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February 21, 2023

Via Efile

David J. Weaver, J.S.C.
Morris County Civil Division
P.O. Box 910
Morristown, NJ 07963-0910

**RE: Kanarek v. Barisone, et. al.
Docket No. MRS-L-2250-19**

Dear Judge Weaver:

This office represents plaintiff Lauren Kanarek in the above referenced matter. Presently pending before Your Honor are defendants' Motions to Hold Mr. and Mrs. Kanarek in Contempt and plaintiff's Motion to Quash Subpoenas. Plaintiff's counsel has conferred with his client and her parents and is constrained to respond to the latest filings by defendants.

Defendants' filings show that the initial subpoenas are overbroad, unduly burdensome, and purposefully harassing fishing expeditions. In their Replies, defendants acknowledge all relevant documentation was provided in the Prosecutor's File. Now, defendants re-served improper, harassing, overbroad subpoenas. Relying on pure speculation, defendants are grasping at straws and fishing for specific recordings and documents that do not exist. Had these discreet documents and recordings existed, they would have been part of the voluminous criminal claim prosecuting Barisone for the attempted murder of Lauren.

Moreover, these non-existent recordings and documents (first mentioned in Reply), are irrelevant to the Motions pending before the Court. The subpoenas, as drafted, violate the permissible bounds of discovery, and should be quashed. Again, if

defendants want to question Jonathan and Kirby Kanarek about what information they possess that differs from the information already provided via the Prosecutor's File, depositions are the appropriate vehicle. Harassing, overly broad, unduly burdensome, fishing expedition subpoenas, are not. The subpoenas should be quashed.

Respectfully,


Gregg Alan Stone

cc: All counsel of record