

The Estate also requests that, after production of these records, attorney Mahoney be required to give further 30(b)(6) deposition testimony about these subjects and the relevant records.

As further grounds for this motion, the Estate refers to its accompanying memorandum in support.

January 19, 2023

Respectfully submitted,

/s/ Daniel L. McFadden

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LOCAL RULE 7.1 AND 37.1 STATEMENT

I hereby certify that Attorney DeSousa (for the City) and attorney McFadden (for the Estate) conducted a Rule 7.1 and 37.1 conference on this issue by telephone for about 15 minutes on December 27, 2022. After further correspondence by email, the City provided its final position on January 7, 2023. The City opposes this motion. Additionally, the Estate understands that attorney Vigliotti has asserted privilege over certain of the records at issue on behalf of a non-party, as further explained in the accompanying memorandum,

Dated: January 19, 2023

/s/ Daniel L. McFadden
Daniel L. McFadden