

DOCKET NO.: WWM-CV-21-5012142-S : SUPERIOR COURT
JANE DOE : J.D. OF WINDHAM
V. : AT PUTNAM
HYDE SCHOOL AT SOUTH WOODSTOCK, INC. : JULY 13, 2023
and HYDE SCHOOL

MOTION FOR COMMISSION OF OUT-OF-STATE DEPOSITION

Defendants, Hyde School at South Woodstock, Inc. and Hyde School, pursuant to Section 13-28(a) of the Connecticut Practice Book and Connecticut General Statutes Sections 52-148a and 52-148c, hereby request that this court approve the appointment of a commissioner to administer oath, issue subpoena, and take testimony outside the State of Connecticut for use in the above-captioned action. Defendants are seeking to depose Robert Lagrutta, a fact witness. Said deposition will be taken and transcribed by a competent court reporting authority in the State of Massachusetts. The commission shall include the power to issue subpoenas pursuant to the laws of the State of Massachusetts to require the presence of witnesses and the production of documents and tangible things.

In support of this Motion, Defendants represent as follows:

This case involves an alleged sexual assault that occurred at the Hyde School summer camp in or about 2005. Mr. Lagrutta is the plaintiff's former boyfriend.

300-0371

As such, the plaintiff may have discussed details of the alleged incident with Mr. Lagrutta which are germane to the case.

WHEREFORE, Defendants respectfully request that this honorable court approve the attached Order and Commission appointing Sharon M. Baldwin, Esq. or other designated attorney and a competent court reporting authority as Commissioner.

DEFENDANTS,
HYDE SCHOOL AT SOUTH WOODSTOCK, INC.
and HYDE SCHOOL

By _____
Sharon M. Baldwin of
David G. Hill & Associates, LLC
Their Attorneys

CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on this 13th day of July, 2023, to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery.

Name and address of each party and attorney that copy was or will immediately be mailed or delivered to:

Garrett M. Moore, Sr.
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Sharon M. Baldwin

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ORDER APPOINTING COMMISSIONER TO CONDUCT DISCOVERY

The Defendant in the above-entitled matter has moved for an appointment of Commissioner to take the deposition of Robert Lagrutta, the plaintiff's former boyfriend. Said deposition will occur on _____, 2023, or on date(s) mutually agreed to by the parties.

IT IS HEREBY ORDERED that Sharon M. Baldwin, Esq., or any other qualified attorney within the firm of David G. Hill & Associates, LLC is hereby appointed as a Commissioner to take the deposition of the aforementioned individual and entity. Said Commissioner shall arrange to have said deposition transcribed by any court reporter or notary public authorized to transcribe depositions in the State of Massachusetts. Further, said competent Massachusetts court reporting authority shall also be appointed as a Commissioner to administer oaths and take testimony for use in this action.

The Court,

Dated: _____