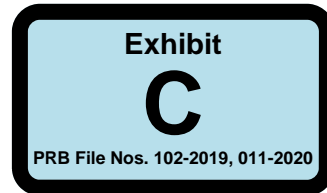


Dalene Sacco

From: Alexander, Jon <Jon.Alexander@vermont.gov>
Sent: Friday, June 30, 2023 4:49 PM
To: Kaveh Shahi
Cc: Navah C. Spero; Dalene Sacco; charlotte dennett; abachand
Subject: RE: Alibozek v. Watts



Hi Kaveh-

I wanted to let you know that I believe we will only be withholding from production in response to your subpoena just a few emails (about 3 or 4) that reflect SDC Spero's protected work product, but I have not yet been able to connect with Navah to confirm that today. Therefore, I'd ask for a few more days to provide you with descriptions of the emails we will withhold, in whole or in part, on work product grounds.

There are several hundred other emails and other documents responsive to the subpoena, however, that Charlotte may deem to reflect her work product or that of her clients the Alibozeks. Charlotte is now reviewing the documents and will be making a determination as to which of these documents, if any, she will assert work product protection and whether to file a motion for protective order with respect to the subpoena production.

I will leave it to you and Charlotte to negotiate a timeline for her privilege assertions and filing of any motion for protective order before we produce anything.

Let me know if that's acceptable approach.

Thanks and Happy 4th, Jon

VERMONT
JUDICIARY 

Jon T. Alexander
Disciplinary Counsel, Professional Responsibility Program
Costello Courthouse, 32 Cherry Street, Suite 213
Burlington, VT 05401
(802) 859-3001 office
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From: Alexander, Jon
Sent: Wednesday, June 7, 2023 11:03 AM
To: Kaveh Shahi <kss@clearyshahi.com>
Cc: Navah C. Spero <nspero@gravelshea.com>; Dalene Sacco <das@clearyshahi.com>; charlotte dennett <chardennettlaw@gmail.com>
Subject: RE: Alibozek v. Watts

Hi Kaveh-

Thanks for speaking to me yesterday afternoon and agreeing to extend our date to respond to your 5/18 subpoena to SDC Spero until 6/30. Specifically, we agreed that by 6/30 I'll serve on behalf of SDC Spero and myself as Disciplinary Counsel written objections to the subpoena, per VRCP 45(c)(2)(B), as well as a log describing responsive