

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

 MALDEN PUBLIC SCHOOLS)
)
 v.)
)
 SUPERVISOR OF RECORDS,)
 SECRETARY OF THE)
 COMMONWEALTH, and)
 BRUCE FRIEDMAN)
 _____)

MIDDLESEX SUPERIOR COURT
DOCKET NO.: 2181-CV-01458

RECEIVED

04/05/24

PLAINTIFF’S NOTICE OF AUDIOVISUAL DEPOSITION DUCES TECUM

Plaintiff Bruce Friedman of Malden, MA (“Defendant”) hereby notifies Malden Public Schools (“Plaintiffs”) of a recorded audiovisual deposition, duces tecum:

DEPONENT: Shirley Dorai, RAO, Malden Public Schools (“MPS”)

DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.

LOCATION: To be determined.

Defendant Friedman will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Defendant Friedman prefers the recorded audiovisual deposition be taken remotely. Defendant Friedman is open to arranging a date and time that is most compatible with the Plaintiffs and the Deponents schedules.

Pursuant to the Massachusetts Civil Procedure Rule 34, Plaintiff Friedman provides notice of subpoena duces tecum upon the Deponent seeking the following materials as designated for production at or before the recorded audiovisual deposition.

DOCUMENT PRODUCTION NO.1: Please produce all documents and records, including Electronically Stored Information such as email and/or text messages (“ESI”) which demonstrate that exactly 60,940 (Sixty Thousand, Nine Hundred and Forty) emails are responsive to the Defendants public records request of September 24, 2020, regarding Mr. Michael Wood.

DOCUMENT PRODUCTION NO.2: Please produce all documents and records, including Electronically Stored Information such as email and/or text messages (“ESI”) which demonstrate that exactly 20,840 (Twenty Thousand, Eight Hundred and Forty) emails are responsive to the Defendants public records request of September 24, 2020, regarding Mr. Elizabeth Cushinsky.

DOCUMENT PRODUCTION NO.3: Please produce all documents and records, including Electronically Stored Information such as email and/or text messages (“ESI”) which demonstrate that the Malden Public Schools were closed on Friday September 25, 2020, and on Friday, October 2, 2020.

DOCUMENT PRODUCTION NO.4: Please produce all documents and records, including Electronically Stored Information such as email and/or text messages (“ESI”) which demonstrate that the City of Malden were closed on Friday September 25, 2020, and on Friday, October 2, 2020.

DOCUMENT PRODUCTION NO.5: Please produce all documents and records, including Electronically Stored Information such as email and/or text messages (“ESI”) which demonstrate or contain the Queries passed to the electronic mail system and the results of said queries regarding DOCUMENT PRODUCTION 1 and DOCUMENT PRODUCTION 2 above.

DOCUMENT PRODUCTION NO.6: Please produce all documents and records, including Electronically Stored Information such as email and/or text messages (“ESI”) which demonstrate or contain any communications between the deponent

and any other person regarding the public records requests described in
DOCUMENT PRODUCTION 1 and DOCUMENT PRODUCTION 2 above.

Respectfully Submitted by Plaintiff

Dated: April 5th, 2024

/s/ Bruce Friedman .
Bruce Friedman – Pro-Se
8 Marvin Street
Malden, MA. 02148
(617) 952-3183
bruce@amyandbruce.com

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the counsel for the Malden Public Schools, at fvasudevan@mhtl.com and to counsel for the Defendants Supervisor of Records and Secretary of the Commonwealth at cassandra.bolanos@mass.gov electronically via email and by email sent by the undersigned and through efile and serve.

Dated: April 5th, 2024

/s/ Bruce Friedman .
Bruce Friedman – Pro-Se

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PLAINTIFF’S NOTICE OF AUDIOVISUAL DEPOSITION DUCES TECUM

Plaintiff Bruce Friedman of Malden, MA (“Defendant”) hereby notifies Malden Public Schools (“Plaintiffs”) of a recorded audiovisual deposition, duces tecum:

DEPONENT: Anthony Rodrigues, Director of IT, City of Malden & Malden Public Schools (“MPS”)

DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.

LOCATION: To be determined.

Defendant Friedman will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Defendant Friedman prefers the recorded audiovisual deposition be taken remotely. Defendant Friedman is open to arranging a date and time that is most compatible with the Plaintiffs and the Deponents schedules.

