

|                         |   |                          |
|-------------------------|---|--------------------------|
| D.N. FST-FA17-5016797-S | : | SUPERIOR COURT           |
| JENNIFER DULOS          | : | J.D. OF STAMFORD/NORWALK |
| VS.                     | : | AT STAMFORD              |
| FOTIS DULOS             | : | DECEMBER 26, 2019        |

**PLAINTIFF'S MOTION FOR ATTORNEY'S FEES, PENDENTE LITE**

The Plaintiff, Jennifer Dulos, acting by and through her attorney, hereby files this Motion for Attorney Fees, Pendente Lite for the following reasons:

1. On or about Friday, May 24, 2019 the Plaintiff disappeared during the midst of a hotly contested battle with the Defendant concerning custody of the parties' minor children.
2. Counsel for the Plaintiff submits that the Defendant's legal and factual position regarding his then pending Motion seeking custody was in extremis on or about the date of the Plaintiff's disappearance.
3. In addition, the Defendant's relationship with his live in paramour was also in extremis.
4. After the disappearance of the Plaintiff under circumstances indicating that she was the victim of criminal actions by a person or persons not yet determined or publically named, the Defendant and his paramour, Michelle Traconis, were arrested and charged with Tampering with and Fabrication of Evidence and Hindering Prosecution in connection with the Plaintiff's disappearance – all of which are matters of public record in the above referenced Judicial District, and as to which the Court is requested to

take judicial notice.

5. As a result, counsel for the Plaintiff is charged with responsibility for defending the Plaintiff's interests in the above captioned action, in accordance with the Rules of Professional Conduct. See for example Rule 1.14, Connecticut Rules of Professional Conduct.

6. The Plaintiff's rights to custody of her children have not been terminated by a final decree.






7. However, because of the Plaintiff's disappearance, counsel for the Plaintiff is without a source for the payment of legal fees and costs attendant to the representation, defense and prosecution of the Plaintiff's interests in the above captioned action.

8. At present, there is already a balance due for legal services and costs incurred in connection with the prosecution and defense of the action for dissolution of marriage. The Defendant's action in recently filing a Motion to Dismiss will now lead to additional legal expenses being incurred by reasons of the Defendant's actions.

9. Thus, pursuant to Conn. Gen. Stat. 46b-62, counsel for the Plaintiff acting on behalf of the Plaintiff moves the Court to enter an order, making the Defendant liable for and awarding legal fees and costs to counsel for the Plaintiff. Such fees and costs are to be made payable to the Law Firm of Wayne D. Effron, P.C.

10. The Plaintiff also asserts that the Defendant is capable of paying the legal fees and costs of Plaintiff's counsel based upon the following:

- a. The Defendant has extensive real estate holdings and is the sole member of the Fore Group, LLC which also holds real property in its name;
- b. The Defendant is the beneficiary of a foreign trust believed to be based in the nation of Greece or some other foreign jurisdiction from which the legal fees and costs of Defendant's criminal cases and his defense and prosecution of civil litigation, with and against the executors of the Estate of Hilliard Farber. The nature and sources of such foreign trust are presently unknown to the Plaintiff's counsel, but based upon information developed prior to the disappearance of the Plaintiff, said monies could be money from the Defendant which are now being repatriated to the United States for the Defendant's use.
- c. The Defendant is presently involved in the following civil actions pending in the State of Connecticut<sup>1</sup> which are in addition to the above captioned action for divorce where the Defendant is represented by Attorney Rochlin:

|             |  |   |             |      |
|-------------|--|---|-------------|------|
| DULOS FOTIS | FARBER, GLORIA, EXECUTOR OF THE ESTATE OF HILLIARD v. FORE GROUP, INC. |  <a href="#">HHD-CV-18-6088970-S</a> | Hartford JD | D-02 |
| DULOS FOTIS | FARBER, GLORIA, EXECUTOR OF THE ESTATE OF HILLIARD v. DULOS, FOTIS     |  <a href="#">HHD-CV-18-6088971-S</a> | Hartford JD | D-01 |
| DULOS FOTIS | DEAN, MARK H., AS TRUSTEE OF THE CT RE 2019 TRUST v. DULOS, FOTIS      |  <a href="#">HHD-CV-19-6116846-S</a> | Hartford JD | D-01 |
| DULOS FOTIS | LAMIKANRA, OLADEJO v. DULOS, FOTIS                                     |  <a href="#">HHD-CV-16-6066527-S</a> | Hartford JD | D-01 |
| DULOS FOTIS | DULOS, JENNIFER v. DULOS, FOTIS  |  <a href="#">FST-FA-17-5016797-S</a> | Stamford    | D-01 |

<sup>1</sup> Obtained from the publically available case information from the State of Connecticut, Judicial Branch, "Case Look Up" website on December 26, 2019. Note that the civil action for foreclosure brought by the Savings Bank of Danbury has a return date of December 24, 2019.

|             |   |                     |                      |      |
|-------------|---|---------------------|----------------------|------|
| DULOS FOTIS | SAVINGS BANK OF DANBURY v. FORE GROUP. INC. | FST-CV-19-6044836-S | JD<br>Stamford<br>JD | D-02 |
|-------------|---|---------------------|----------------------|------|




d. In addition, the Defendant has retained and is represented by legal counsel in the following criminal actions<sup>2</sup>:

| Defendant (Last, First) | Birth Year | Court       | Next Activity/Status | Next Activity/Status Date | Docket No.  |
|-------------------------|------------|-------------|----------------------|---------------------------|---|
| DULOS FOTIS             | 1967       | Stamford JD | Pre-Trial            | 01/09/2020 10:00 AM       |  FST -CR19-0148554-T |
| DULOS FOTIS             | 1967       | Stamford JD | Pre-Trial            | 01/09/2020 10:00 AM       |  FST -CR19-0167343-T |

1

11. In both of the criminal cases the Defendant, Fotis Dulos, appears to be represented by Norman Pattis, Esq. as per information from the Judicial Website, which indicates that the Defendant is **“Represented By: 423934 PATTIS & S LLC”**, which is associated with FST-CR19-0148554-T.

