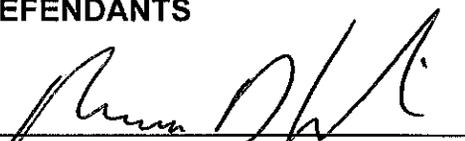


NO.: FBT-CV-15-6048078-S : SUPERIOR COURT
JONATHAN SHAPIRO : J. D. OF FAIRFIELD
VS. : AT BRIDGEPORT
FRANK DELBOUNO, ET AL. : SEPTEMBER 15, 2016

MOTION FOR PROTECTIVE ORDER

Pursuant to Practice Book Section 13-5, *et. seq.*, the Defendants, Frank Delbouno and City of Bridgeport, respectfully move the Court for a Protective Order prohibiting the Plaintiff in the above-captioned matter from taking the deposition of the Defendants' expert, Dr. David B. Brown on September 23, 2016. The Defendants seek the Court's protection as Defendants' counsel is unavailable to attend due to his multiple Court proceedings scheduled in this matter on the same day in Bridgeport Superior Court.

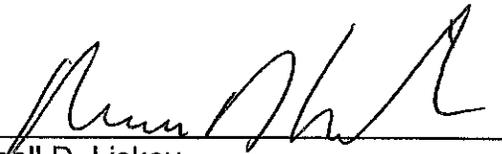
THE DEFENDANTS

BY: 
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Telephone: 203-576-7647
Juris No. 06192

CERTIFICATION

This is to certify that a copy of the foregoing was sent via first-class mail, postage prepaid, on this 15th day of September, 2016, to all counsel and pro se parties of record as follows:

Kevin C. Shea, Esq.
Clendenen & Shea, LLC
400 Orange Street
New Haven, CT 06511



Russell D. Liskov