

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PROVIDENCE, SC. SUPERIOR COURT

JOHANNA HARRIS,

Plaintiff,

v.

**JEFFREY DANA, in his capacity as
City Solicitor of the City of Providence;
JORGE O. ELORZA, in his capacity as
Mayor of the City of Providence;
SAMUEL D. ZURIER, in his capacity
as Chairman of the Committee on
Claims and Pending Suits, Providence
City Council; and JAMES J.
LOMBARDI III, in his capacity as
Treasurer of the City of Providence,
Defendants.**

Case No. PC-2015-3821

**PLAINTIFF'S OBJECTION TO DEFENDANTS' MOTION TO QUASH
AND MOTION FOR PROTECTIVE ORDER**

1. On February 16, 2016, Defendants moved to quash the deposition subpoena that Plaintiff Johanna Harris has recently served upon Ms. Serena Conley, License Administrator, City of Providence, and to seek a protective order permanently barring her deposition. Plaintiff hereby objects.

2. Ms. Conley indeed has unique and superior knowledge of the facts at issue in this case.

3. Defendants have denied that they remained passive while Peter Petrarca attempted repeatedly to interfere with Ms. Harris' authorized duties as a commissioner of the Board of Licenses ("the Board"). Ms. Conley, as License Administrator, was present at virtually every meeting of the Board during which Mr. Petrarca engaged in his attacks.

4. Ms. Conley failed to notify the Rhode Island Ethics Commission that Ms. Harris, as a newly appointed commissioner of the Board, was subject to the Code of Ethics.

5. Defendants have requested a jury trial. Plaintiff has the right to assess the knowledge and credibility of an individual who has played a key role during Plaintiff's tenure on the Board of Licenses, and who will undoubtedly be called as a witness at trial.

6. Defendants assert, "There is no mention of Ms. Conley's name in Plaintiff's Petition, in which she carefully details many interactions with various City officials." This assertion is demonstrably false. Plaintiff's initial Petition of September 1, 2015, her amended Petition of September 7, 2015, and her Memorandum of Law of October 30, 2015 all specifically state that the Licensing Administrator failed to report Ms. Harris' name to the Ethics Commission. All of her petitions specifically cite subsequent correspondence between the Licensing Administrator and the Ethics Commission. See ¶24 of *Memorandum of Law*, October 30, 2015.

Respectfully submitted,



JOHANNA HARRIS 2/18/2016
PO Box 9483
Providence, Rhode Island 02940

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2016, I filed and served this document through the Superior Court's Odyssey File and Serve electronic filing system on Defendants Jeffrey Dana, Jorge O. Elorza, Samuel D. Zurier and James J. Lombardi III and their attorney Dennis E. Carley, Roberts, Carroll, Feldstein & Peirce Inc., decarley@rcfp.com.

PLAINTIFF, PRO SE,



JOHANNA HARRIS
PO Box 9483
Providence, Rhode Island 02940