12. The Defendant is also is represented by counsel with respect to the following proceedings before the Supreme Court of the State of Connecticut:

|             |                                     |  |                 |            |                    |
|-------------|-------------------------------------|--|-----------------|------------|--------------------|
| FOTIS DULOS | STATE OF CONNECTICUT v FOTIS DULOS  |  <u>Mot SC 190077</u> | FSTCR190148554T | 09/25/2019 | Granted            |
| FOTIS DULOS | STATE OF CONNECTICUT v FOTIS DULOS  |  <u>Mot SC 190089</u> | FSTCR190148554T | 10/01/2019 | Denied             |
| FOTIS DULOS | STATE OF CONNECTICUT v. FOTIS DULOS |  <u>SC 20363</u>      | FSTCR190148554T | 10/07/2019 | Argued/No Decision |

wherein he is represented by Norman Alexander Pattis, Juris # 408681 of Pattis & Smith, LLC, Juris #

<sup>2</sup> Obtained from the publically available case information from the State of Connecticut, Judicial Branch, “Criminal Defendant

423934.

13. In addition, Plaintiff's counsel asserts that the Defendant has retained a private investigator, other counsel and/or other persons and businesses to aid him in connection with the above referenced legal proceedings.

14. Counsel for the Plaintiff also asserts that the Defendant may be using his personal assets and those of the Fore Group, LLC or other sources to which he has access (e.g. the foreign trust claimed to be established for his benefit) for his expenses and uses.

15. Thus, the Defendant may also be depleting or dissipating marital assets in violation of the automatic orders and the doctrine of *Finan v. Finan*, 287 Conn. 491 (2008) and *Gershman v. Gershman*, 286 Conn.341 (2008).

16. Counsel for the Plaintiff will seeks to take appropriate depositions and discovery in order to not only respond to the Defendant's Motion to Dismiss (which appears to be non-jurisdictional in nature); but to also prepare for and prosecute this Motion for Attorney's Fees and to respond to any additional actions by the Defendant with respect to this case.

**WHEREFORE**, for any one or more of the foregoing reasons counsel for the Plaintiff moves the Court to award attorney's fees and all costs to the Law Firm of Wayne D. Effron, P.C. for purposes of defending against his Motion to Dismiss dated December 26, 2019, and for all subsequent proceedings in

---

Case Look Up" website on December 26, 2019.

this Court, which he may subsequently bring in connection with the action for dissolution of marriage or the juvenile court actions. In addition, the Plaintiff seeks such other orders which at law or in equity appertain, and which are concomitant to the relief sought on behalf of the Plaintiff in this motion.

THE PLAINTIFF JENNIFER DULOS,

BY: 

Reuben S. Midler, Esq. (Juris # 037824)

Law Office of Wayne D. Efron, P.C.

Juris #100106

2 Greenwich Office Park, 2<sup>nd</sup> Floor West

P. O. Box 5237

Greenwich, Connecticut 06831-0504

Tel: (203) 622-1160

Fax: (203) 622-4004

e-mail: [effronlaw@effronlaw.com](mailto:effronlaw@effronlaw.com)

**CERTIFICATION**

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on December 26, 2019 to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served.

**Defendant Fotis Dulos**

**c/o Norman A. Pattis, Esq.**

Pattis & Smith, LLC

383 Orange Street, 1<sup>st</sup> Floor

New Haven, CT 06511

E-mail: npattis@pattisandsmith.com

**Defendant Fotis Dulos**

**c/o Richard A. Rochlin, Esq.**

Rich Rochlin Law Group

10 North Main Street, Suite 304

West Hartford, CT 06107

E-mail: rich@trllplaw.com

**Intervenor Gloria Farber**

**c/o Anne C. Dranginis, Esq.**

Pullman & Comley, LLC

90 State House Square

Hartford, CT 06103-3702

E-mail: adranginis@pullcom.com

**Guardian Ad Litem Michael T. Meehan, Esq.**

Meehan Law, LLC

76 Lyon Terrace

Bridgeport, CT 06604

E-mail: mtm@meehanlaw.com

**Non-Party Witness Guillaume Vidallet**

**c/o Alexander J. Cuda, Esq.**

Needle & Cuda  
830 Post Road East, Suite 101  
Westport, CT 06880  
E-mail: alex@needlecuda.com

**Non-Party Witness Renbrook School**  
c/o Sarah Gruber, Esq.  
Murtha Cullina, LLP  
City Place I, 29<sup>th</sup> Floor  
185 Asylum Street  
Hartford, CT 06103  
E-mail: sgruber@murthalaw.com

**Non-Party Witness Suzanne Morin**  
c/o Edward J. Gavin, Esq.  
1087 Broad Street, 1<sup>st</sup> Floor Left  
Bridgeport, CT 06604  
E-mail: ed@edgavinlaw.com

**Non-Party Witness Joseph C. Urbanski, CPA**  
c/o Bradley M. Smolkin, Esq.  
Morrison Mahoney LLP  
One Constitution Plaza, 10th Floor  
Hartford, CT 06103  
E-mail: bsmolkin@morrisonmahoney.com

I further certify that the original of this document is a true copy of the document electronically filed with the Superior Court of the above-captioned Judicial District.



Reuben S. Midler, Esq. (Juris #037824)  
Commissioner of the Superior Court