


1. Email from Gary Alibozek [hereinafter GA] to Navah Spero [hereinafter NS] dated 5/7/20;
2. Email from Sharyn Alibozek [SA] to NS dated 5/29/21;
3. Email from GA to NS, dated 8/18/21;
4. Email from GA to NS dated 8/23/21;
5. Email from GA to NS dated 9/7/21;
6. Email from GA to NS dated 11/15/21;
7. Email from GA to NS dated 1/11/23 ;
8. Email from Charlotte Dennett [CD] to NS dated 2/14/22;
9. Email from CD to NS dated 3/18/22;
10. Memo from CD to NS [No. 61a] dated 11/19/22;
11. Email from CD to NS dated 3/7/23;
12. Email from CD to NS dated 5/15/23;
13. Email from Charlotte Dennett CD to GA dated 6/19/23;
14. Email from CD to Alyssa Bachand dated 6/1/23;
15. Email from CD to NS dated 6/14/23

WHEREFORE, Plaintiff respectfully requests the court to grant his Motion for Protective Order.

(S.D.N.Y. June 26, 2023) (“Although Respondent may not challenge the third-party subpoena ‘on grounds of relevance or burden, a subpoena served on a non-party,’ may be challenged by a party on the basis of privilege”) (citation omitted).

DATED in Burlington this 7th day of July 2023

By 
Charlotte Dennett, attorney for the Plaintiff

STATE OF VERMONT

SUPERIOR COURT
 Windsor Unit

) CIVIL DIVISION
)
) Docket No. 22-CV-00493
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Gary Alibozek
 Plaintiff,

v.

Norman E. Watts and Watts Law Firm, P.C.
 Defendants

Plaintiff's Amended Motion for a Protective Order

Now comes Gary Alibozek, by and through his attorney, Charlotte Dennett, and moves this court to grant a Protective Order, pursuant to V.R.C.P. 26 (c) in response to Defendant's Subpoena dated 5/18/23 for "all communications, including but not limited to emails, text messages...and other documents to/from Gary Alibozek, Sharyn Alibozek, and/or Charlotte Dennett originally sent to Navah C. Spero, Esq. Disciplinary Counsel in the matter In re; Norman Watts, Esq. PRB File No. 102-219, 011-2020.


Plaintiff seeks to protect the following documents on the basis of attorney's work product:

| Document | DATE | Description |
|--|-----------------|---------------------------|
| 1. Email from Sharyn Alibozek [SA] to NS | dated 5/29/21; | Deposition discussion |
| 2. Email from GA to NS, | dated 8/18/21; | Litigation strategy |
| 3. Email from GA to NS | dated 8/23/21; | Analysis of Alibozek v GE |
| 4. Email from GA to NS | dated 9/7/21; | Analysis of Alibozek v GE |
| 5. Email from GA to NS | dated 11/15/21; | Conflict of Interest |
| 6. Emails from GA to NS | dated 1/11/23 ; | PRB analysis |

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|---|-------------------------|
| 7. Email from Dennett [CD] to NS dated 2/14/22; | Herb Ogden, expert |
| 8. Email from CD to NS dated 3/18/22; | Insurance matters |
| 9. Memo from CD to NS dated 11/19/21 | Conflict of interest |
| 10. Email from CD to Alyssa Bachand dated 3/7/23; | Count II of complaint |
| 11. Email from CD to NS dated 5/15/23; | Analysis of NS motion |
| 12. Email from CD to GA dated 6/19/23; | email production |
| 13. Email from CD to Alyssa Bachand dated 6/1/23; | work product |
| 14. Email from CD to NS dated 6/14/23 | post-trial observations |

WHEREFORE, Plaintiff respectfully requests the court to grant his Motion for Protective Order.

DATED in Burlington this 17th day of July 2023

By 
Charlotte Dennett, attorney for the Plaintiff