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Representing Witness
Jeff Katofsky

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF MICHIGAN

National Labor Relations Board Plaintiffs, vs. Park Avenue Investment Advisors, LLC., et al. Defendants.	Civil Action No.: 14-1669 WITNESS JEFF KATOFSKY'S RESPONSE TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION OR OBJECTS, OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

Jeff Katofsky, a witness in the above-referenced action, hereby responds to Plaintiff's Subpoena Duces Tecum pursuant to FRCP 45, as follows:

1. All such documents will have been produced by email.

2. This request violates responding party's rights of privacy. Further, this request is irrelevant and not calculated to lead to the discovery of admissible evidence and the request is burdensome and harassing to responding party.

DATED: October 15, 2017

By:_____
Jeff Katofsky, Esq.

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 4558 Sherman Oaks Avenue, Sherman Oaks, CA 91403.

On October 15, 2017 on the foregoing document described as WITNESS JEFF KATOFSKY'S RESPONSE TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION OR OBJECTS, OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION on the interested parties herein by placing a true copy thereof in a sealed envelope and personally delivering such to the parties, as follows:

Dean Owens, Esq.
NLRB
1015 Half Street, S.E., 4th Floor
Washington, D.C. 20003

Also served by email dean.owens@nlrb.gov

I declare under penalty of perjury under the laws of the United States that I am employed by a Member of the Bar of this Court at whose direction this service was made. Executed this 15th day of October, 2017 at Sherman Oaks, CA.

Judith Groves