

DOCKET NO.: NNH-CV-18-6080857 : SUPERIOR COURT  
MARRISSA HACKETT : J.D. OF NEW HAVEN  
VS. : AT NEW HAVEN  
PLANNED PARENTHOOD OF  
SOUTHERN NEW ENGLAND, INC.,  
ET AL : SEPTEMBER 11, 2018

**DEFENDANT STEPHANIE MALIA'S OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Pursuant to Practice Book § 13-8 and § 13-10, defendant, Stephanie Malia, APRN, hereby objects to the plaintiff's First Set of Interrogatories and Requests for Production, dated August 15, 2018, as follows:

**INTERROGATORIES:**

2. Have you made any non-privileged "statements," as defined in Connecticut Practice Book § 13-1, to any person regarding any of the incident(s) alleged in the Complaint?

**OBJECTION:** Defendant objects to this interrogatory as it is vague, unduly burdensome, overly broad, seeks information without the requisite showing of need, and seeks materials prepared in anticipation of litigation. Specifically, the plaintiff fails to specify to which incident(s) she is referring.

3. If the answer to Interrogatory #2 is affirmative, please state the following:

- (a) name and address of person(s) to whom each statement was made;
- (b) the date on which each statement was made;
- (c) the form of each statement (i.e., whether written, made by recording device or recorded by a stenographer, etc.);
- (d) the name and address of each person having custody, or a copy or copies of each statement.

**OBJECTION:** See objection to interrogatory # 2.

9. Please identify, by full name and address, your employer(s) during the period of January 1, 2010 to present.

**OBJECTION:** Defendant objects to this interrogatory as it is not reasonably calculated to lead to the discovery of admissible evidence and/or seeks information without the requisite showing of need. Defendant further objects to this interrogatory on the basis that it seeks irrelevant and immaterial information.

10. Please identify all hospitals at which your presently hold full admitting privileges;

**OBJECTION:** Defendant objects to this interrogatory as it is not reasonably calculated to lead to the discovery of admissible evidence and/or seeks information without the requisite showing of need. Defendant further objects to this interrogatory on the basis that it seeks irrelevant and immaterial information.

11. Please identify all hospitals at which you presently hold courtesy privileges.

**OBJECTION:** Defendant objects to this interrogatory as it is not reasonably calculated to lead to the discovery of admissible evidence and/or seeks information without the requisite showing of need. This interrogatory is vague in that plaintiff fails to define “courtesy privileges.” Defendant further objects to this interrogatory on the basis that it seeks irrelevant and immaterial information.

12. If you have testified under oath, in a medical malpractice or personal injury matter, within the 5 year period preceding your response to this interrogatory, please state:

- (a) When you provided such testimony
- (b) the caption/name of the action or proceeding in which you provided such testimony.

**OBJECTION:** Defendant objects to this interrogatory as it is overly broad, unduly burdensome, immaterial, unduly intrusive, not reasonably calculated to lead to the discovery of admissible evidence and/or seeks information without the requisite showing of need.

**REQUESTS FOR PRODUCTION:**

1. All non-privileged statements identified in response to interrogatories #2 and #3 of the foregoing set of Interrogatories.

**OBJECTION:** See objections to interrogatories #2 and #3.

4. Stephanie Malia’s entire file and treatment chart (excluding privileged documents) pertaining to Marrissa Hackett, including but not limited to, all triage documents, internal requests for tests or treatment, correspondence, telephone messages, diagnostic imagery (films

and reports), laboratory results, billing statements and insurance documentation. (This request includes all typed, electronic, handwritten and transcribed documents).

**OBJECTION:**        **Defendant objects to this request because it is overly broad and unduly burdensome. Furthermore, this request seeks materials that were prepared in anticipation of litigation and are therefore privileged. Notwithstanding this objection, this defendant will produce any medical records in her possession.**

DEFENDANT,  
STEPHANIE MALIA, APRN

/s/ Rebecca N. Brindley  
Rebecca N. Brindley  
Stockman O'Connor, PLLC  
10 Middle Street  
Bridgeport, CT 06604  
Tel. No.: (203) 598-7585  
Juris #: 439250

CERTIFICATION

I hereby certify that a copy of the foregoing was mailed or emailed, per agreement to accept papers electronically in this case, on September 11, 2018 to all counsel and pro se parties of record as follows:

STEVEN J. ERRANTE, ESQ.  
MARISA A. BELLAIR, ESQ.  
Lynch, Traub, Keefe & Errante  
52 Trumbull Street  
New Haven, CT 06510  
Tel. No.: (203) 787-0275  
Fax No.: (203) 782-0278  
Juris #: 034876

*/s/ Rebecca N. Brindley*