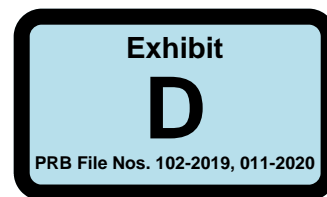


## Dalene Sacco

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**From:** Kaveh Shahi  
**Sent:** Friday, June 30, 2023 5:26 PM  
**To:** Alexander, Jon  
**Cc:** Navah C. Spero; Dalene Sacco; charlotte dennett; abachand  
**Subject:** Re: Alibozek v. Watts



Hi Jon,

I am good with your request for a few more days to check on the handful of emails you may withhold as Navah's work product. I trust you will give me a privilege log and I can evaluate. However you have no standing to raise a work product objection for someone else such as Charlotte. If she gave your office her work product, its waived. You need to produce those emails per the agreed to deadline.

Have a good 4th.

Don't Get Outlook for Android

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**From:** Alexander, Jon <Jon.Alexander@vermont.gov>  
**Sent:** Friday, June 30, 2023 4:48:52 PM  
**To:** Kaveh Shahi <kss@clearyshahi.com>  
**Cc:** Navah C. Spero <nspero@gravelshea.com>; Dalene Sacco <das@clearyshahi.com>; charlotte dennett <chardennettlaw@gmail.com>; abachand <abachand@gravelshea.com>  
**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 4<sup>th</sup>, Jon