

2. Lomas objects to each Interrogatory to the extent that it seeks information or documents protected from disclosure by the attorney-client privilege, work product doctrine, marital privilege, or any other rule of privilege or confidentiality provided by law.

3. Lomas objects to each Interrogatory to the extent it requests information that is readily available to the Defendants and/or can be obtained by the Defendants with less burden and expense than it can be obtained by Lomas.

4. Lomas objects to each Interrogatory to the extent that it seeks information neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence pursuant to Practice Book § 13-2 and the Code of Evidence § 4-8(a).

5. To the extent that Lomas responds to these Interrogatories, such responses should not be construed as a representation or admission that the information provided in the response is relevant or admissible at trial.

6. Lomas objects to the extent that any Interrogatory implies the existence of facts or circumstances not of record or that do not exist, and to the extent that any Interrogatory assumes a legal conclusion. By responding, Lomas does not admit any factual or legal assumptions contained in any Interrogatory.

7. Lomas objects to the extent that any Interrogatory calls for a legal conclusion.

8. Lomas objects to Instruction No. 2 to the extent it requires Lomas to provide information that goes beyond the obligations of a party responding to interrogatories under the Connecticut Practice Book.

9. In responding to these Interrogatories, Lomas does not waive the foregoing general objections, nor does he waive the specific objections that are set forth in the responses to the individual Interrogatories below. By providing information or documents in response to the

Interrogatories, Lomas does not concede that the information or documents are relevant to this action or that they are reasonably calculated to lead to the discovery of admissible evidence.

Lomas expressly reserves his right to object to further discovery into the subject matter of these Interrogatories, to object to the introduction into evidence of any portion thereof, and to supplement or amend his responses.

10. Lomas incorporates by reference the foregoing general objections into each response set forth below.

OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 1:

Excluding the Individual Defendants, Jeffrey Fuhrman and you, identify each other person that you understand to possess knowledge or information concerning either the claims asserted by you in this Action or the defenses asserted by Defendants in this Action.

OBJECTION:

Lomas incorporates his General Objections set forth above as though fully set forth herein. In particular, Lomas objects to the Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, work product doctrine, marital privilege, or any other applicable privilege or doctrine. The inadvertent disclosure of any information covered by such protections shall not be deemed a waiver thereof.

INTERROGATORY NO. 2:

Excluding the Individual Defendants, Jeffrey Fuhrman, you and your attorney, identify each person with whom you have had any communications regarding the subject matter of the Complaint, and for each such person identified, set forth the date, time and reason for each

communication and identify all documents relating to each of the above-identified communications.

OBJECTION:

Lomas incorporates his General Objections set forth above as though fully set forth herein.

INTERROGATORY NO. 3:

Identify each and every current or former client listed on Schedule E of the Partner Wealth Management LLC Limited Liability Company Agreement dated January 1, 2015 with whom you have had any communication since January 13, 2015 and for each such person identified set forth the date, time and reason for each communication and identify all documents relating to each of the above-identified communications.

OBJECTION:

Lomas incorporates his General Objections set forth above as though fully set forth herein. In particular, Lomas objects to this Interrogatory on the grounds that is overly broad, unduly burdensome, and not reasonably limited in time or scope. Lomas additionally objects as the information sought is not relevant to the claims or parties at issue and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 4:

Identify each expert, including those that you intend to call as an expert witness at trial, who has been retained, specifically employed or consulted by you in anticipation of litigation or in preparation for trial, and for each such expert, state the subject matter on which he/she was consulted, identify any written report, summarize any oral reports, and for those experts you intend to call at trial, state the subject matter on which each such person is expected to testify, the

qualifications of the person to testify on the subject matter as an expert, and state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

OBJECTION:

Lomas incorporates his General Objections set forth above as though fully set forth herein. In particular, Lomas objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, work product doctrine, or any other applicable privilege or doctrine. The inadvertent disclosure of any information covered by such protections shall not be deemed a waiver thereof. Lomas further objects to this Interrogatory to the extent it attempts to impose upon Lomas requirements and/or obligations in addition to or different from those imposed by the Connecticut Practice Book, and specifically Connecticut Practice Book § 13-4.

Dated: November 30, 2015
Hartford, Connecticut

THE PLAINTIFF,
WILLIAM A. LOMAS

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CERTIFICATE OF SERVICE

This is to certify that on November 30, 2015, a copy of the foregoing was served by e-mail and first class mail, postage prepaid, to all counsel of record as follows:

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/s/Thomas J. Rechen
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