

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JAMES ROSENCRANZ,	)	
Plaintiff,	)	
	)	
v.	)	1:14-cv-13050-JGD
	)	
JAMES A. FREEMAN,	)	
Defendant.	)	

**EMERGENCY MOTION OF NON-PARTY, MIIA PROPERTY AND CASUALTY
GROUP, INC., TO QUASH SUBPOENA AND FOR A PROTECTIVE ORDER**

Pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, MIIA Property and Casualty Group, Inc. (“MIIA”) hereby moves this honorable court for an order to quash the subpoena served upon it by the Plaintiff, James Rosencranz (“Plaintiff”), and for a protective order.

As explained more fully in the accompanying memorandum of law, the subpoena issued to MIIA should be quashed because it (1) seeks documents that are neither admissible nor reasonably calculated to lead to the discovery of admissible evidence, (2) seeks documents available either from the defendant or from public sources, and (3) subjects MIIA, a non-party, to undue and unnecessary burden. In addition, a protective order should issue barring any further discovery regarding the claims and training information sought by the Plaintiff in the subject subpoena, including any testimony regarding said claims and training information.

Accordingly, MIIA respectfully requests that the Court GRANT this motion to quash the subpoena issued to it by the Plaintiff, and issue the requested protective order. MIIA further requests that it be awarded its costs in opposing the Plaintiff’s subpoena.

REQUEST FOR ORAL ARGUMENT

MIIA hereby requests a hearing on this Motion to Quash and for a Protective Order.

Date: June 12, 2015

Respectfully submitted,
MIIA Property and Casualty Group, Inc.,
A non-party,
By its attorneys,

/s/ Deawn C. Takahashi

Arthur E. Maravelis (BBO#564673)
Deawn C. Takahashi (BBO#657282)
TANG & MARAVELIS, P.C.
50 Mall Road, Suite 111
Burlington, MA 01803
(781) 221-1400

Certificate of Service

I hereby certify that a true copy of the above document was served upon Plaintiff by forwarding same via ECF on June 12, 2015.

/s/ Deawn C. Takahashi

Deawn C. Takahashi