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BY ECOURTS

Hon. Louis S. Sceusi, J.S.C.

Law Division

N.J. Superior Court – Morris County

Washington & Court Streets

Morristown, NJ 07960

**RE: Lauren Kanarek v. Michael Barisone, et al.,
New Jersey Superior Court, Morris County
Docket No. Civil Action No. MRS-L-2250-19**

**Pending Motion to Compel Documents From Non-Party Kirby Kanarek
Pending Motion to Compel Plaintiff Lauren Kanarek's In-Person Deposition**

Your Honor:

Together with Edward J. Bilinkas, Esq., I represent defendant-counterclaimant Michael Barisone. Reference is made to my pending motion and cross-motion for discovery in this matter, and to the letter filed by Mark Silver, Esq. regarding the pending motions.

Barisone joins in the arguments made by Mr. Silver and, furthermore, must note for the record other issues.

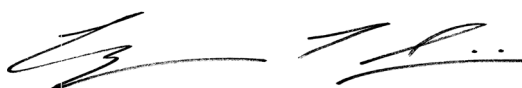
Barisone lawfully served (by service of process) a *subpoena duces tecum* calling for Kirby Kanarek (plaintiff's mother) to produce the transcripts she prepared and/or had prepared, from the illegal audio recordings made on the premises of Sweet Grass Farms. Kirby Kanarek has not made any objection to the subpoena and, to this date, has never produced any records to my office or even offered to produce such records to my office. A suggestion that Kirby might "appear" to give a "deposition" is irrelevant, because it is not a commitment to produce the records sought by the subpoena – records which should have been delivered to my office quite some time ago.¹

¹ To the extent that one might interpret Jonathon Kanarek's email to Your Honor as a communicate being made by him on behalf of himself and Kirby Kanarek, is Mr. Kanarek representing to the Court that he is admitted to practice law in the State of New Jersey? Mr. Kanarek's alleged status as a "Wall Street" lawyer would not be sufficient for him to practice law in New Jersey without any license to do so.

Moreover, there is the matter of Lauren Kanarek's in-person deposition in New Jersey. Mr. Silver and I both are seeking an Order directing Lauren Kanarek to appear here in New Jersey, which is understandable given the evidence I presented demonstrating that Lauren has no issue being in public and interaction with people, in close physical contact, when it serves her purpose.

I respectfully request that the pending motions and cross-motions be decided by Your Honor because my client, for one, needs a record here in the event there is any need to take an appeal.

Very Truly Yours,
DEININGER & ASSOCIATES, LLP

A handwritten signature in black ink, appearing to read 'C. L. Deininger', written in a cursive style.

Christopher L. Deininger, Esq.

cc: All counsel of record (through eCourts)