DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : JULY \_\_, 20\_\_

**PLAINTIFF’S MOTION FOR PROTECTIVE ORDER AND OBJECTIONS RE: DEFENDANT’S NOTICE OF DEPOSITION, DATED \_\_\_\_\_\_\_\_\_, PENDENTE LITE**

 Pursuant to Practice Book §§ 13-2 and 13-5, the Plaintiff, John Doe, respectfully objects and moves the court for a protective order with respect to document requests contained within Defendant’s Notice of Plaintiff’s Deposition, dated ***insert date***.  The Plaintiff respectfully represents as follows:

1. On ***insert date***, the Defendant, through counsel, noticed the deposition of the Plaintiff for ***insert date*** at ***insert time***;
2. The Plaintiff objects and moves for a protective order with respect to requests found in the Schedule A attached to the Defendant’s ***insert date*** Notice of the Plaintiff as follows:

**Request #4**

 4. Any and all documentation reflecting income you anticipate making in 2022;

**Objection:** The Plaintiff objects to this request on the grounds that it is overly broad, speculative, not reasonably calculated to lead to the discovery of admissible evidence and designed to harass the Plaintiff.

**Request #12:**

 12. Any and all invoices you received from the marriage counselor you saw with the Defendant in 2021;

**Objection:** The Plaintiff objects to this request on the grounds that it is designed to harass the Plaintiff.  The Plaintiff further objects on the grounds that this request is irrelevant to the pending litigation and not reasonably calculated to lead to the discovery of admissible evidence.  The Plaintiff additionally objects to this request on the grounds that the documentation requested by the Defendant cannot be provided by the Plaintiff with substantially greater facility than it could otherwise be obtained by the Defendant.

**WHEREFORE,** pursuant to Practice Book §§ 13-2 and 13-5, the Plaintiff respectfully moves that:

1. The Plaintiff’s Objections, as set forth above, to the requests as set forth in Schedule A of the Defendant’s Notice of Deposition, dated ***insert date***, be sustained and that a protective order shall enter with respect thereto; and
2. Such further and different relief as the court deems fair and equitable under the circumstances.

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 July, 20\_\_:

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

 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

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