Pursuant to the Massachusetts Civil Procedure Rule 34, Plaintiff Friedman provides notice of subpoena duces tecum upon the Deponent seeking the following materials as designated for production at or before the recorded audiovisual deposition.

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Respectfully Submitted by Plaintiff

Dated: April 5th, 2024

/s/ Bruce Friedman .
Bruce Friedman – Pro-Se
8 Marvin Street
Malden, MA. 02148
(617) 952-3183
bruce@amyandbruce.com

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Dated: April 5th, 2024

/s/ Bruce Friedman .
Bruce Friedman – Pro-Se

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PLAINTIFF’S NOTICE OF AUDIOVISUAL DEPOSITION DUCES TECUM

Plaintiff Bruce Friedman of Malden, MA (“Defendant”) hereby notifies Malden Public Schools (“Plaintiffs”) of a recorded audiovisual deposition, duces tecum:

DEPONENT: Ligia Noriega-Murphy, Superintendent, Malden Public Schools (“MPS”)

DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.

LOCATION: To be determined.

Defendant Friedman will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Defendant Friedman prefers the recorded audiovisual deposition be taken remotely. Defendant Friedman is open to arranging a date and time that is most compatible with the Plaintiffs and the Deponents schedules.

Pursuant to the Massachusetts Civil Procedure Rule 34, Plaintiff Friedman provides notice of subpoena duces tecum upon the Deponent seeking the following materials as designated for production at or before the recorded audiovisual deposition.

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DOCUMENT PRODUCTION 1 and DOCUMENT PRODUCTION 2 above.

Respectfully Submitted by Plaintiff

Dated: April 5th, 2024

/s/ Bruce Friedman .
Bruce Friedman – Pro-Se
8 Marvin Street
Malden, MA. 02148
(617) 952-3183
bruce@amyandbruce.com

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Dated: April 5th, 2024

/s/ Bruce Friedman .
Bruce Friedman – Pro-Se

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PLAINTIFF’S NOTICE OF AUDIOVISUAL DEPOSITION

Plaintiff Bruce Friedman of Malden, MA (“Defendant”) hereby notifies Malden Public Schools (“Plaintiffs”) of a recorded audiovisual deposition, duces tecum:

DEPONENT: Michael Wood, Former Assistant Superintendent, Malden Public Schools (“MPS”)

DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.

LOCATION: To be determined.

Defendant Friedman will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Defendant Friedman prefers the recorded audiovisual deposition be taken remotely. Defendant Friedman is open to arranging a date and time that is most compatible with the Plaintiffs and the Deponents schedules.

Respectfully Submitted by Plaintiff

Dated: April 5th, 2024

/s/ Bruce Friedman .

Bruce Friedman – Pro-Se
8 Marvin Street
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PLAINTIFF’S NOTICE OF AUDIOVISUAL DEPOSITION

Plaintiff Bruce Friedman of Malden, MA (“Defendant”) hereby notifies Malden Public Schools (“Plaintiffs”) of a recorded audiovisual deposition, duces tecum:

DEPONENT: Elizabeth Cushinsky, Former Special Education Director, Malden Public Schools (“MPS”)

DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.

LOCATION: To be determined.

Defendant Friedman will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Defendant Friedman prefers the recorded audiovisual deposition be taken remotely. Defendant Friedman is open to arranging a date and time that is most compatible with the Plaintiffs and the Deponents schedules.

Respectfully Submitted by Plaintiff

Dated: April 5th, 2024

/s/ Bruce Friedman .

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Plaintiff Bruce Friedman of Malden, MA (“Defendant”) hereby notifies Malden Public Schools (“Plaintiffs”) of a recorded audiovisual deposition, duces tecum:

DEPONENT: John Oteri, Former Superintendent, Malden Public Schools
 (“MPS”)

DATE and TIME: To be determined; not before 30 days and not after 90 days
 from the date of this notice.

LOCATION: To be determined.

Defendant Friedman will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Defendant Friedman prefers the recorded audiovisual deposition be taken remotely. Defendant Friedman is open to arranging a date and time that is most compatible with the Plaintiffs and the Deponents schedules.

Respectfully Submitted by Plaintiff

Dated: April 5th, 2024

/s/ Bruce Friedman .

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