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MORRIS COUNTY PROSECUTOR
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Attorney for non-party Morris County Prosecutor’s Office

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|---------------------------------|---|--|-------------------------------------|
| | : | | SUPERIOR COURT OF NEW JERSEY |
| LAUREN KANAREK, | : | | COUNTY OF MORRIS |
| Plaintiff, | : | | LAW DIVISION – CIVIL |
| | : | | |
| v. | : | | |
| | : | | DOCKET NO. MRS-L-2250-19 |
| MICHAEL BARISONE, SWEET, | : | | |
| GRASS FARMS, LLC, RUTH | : | | ORDER OF COURT |
| COX, et. al. | : | | |
| Defendant. | : | | |
| | : | | |

This matter having been opened to the Court by the non-party Morris County Prosecutor’s Office, Chief Assistant Prosecutor Christopher F. Schellhorn appearing, for an Order directing production of certain items from the Morris County Prosecutor’s Office investigative file pursuant to Defendant Sweet Grass Farm’s *Subpoena Duces Tecum*, and the Court having considered a letter submitted herein, and for good cause having been shown;

IT IS ON THIS ____ DAY OF _____, 2022, ORDERED that the non-party Morris County Prosecutor’s Office shall produce 81 audio files extracted from electronic devices recovered during the criminal investigation. Production of said audio files shall occur no later than 10 days from the date of This Order.

IT IS FURTHER ORDERED that the production of said audio files shall be consistent with the June 23, 2021 Confidentiality Stipulation and Protective Order previously entered by the Hon. William J. McGovern, III, J.S.C.

HON. LOUIS S. SCEUSI, J.S.C.



MORRIS COUNTY PROSECUTOR'S OFFICE

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Christoph K. Kimker
Chief of Detectives

June 13, 2022

Hon. Louis S. Sceusi, J.S.C.
Morris County Courthouse
Morristown, N.J. 07963
- via eCourts -

RE: Kanarek v. Barisone, et. al.
MRS-L-2250-19

Your Honor:

Please accept this letter requesting a Court Order directing production of certain items from the Morris County Prosecutor's investigative file, specifically 81 audio files, pursuant to a *subpoena duces tecum* from a party to the above-captioned matter, Sweet Grass Farms, LLC ("SGF").

In May 2022, after the trial of the parallel criminal matter, State v. Michael Barisone, Indictment No. 19-12-999-I, the Morris County Prosecutor's Office ("MCPO") produced over 30,000 pages of documentary materials, over 1,500 photos, and approximately 35 other items of media in compliance with SGF's *subpoena duces tecum*. The MCPO withheld production of privileged or protected materials.¹

The MCPO also withheld a number of other items that are not typically produced pursuant to civil subpoena, but indicated to SGF that the Prosecutor's Office would address any specific demands for such items on a case-by-case basis. Subsequently, Mark Silver, Esq., counsel for SGF, requested production of certain items, specifically, 81 audio files extracted from electronic devices recovered during the criminal investigation from the residence of Lauren Kanarek and/or from Robert Goodwin.² For reference and identification, a list of the specific audio files are attached to this letter as Exhibit A.

The State respectfully requests that This Court enter an Order directing production of these

¹ For example: work product; Division of Child Protection and Permanency (DCPP) records; grand jury materials; and/or search warrants and their accompanying papers.

² These audio files were previously provided to, Michael Barisone, a party to the instant civil matter, consistent with the criminal discovery rules.

audio files pursuant to SGF's *subpoena duces tecum*. By copy of this letter, the State gives notice to every civil party pursuant to the five day rule.

Sincerely,

/s/ christopher schellhorn

Christopher Schellhorn
Chief Assistant Prosecutor
Attorney ID# 001342009

cc: all parties to civil matter (via eCourts)
file

- Exhibit A -

1. "MCPO ITEM#3\R-00001_1908050621.MP3"
2. "MCPO ITEM#3\R-00002_1908050939.MP3"
3. "MCPO ITEM#3\R-00003_1908051439.MP3"
4. "MCPO ITEM#3\R-00004_1908051939.MP3"
5. "MCPO ITEM#3\R-00005_1908060039.MP3"
6. "MCPO ITEM#3\R-00006_1908060957.MP3"
7. "MCPO ITEM#3\R-00007_1908070037.MP3"
8. "MCPO ITEM#3\R-00008_1908070541.MP3"
9. "MCPO ITEM#3\R-00009_1908080119.MP3"
10. "MCPO ITEM#3\R-00010_1908080321.MP3"

