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08:15 PM, 05 Oct, 2025
U.S.D.C., Eastern District of New York

Attention: Magistrate Judge Pollak

October 5th, 2025

Via Email to: zdean@kohnswift.com

Attorneys of Kohn, Swift & Graft, P.C
1600 Market Street, Suite 2500
Philadelphia, Pennsylvania 19103-7225
(215) 238 – 1700

Re: *Edmondson et al. v. Raniere et al.*, C.A. No. 20-cv-00485

NOTICE OF FAILURE TO RESPONSE TO DISCOVERY

Dear Ms. Dean,

Your answer to my discovery request are deficient and in fact they are not answers, but mainly objections and an effort to avoid compliance with the discovery obligation of the Plaintiffs. In addition, you use the fact that I am not an attorney as a method to avoid the obligation to provide discovery. Your answer showed that you were aware that one of the documents that I prepared and titled SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFFS¹ was in fact a request for both interrogatories and documents in which I asked the question and immediately asked for the production of documents related to the interrogatory thereafter. Instead you construed it not as a request for production, but as a request to answer interrogatories and more importantly never answered the interrogatories. Instead you raised a

number of objections that are only applicable if the aim of the request was document production ONLY. Under the rules and practice that I have learned researching and questioning attorneys, I can make requests to answer interrogatories and request all documents related to those questions. I am giving you 5 days to fully answer what was stated in my Second request for document production which in fact should have been titled REQUEST FOR ANSWER TO INTERROGATORIES in which I request also the production of documents related to each interrogatory. Failure to provide answers and documents within 5 days of the receipt of this letter will result in my filing a motion to strike the allegations of the complaint and/or compel answer to the questions.

Be guided accordingly,

A handwritten signature in black ink, appearing to read 'Danielle Roberts', with a stylized flourish extending to the right.

Danielle Roberts, DO, MS