

# Pre-Motion Discovery Request

## Pre-Motion Good-Faith Discovery Request — *Rosenwald v. Rosenwald*, FST-FA26-6078292-S

**To:** Jill Heitler Blomberg, Esq. — jblomberg@sgbfamilylaw.com **Cc:** Molly C. Miller, Esq. — mmiller@sgbfamilylaw.com; Natassia M. Fodor, Esq. — nfodor@sgbfamilylaw.com; Rachel Palmer (paralegal) — rpalmer@sgbfamilylaw.com **From:** Abraham Rosenwald, *pro se* — aberosenwald@icloud.com **Date:** May 24, 2026 **Re:** Pre-Motion Good-Faith Discovery Request Pursuant to Practice Book § 13-14(a); Voluntary Production Requested in Advance of Any Further Motion Practice; Companion to Defendant's May 19, 2026 Memorandum on Dalton / RCM / JBR IV Trust Valuation (Docket Entry forthcoming)

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Counselor,

This email is sent in the spirit of Connecticut Practice Book § 13-14(a) — which conditions any motion for an order compelling discovery on a prior good-faith attempt to resolve the underlying dispute informally — and Practice Book § 25-32 (Mandatory Disclosure and Production in Family Matters) read together with §§ 13-2 (Production of Documents), 13-6 (Interrogatories), and 13-9 (Request for Production). The Defendant is making a single, surgical, pre-motion request, in writing, before approaching the Court again on discovery.

The Defendant has, on the record, requested the documents enumerated below — in substance — at multiple points during the pendency of this proceeding. The May 19, 2026 Memorandum on Valuation of the Plaintiff's Beneficial Interest in Dalton Investments Through the JBR IV Trust and Rosenwald Capital Management, Inc., and on the Fraudulent-Transfer Character of the July 1, 2019 Ownership Restructure, lays out the categories in detail, with full citation to public-record sources (SEC Form ADV, SEDI, Glass House Listing Statement, ICIJ Paradise Papers, NY Stern faculty bio, House Oversight Committee released emails, etc.). This email reduces the May 19 memorandum's universe to a single enumerated production list, organized by category, with a thirty (30) day voluntary-production deadline.

It is the Defendant's good-faith position that the categories below are (a) automatic disclosures under Practice Book § 25-32, (b) implicated by the Plaintiff's sworn May 6, 2026 Financial Affidavit and the firm's prior representations on the record, and (c) materially under-produced as of the date of this email. Voluntary production within the deadline below resolves the dispute. Non-production triggers a Practice Book § 13-14 motion to compel and, where appropriate, a § 13-15 sanctions motion — and the Court's record will reflect that the Defendant first asked for the documents informally, in writing, before approaching the bench.

*Put your money where your mouth is.* If the Plaintiff's representations on the record are true, the documents below exist and are easily produced. If the documents do not exist, that fact is itself a discoverable answer. If the documents exist but the Plaintiff declines to produce them, the Defendant will know that, too.

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## **ENUMERATED PRODUCTION CATEGORIES**

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### **A. JBR IV Trust — corpus, distributions, and 2019 restructure**

1. The James B. Rosenwald IV Trust (the "JBR IV Trust") trust instrument as currently in effect, together with every prior amendment, addendum, restatement, and consent.
2. A complete enumeration of the JBR IV Trust corpus as of (i) August 25, 2019 (date of marriage), (ii) December 31 of each calendar year 2019–2025, and (iii) the most recent reasonable date.
3. All trustee resolutions, written consents, certifications, and minutes from January 1, 2018 to present, including but not limited to those relating to the July 1, 2019 Dalton ownership restructure.
4. All distributions of any kind (cash, in-kind, deemed, constructive) from the JBR IV Trust to the Plaintiff, the Plaintiff's spouse, the Plaintiff's children, or any third party for the Plaintiff's benefit, from January 1, 2019 to present.
5. All Form 1041 (Income Tax Return for Trusts) federal and state filings, including all K-1s issued by the JBR IV Trust to any beneficiary, for tax years 2018 through 2025.

### **B. Dalton Investments LLC and Dalton Investments, Inc.**

1. Schedule A and Schedule B of the most recent Form ADV for each entity, together with every amendment thereto from January 1, 2019 to present (these are public; production confirms operative ownership chain).
2. All operating agreements, shareholder agreements, voting agreements, and side letters governing the ownership of, or distributions from, Dalton Investments LLC (CRD 109538) and Dalton Investments, Inc. (CRD 308609), and every amendment thereto, from January 1, 2019 to present.
3. All Walking Rock Corp. and Walking Rock Nevada, Inc. ownership, transfer, and distribution records relating to the 2019 restructure and the 2024 Nevada migration.
4. All distributions of any kind (cash, in-kind, deemed, constructive, carry, management-fee, profit-share) from either Dalton entity to the JBR IV Trust, Rosenwald Capital Management, Inc., the Rosenwald Family Trust, the Plaintiff, or any related party of the Plaintiff, from January 1, 2019 to present.

