

1 SUPREME COURT OF THE STATE OF NEW YORK
2 COUNTY OF KINGS

3 _____ x
RICHARD C. LITMAN,
Plaintiff,

-against-

JOSHUA B. GOLDBERG,
Defendant.

Index No. 524343/2025

4 _____ x
5
6 **PLAINTIFF RICHARD C. LITMAN'S RESPONSES TO DEFENDANT**
7 **JOSHUA B. GOLDBERG'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

8 **To:**

9 Connell Foley LLP
10 Attn: Aaron H. Gould, Esq. / Leo J. Hurley, Jr., Esq.
11 185 Hudson Street, Suite 2510
12 Jersey City, NJ 07311
13 Attorneys for Defendant Joshua B. Goldberg

14 Plaintiff, Richard C. Litman ("Plaintiff"), appearing pro se, submits these reservations,
15 objections, and responses to the First Request for Production of Documents served by Defendant
16 Joshua B. Goldberg ("Defendant") in the above-referenced action. Plaintiff expressly reserves the
17 right to amend, expand, or supplement any part of the objections, reservations, and responses
18 stated herein.

19 **GENERAL OBJECTIONS**

- 20 1. Plaintiff objects to each Request to the extent that it purports to impose obligations beyond
21 those imposed by the CPLR or other applicable law.
- 22 2. Plaintiff objects to each Request to the extent that it purports to request the identification and
23 disclosure of information or documents that were prepared in anticipation of litigation,
24 constitute attorney work-product, reveal privileged communications, or are otherwise
25 protected from disclosure. Plaintiff hereby asserts all such applicable privileges and
26 protections.
- 27 3. Plaintiff objects to each Request to the extent it seeks discovery regarding causes of action that
28 were dismissed by the Court's December 5, 2025 Order. Plaintiff's responses and document
29 productions herein are limited strictly to the surviving claim under NY Civil Rights Law §§
30 50-51.
- 31 4. Plaintiff objects to each Request to the extent it demands the production of public information
32 that is equally accessible to Defendant.

1 **7. All documents relating to or referenced within the Complaint.**

2 **Response:** Plaintiff objects to this request on the grounds that it is overbroad and seeks
3 documents already in Defendant's possession or filed publicly on the Court docket. Subject to
4 this objection, Plaintiff refers Defendant to the documents previously filed as Exhibits to the
5 pleadings in this matter. Plaintiff will produce any additional non-privileged documents
6 specifically referenced in the surviving Count of the Second Amended Complaint upon
7 which Plaintiff intends to rely.

8 **8. All correspondence and/or written communications between you and any other**
9 **individual related to the subject matter of this litigation.**

10 **Response:** Plaintiff objects to this request on the grounds that it is overbroad, vague, unduly
11 burdensome, ambiguous, unanswerable in the current form, and not reasonably calculated to
12 lead to the discovery of relevant and admissible evidence. Plaintiff further objects to this
13 request to the extent that it seeks the production of documents protected by the attorney-
14 client privilege, the work-product doctrine, or any other privilege (including communications
15 prepared in anticipation of litigation). Subject to these objections, Plaintiff will produce non-
16 privileged communications upon which Plaintiff intends to rely.

17 **9. All documents relating to the subject matter of this litigation.**

18 **Response:** Plaintiff objects to this request on the grounds that it is facially overbroad, vague,
19 unduly burdensome, ambiguous, unlimited in scope, not proportional to the needs of the case,
20 and not reasonably calculated to lead to the discovery of relevant and admissible evidence.
21 Subject to these objections and without waiving them, Plaintiff will produce non-privileged
22 documents relevant to the remaining NY Civil Rights Law §§ 50-51 claim upon which
23 Plaintiff intends to rely.

24 Dated: March 14, 2026

25 Brooklyn, New York

26 /s/Richard C. Litman

27 Richard C. Litman

28 Plaintiff Pro Se

29 459 Vanderbilt Avenue

30 Brooklyn, NY 11238

31 relitman@gmail.com

32 703-409-8850

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3 **VERIFICATION**

4 I, Richard C. Litman, am the Plaintiff in the above-captioned action. I have read the foregoing
5 Plaintiff Richard C. Litman's Responses to Defendant Joshua B. Goldberg's First Request for
6 Production of Documents and know the contents thereof. The same are true to my own
7 knowledge, except as to matters therein stated to be alleged on information and belief, and as to
8 those matters I believe them to be true.

9 Dated: March 16, 2026
10 Brooklyn, New York

11 /s/Richard C. Litman

12 _____
13 Richard C. Litman

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15 **CERTIFICATE OF SERVICE**

16
17 I hereby certify that on March 16, 2026, I served a true copy of the foregoing Plaintiff Richard C.
18 Litman's Responses to Defendant Joshua B. Goldberg's First Request for Production of
19 Documents upon counsel for Defendant by electronic mail as follows:

20
21
22 Connell Foley LLP
23 Attn: Aaron H. Gould, Esq. / Leo J. Hurley, Jr., Esq.
24 185 Hudson Street, Suite 2510
25 Jersey City, NJ 07311
26 Attorneys for Defendant Joshua B. Goldberg

27
28 /s/ Richard C. Litman

29 _____
30 Richard C. Litman
31 459 Vanderbilt Avenue
32 Brooklyn, NY 11238
33 rclitman@gmail.com
34 703-409-8850