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| D.N. FBT-FA-19-6088163-S |) | SUPERIOR COURT |
| CHRISTOPHER AMBROSE |) | J.D. OF FAIRFIELD |
| v. |) | AT BRIDGEPORT/RFTD |
| KAREN AMBROSE |) | APRIL 12, 2021 |

**PLAINTIFF'S MOTION FOR CONTEMPT RE: COMPUTER DISCOVERY ORDER, PENDENTE
LITE**

The Plaintiff respectfully represents the following:

1. This matter was returnable to the court on August 13, 2019.
2. Trial in this matter commenced on March 31, 2021.
3. On April 6, 2021 this Court (Adelman, J.) issued an order requiring the Defendant to provide her computer to a Discovery Special Master (herein DSM) no later than 6:00 p.m. on April 7, 2021. The Order is clear and unambiguous. The Order states in relevant part the following:

The court will appoint a discovery special master (DSM) to receive the defendant's computer. The DSM shall have the computer sent to an individual company who has expertise to analyze the computer...

Counsel have agreed upon Attorney John Mager [as DSM].

4. The Court issued a ruling from the bench as to the date and time that the computer was to be produced (Adelman, J.). That portion of the order was clear and unambiguous.
5. The Defendant failed to comply with the court Order. She has not provided her computer to the court appointed DSM.
6. The Defendant has willfully and intentionally violated the April 6th, 2021 Order and should be found in contempt.
7. As a result of the Defendant's failure to comply with the Order, Plaintiff

respectfully requests, pursuant to Connecticut Practice Book §13-14 (3), that the Court enter an order establishing the following facts:

- a. That the Defendant contacted her children in violation of the court order dated June 10, 2020 (Code #196, Grossman, J.);
- b. That the Defendant made an attempt to harass or threaten a witness/es; and
- c. That the Defendant disclosed information regarding the custody evaluation performed by Dr. Biren Caverly, in violation of the court dated October 3, 2019 (Code # 133 and #133.10, Grossman, J.).

WHEREFORE, the Plaintiff respectfully requests:

1. That the Court find the Defendant in contempt for her willful and intentional violation of the Court's April 6, 2021 court order regarding discovery;
2. That the Court establish the Plaintiff's claims for which discovery was sought;
3. That the Court be allowed to establish an adverse inference to the claims made by the Plaintiff based her violation of said discovery orders.
4. That the Court order the Defendant to pay reasonable attorney's fees and costs in connection with the prosecution of this motion; and
5. That the Court make such further orders as it deems fair and equitable.

THE PLAINTIFF

BY: _____


Nancy Aldrich, Esq.
Aldrich & Aldrich
152 King's Highway North
Westport, CT 06880
Telephone: 203-221-0055
Juris No. 409128

ORDER

The foregoing motion having been duly presented and heard, it is hereby

ORDERED: GRANTED/DENIED;

And it is further ORDERED:

BY THE COURT