome, overbroad, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's

interrogatory ostensibly seeks a seventeen year span of information relating to any and all of the Decedent's "medical . . . conditions."

Defendants do not object to providing information regarding the Decedent's "psychological conditions" or mental health regardless of time. However, Defendants object to providing any information involving the Decedent's "medical . . . conditions" prior to January 1, 2010 that are not related to his mental health.

"10. State all medications your son was prescribed during his lifetime and for each one indicate the person who prescribed same, that person's contact information and the reason why each prescription was made."

ANSWER: Objection. As phrased, this interrogatory seeks information that is unduly burdensome, overbroad, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's interrogatory ostensibly seeks a seventeen year span of information relating to any and all medications prescribed to the Decedent.

Defendants do not object to providing information regarding medication prescribed for the Decedent's mental healthcare regardless of time. However,

Defendants object to providing any information involving the Decedent's prescriptions for medical conditions prior to January 1, 2010 that are not related to his mental health.

REQUESTS FOR PRODUCTION

"2. All medical and psychological records of your son evidencing the information contained in your answers to the interrogatories propounded to you herewith."

ANSWER: Objection. As phrased, this request for production is unduly burdensome, overbroad and seeks records that are immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's interrogatory ostensibly seeks a seventeen year span of records relating to any and all of the Decedent's "medical . . . conditions," and prescriptions therefore.

Defendants do not object to providing records regarding the Decedent's "psychological conditions" or mental health regardless of time. Similarly, Defendants have no objection to providing records regarding the Decedent's prescriptions for mental health conditions regardless of time. However,

Defendants object to producing any records created prior to January 1, 2010 relating to the Decedent's "medical . . . conditions," that do not involve his mental health. Defendants further object to producing any records created prior to January 1, 2010 relating to the Decedents prescriptions for "medical . . . conditions," that do not involve his mental health.

"4. Copies of your automobile, homeowner's and umbrella insurance policies for years 2010-2014."

ANSWER: Objection. Defendants object to producing any automobile insurance policies. Defendants further object to producing any homeowner's or umbrella insurance policies which existed prior to the policy that governs the subject loss. Any such policies, to the extent they exist, are immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

**THE DEFENDANTS,
GLEN LOVEJOY AND
KATHLEEN RIISKA-LOVEJOY**

By: _____

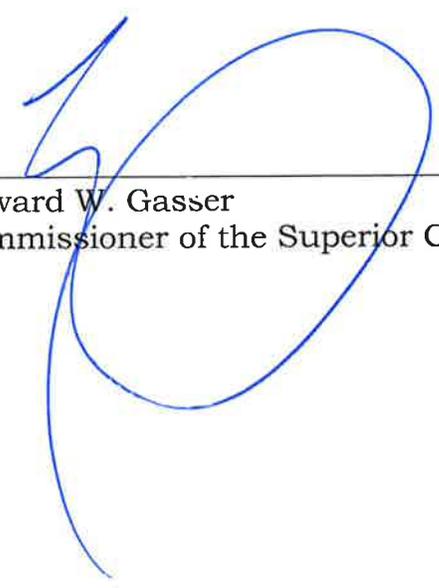
**Edward W. Gasser, Esq.
Gasser Law Firm, LLC
20 East Main Street
Avon, CT 06001-3823
Juris No. 421213
Telephone: 860-674-8342
Facsimile: 860-676-8912
egasser@gasserlaw.com**

CERTIFICATION

I hereby certify that a copy of the foregoing has been sent this date via electronic delivery to the following counsel of record accepting electronic delivery:

Zisca St. Clair, Esq.
Rome McGuigan PC
1 State Street
Hartford, CT 06103
zstclair@rms-law.com

Thomas G. Benneche, Esq.
885 Hopmeadow Street
Simsbury, CT 06070
tom@benneche.com



Edward W. Gasser
Commissioner of the Superior Court