

**REQUEST FOR ARGUMENT  
NON-ARGUABLE CIVIL SHORT  
CALENDAR MATTER**

JD-CV-128 Rev. 4-13  
P.B. §11-18(f)

STATE OF CONNECTICUT  
**SUPERIOR COURT**  
www.jud.ct.gov

REQARG



**Instructions**

1. Use this form to request argument on a non-arguable matter.
2. Use one form for each request.
3. Fill out each section of the form.
4. File the form with the court during the short calendar marking period.  
Marking periods can be found in the calendar notices or standing orders on civil or family calendars at:  
<http://www.jud.ct.gov/external/super/Standorders/>

**Notice**

If the Court grants the request, it will schedule the argument and notify all counsel of record and self-represented parties of the date and time of the hearing. Do not come to court on the original calendar date unless you have been specifically told to do so by the court.

Name of case (Plaintiff v. Defendant) <b>Nucap Industries, Inc., et al. v. Preferred Tool and Die, Inc., et al.</b>		Docket Number of the Case <b>UWY-CV-14-6026552-S</b>
Judicial District of <b>Waterbury</b>	Calendar Date <b>10/03/2016</b>	Calendar Number and Position Number <b>SC No. 12 and Pos. 22</b>

I request that the Court permit argument on the following non-arguable motion or objection:

Title of Motion or Objection that you want the court to hear argument on <b>Motion for Order of Compliance</b>	Entry Number of motion or objection <b>158.00</b>
List the title and entry number of any motions or objections related to the motion or objection you are requesting argument on <b>Motion to Seal (156.00)</b>	

Explain the reason(s) for the request:

This is a claim for misappropriation of trade secrets. The underlying discovery requests and Plaintiffs' motion for compliance concern complex issues relating to the design and manufacture of aftermarket automotive brake parts. Plaintiffs believe oral argument will be beneficial to the Court's resolution of this issue and is necessary in light of the issues raised by the motion. Plaintiffs also filed a related motion to seal to protect their trade secrets, which they request to be heard at the same time.

I am the:  
 Plaintiff  Defendant  Attorney for Plaintiff  Attorney for Defendant  Other

Name of law firm, attorney or self-represented party (Print or type)  
**Robinson & Cole LLP**

Address  
**280 Trumbull Street, Hartford, CT 06103-3597**

Telephone number (with area code)  
**(860) 275-8200**

**Certification**

I certify that a copy of this document was mailed or delivered electronically or non-electronically on (date) 09/28/2016 to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Name and address of each party and attorney that copy was mailed or delivered to\*  
**Please see attached certification.**

\*If necessary, attach additional sheet or sheets with name and address which the copy was mailed or delivered to. (You may use form JD-CV-67.)

Signed (Signature of filer) 	Print or type name of person signing <b>Stephen W. Aronson</b>	Date signed <b>09/28/2016</b>
Mailing address (Number, street, town, State and zip code) <b>280 Trumbull Street, Hartford, CT 06103-3597</b>		Telephone number <b>(860) 275-8200</b>

**The area below is for Court use only.**

Schedule the motion or objection for argument  No argument needed. Motion or objection will be considered on the papers.

Signed (Judge)	Date
----------------	------

**NOTICE**

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at [www.jud.ct.gov/ADA/](http://www.jud.ct.gov/ADA/)

**CERTIFICATION**

This is to certify that a copy of the foregoing was mailed, postage prepaid or delivered electronically or non-electronically, on this 28<sup>th</sup> day of September, 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

David A. DeBassio, Esq.  
Hinckley Allen & Snyder LLP  
20 Church Street  
Hartford, CT 06103  
ddebassio@haslaw.com

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

/s/Stephen W. Aronson  
Stephen W. Aronson