11. "MCPO ITEM#5\R-00001_1908040943.MP3"
12. "MCPO ITEM#5\R-00002_1908040958.MP3"
13. "MCPO ITEM#5\R-00003_1908041043.MP3"
14. "MCPO ITEM#5\R-00004_1908041135.MP3"
15. "MCPO ITEM#5\R-00005_1908041144.MP3"
16. "MCPO ITEM#5\R-00006_1908041148.MP3"
17. "MCPO ITEM#5\R-00007_1908041152.MP3"
18. "MCPO ITEM#5\R-00008_1908041207.MP3"
19. "MCPO ITEM#5\R-00009_1908041220.MP3"
20. "MCPO ITEM#5\R-00010_1908041225.MP3"
21. "MCPO ITEM#5\R-00011_1908041236.MP3"
22. "MCPO ITEM#5\R-00012_1908041238.MP3"
23. "MCPO ITEM#5\R-00013_1908041243.MP3"
24. "MCPO ITEM#5\R-00014_1908041257.MP3"
25. "MCPO ITEM#5\R-00015_1908041317.MP3"
26. "MCPO ITEM#5\R-00016_1908041320.MP3"
27. "MCPO ITEM#5\R-00017_1908041324.MP3"
28. "MCPO ITEM#5\R-00018_1908041328.MP3"
29. "MCPO ITEM#5\R-00019_1908041337.MP3"
30. "MCPO ITEM#5\R-00020_1908041355.MP3"
31. "MCPO ITEM#5\R-00021_1908041415.MP3"
32. "MCPO ITEM#5\R-00022_1908041444.MP3"
33. "MCPO ITEM#5\R-00023_1908041448.MP3"
34. "MCPO ITEM#5\R-00024_1908041454.MP3"
35. "MCPO ITEM#5\R-00025_1908041459.MP3"
36. "MCPO ITEM#5\R-00026_1908041503.MP3"
37. "MCPO ITEM#5\R-00027_1908041505.MP3"
38. "MCPO ITEM#5\R-00028_1908041512.MP3"
39. "MCPO ITEM#5\R-00029_1908041523.MP3"
40. "MCPO ITEM#5\R-00030_1908041526.MP3"
41. "MCPO ITEM#5\R-00031_1908041529.MP3"
42. "MCPO ITEM#5\R-00032_1908041534.MP3"
43. "MCPO ITEM#5\R-00033_1908041544.MP3"
44. "MCPO ITEM#5\R-00034_1908041548.MP3"
45. "MCPO ITEM#5\R-00035_1908041551.MP3"

46. "MCPO ITEM#5\R-00036_1908041555.MP3"
47. "MCPO ITEM#5\R-00037_1908041600.MP3"
48. "MCPO ITEM#5\R-00038_1908041609.MP3"
49. "MCPO ITEM#5\R-00039_1908041615.MP3"
50. "MCPO ITEM#5\R-00040_1908041627.MP3"
51. "MCPO ITEM#5\R-00041_1908041635.MP3"
52. "MCPO ITEM#5\R-00042_1908041644.MP3"
53. "MCPO ITEM#5\R-00043_1908041650.MP3"
54. "MCPO ITEM#5\R-00044_1908041653.MP3"
55. "MCPO ITEM#5\R-00045_1908041656.MP3"
56. "MCPO ITEM#5\R-00046_1908041709.MP3"
57. "MCPO ITEM#5\R-00047_1908041726.MP3"
58. "MCPO ITEM#5\R-00048_1908041730.MP3"
59. "MCPO ITEM#5\R-00049_1908041735.MP3"
60. "MCPO ITEM#5\R-00050_1908041741.MP3"
61. "MCPO ITEM#5\R-00051_1908041749.MP3"
62. "MCPO ITEM#5\R-00052_1908041752.MP3"
63. "MCPO ITEM#5\R-00053_1908041754.MP3"
64. "MCPO ITEM#5\R-00054_1908041805.MP3"
65. "MCPO ITEM#5\R-00055_1908041809.MP3"
66. "MCPO ITEM#5\R-00056_1908041811.MP3"
67. "MCPO ITEM#5\R-00057_1908041816.MP3"
68. "MCPO ITEM#5\R-00058_1908041821.MP3"
69. "MCPO ITEM#5\R-00059_1908041828.MP3"
70. "MCPO ITEM#5\R-00060_1908041835.MP3"
71. "MCPO ITEM#5\R-00061_1908041850.MP3"
72. "MCPO ITEM#5\R-00062_1908041932.MP3"
73. "MCPO ITEM#5\R-00063_1908041936.MP3"
74. "MCPO ITEM#5\R-00064_1908041939.MP3"
75. "MCPO ITEM#5\R-00065_1908041942.MP3"
76. "MCPO ITEM#5\R-00066_1908042143.MP3"
77. "MCPO ITEM#5\R-00067_1908050252.MP3"
78. "MCPO ITEM#5\R-00068_1908060056.MP3"
79. "MCPO ITEM#5\R-00069_1908071107.MP3"
80. "MCPO ITEM#5\R-00070_1908071607.MP3"
81. "MCPO ITEM#5\R-00071_1908072107.MP3"