

DOCKET NO. HHD-FA16-6071228-S : SUPERIOR COURT
SAKON, FRANCELIA : J.D. OF HARTFORD
VS. : AT HARTFORD
SAKON, JOHN A. : DECEMBER 29, 2021

MOTION TO QUASH AND FOR A PROTECTIVE ORDER

The Plaintiff, Francelia Sevin, FKA, Francelia Sakon, pursuant to Practice Book Section 13-5 and 13-28, and related statutory authority, respectfully moves this court to enter orders quashing the “Subpoena *Duces Tecum*” issued by the Defendant for the Plaintiff and Mr. Dennis O’Toole, and to enter orders protecting the Plaintiff and Mr. Dennis O’Toole from having to provide testimony and the documents requested on January 4, 2022, at trial. As reasons therefore, the Plaintiff submits the following:


1. Judgment in this matter entered on April 3, 2018 (Prestley, J.). At such time, proceedings regarding custody/parenting were bifurcated for further orders, which remain pending.
2. On December 22, 2021, the Defendant issued Subpoenas for Ms. Francelia Sevin and Mr. Dennis O’Toole indicating an intention to have the witnesses testify to and provide documentation regarding their personal finances and any financial arrangements with third parties. The Plaintiff moves to quash said Subpoenas.
3. The Defendant has included an expansive and burdensome discovery request seeking voluminous financial disclosures, including the financial information of alleged third parties who hold an interest in this matter.

4. The Defendant's request for voluminous financial records is frivolous and irrelevant to the proceeding at hand.

5. The only issues pending before the Court involve custody and parenting.

WHEREFORE, for the foregoing reasons, Ms. Francelia Sevin, is requesting that this Court quash the Subpoenas and enter a protective order protecting her and Mr. Dennis O'Toole from having to produce documents in this matter, in addition to any other relief that the court deems just and equitable.

**THE PLAINTIFF,
FRANCELIA SEVIN**

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ORDER

The foregoing Motion having been heard, it is hereby ORDERED:

GRANTED / DENIED

It is further ORDERED:

By the COURT,

JUDGE / CLERK

CERTIFICATION OF SERVICE

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on December 29, 2021, 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 who were or will immediately be electronically served.

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