

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF PUTNAM

RICHARD QUAGLIETTA,

Plaintiff,

NOTICE TO INSPECT

- against -

Index No. 500144-18

STEVEN MACKAY,

Defendant.

SIRS:

PLEASE TAKE NOTICE that pursuant to Rule 3120 and Section 3101 of the Civil Practice Law and Rules, the defendant is hereby required to produce at the law offices of GEORGE J. CALCAGNINI, 376 Route 202, Somers, New York, on the 10th day of April, 2019, at 10:00 o'clock in the forenoon of that day, for the purpose of the plaintiff, or his attorney inspecting and making copies thereof, by means of a photo-copy machine, the following items:

1. The defendant's cell phone that he was using the evening of December 22, 2017 at the Quiet Man Restaurant in Peekskill, New York.
2. All e-mails and text messages received by the defendant on December 22, 2017 between the hours of 6:00 p.m. and 11:00 p.m. that evening.
3. All e-mails and text messages read by the defendant on December 22, 2017 between the hours of 6:00 p.m. and 11:00 p.m. that evening regardless of when the e-mail or text message was sent to him.
4. The defendant's cell phone number or numbers in use as of December 22, 2017;
5. The name, address and account number for defendant's cellular phone service as of December 22, 2017;

6. The defendant's cell phone bill or bills covering the date of December 22, 2017;
7. The defendant's e-mail address or addresses in use as of December 22, 2017;
8. An authorization to permit the plaintiff's attorney to obtain from defendant's cell phone service provider all records cell phone calls and text messages received or sent from the defendant's cell phone or phones on December 27, 2017; and
9. An authorization to permit the plaintiff's attorney to obtain from defendant's internet service provider all e-mails received or sent from by the defendant on December 27, 2017

In the alternative, copies of the requested cell phone, documents and/or information may be mailed to the undersigned prior to the above mentioned date.

Dated: March 20, 2019



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