DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : FEBRUARY \_\_, 20\_\_

**OBJECTIONS TO DEFENDANT’S REQUEST FOR DISCLOSURE AND PRODUCTION DATED *INSERT DATE OF REQUEST***

 Pursuant to Connecticut Practice Book Sections 25-31 and 13-10, the Plaintiff submits the following objections to the Defendant’s Request for Disclosure and Production dated \_\_\_\_\_:

Request #\_\_\_\_: [Copy and Paste Request]

Objection:

**The Plaintiff objects to this request on the grounds that it is overly broad as to time and scope, unduly burdensome and oppressive, not reasonably calculated to lead to the discovery of admissible evidence, intended to harass, requests documents not within the Plaintiff’s access or control, and requests documents within the Defendant’s access and control.**

THE PLAINTIFF

 JOHN DOE

 By: 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510

CERTIFICATE OF SERVICE

 I hereby certify that a copy of the foregoing was electronically sent to the following counsel of record on this \_\_ day of February, 20\_\_:

**Insert contact info for all other parties of record**

 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510