5. All Form K-1s, capital-account statements, and partnership-tax workpapers relating to the Plaintiff's, the JBR IV Trust's, or any Rosenwald-affiliated entity's interest in either Dalton entity, for tax years 2018 through 2025.

### **C. Rosenwald Capital Management, Inc. (RCM)**

1. All certificates of formation, shareholder ledgers, stock transfer ledgers, and amendments thereto for Rosenwald Capital Management, Inc. (CRD 290118), from January 1, 1997 (formation) to present.
2. All board resolutions, shareholder consents, and written-action records relating to the issuance, transfer, redemption, or reclassification of any RCM equity interest at any point.
3. All distributions of any kind from RCM to the JBR IV Trust, the Rosenwald Family Trust, or any Rosenwald-affiliated entity, from January 1, 2019 to present.

### **D. The 2019 Ownership Restructure (fifty-five (55) days pre-wedding)**

1. All documents — including drafts, correspondence, term sheets, fairness opinions, valuation reports, tax-counsel memoranda, and post-closing certifications — relating to the July 1, 2019 restructure that erased thirteen (13) consecutive years of disclosed JBR IV Trust ownership in a single SEC Form ADV amendment.
2. All Walking Rock Corp., Walking Rock Nevada, Inc., and Gobe International, Inc. records relating to the same restructure.
3. All Connecticut Uniform Voidable Transactions Act (CGS § 52-552a et seq.) analyses, advice memoranda, or opinions of counsel relating to the 2019 restructure or any successor restructure.

### **E. Kings Bay Investment Company Limited (Cayman) — NEW PRODUCTION CATEGORY**

1. The Kings Bay Investment Company Limited memorandum and articles of association, every amendment thereto, every shareholders' register entry, and every directors' resolution, from formation through the date of production.
2. Identification, by name, of each of the seven (7) reported owners of Kings Bay (per Form ADV Schedule D Section 7.A) and the percentage held by each.
3. All Plaintiff, JBR IV Trust, RCM, Rosenwald Family Trust, JBR III, or Plaintiff-related-entity interests in Kings Bay (direct or beneficial), from formation to present.
4. All Kings Bay audit reports (Cayman PricewaterhouseCoopers, PCAOB #1266), capital-account statements, NAV reports, and distribution records.

## **F. 1937 GP LLC, 1937 LP, JMBO Fund Ltd, and adjacent Dalton-named entities**

1. All organizational documents, partnership agreements, side letters, and amendments for 1937 GP LLC, 1937 LP, JMBO Fund Ltd (Cayman), NAVF Select LLC (CIK 1878477), NAVF Select (Offshore Fund) Ltd (Cayman), Pacrim GP LLC, and any other Dalton-related fund vehicle in which the Plaintiff, the JBR IV Trust, RCM, the Rosenwald Family Trust, or any Plaintiff-related entity holds (or held during the marital period) a direct or beneficial interest.
2. All Plaintiff-side ownership, distribution, capital-account, and K-1 records for each entity in paragraph 21.

## **G. Glass House Brands Inc. (Cboe Canada: GLAS / OTC: GLASF)**

1. All Plaintiff, JBR IV Trust, RCM, Rosenwald Family Trust, JBR III, and Plaintiff-related-entity securities holdings in Glass House Brands Inc., from inception to present, including all classes of equity (Common, Multiple Voting, Restricted Voting, etc.), the voting power attached to each, and all transfers.
2. All SEDI (Canadian System for Electronic Disclosure by Insiders) filings made by the Plaintiff, JBR IV, or any Plaintiff-related entity in respect of Glass House Brands.
3. All proxies, voting agreements, joint-acting agreements, lock-up agreements, and related-party-transaction disclosures involving the Plaintiff or any Plaintiff-related entity and Glass House Brands.

## **H. Beach Front Property Management, Inc. / Beach Front Properties LLC**

1. All operating documents, ownership records, and distributions for Beach Front Property Management, Inc. and Beach Front Properties LLC, from January 1, 2019 to present, to the extent any Plaintiff-side beneficial interest exists.

## **I. Persky Financial Management, Inc.; Gobe International, Inc.; Iradnafla LLC; Mercer Park Brand L.P.**

1. All documents establishing the Plaintiff's, the JBR IV Trust's, RCM's, or any Plaintiff-related entity's direct or beneficial interest (or absence thereof) in each of: Persky Financial Management, Inc.; Gobe International, Inc.; Iradnafla LLC; Mercer Park Brand L.P.

## **J. Tax returns, K-1s, gift-tax returns, and FBAR / FinCEN 114 filings**

1. The Plaintiff's federal and Connecticut individual income tax returns (Form 1040 / CT-1040), with all schedules, attachments, and K-1s, for tax years 2018 through 2025.
2. The Plaintiff's federal gift tax returns (Form 709), if any, for tax years 2018 through 2025.
3. All FBAR (FinCEN Form 114) filings made by the Plaintiff or any Plaintiff-related entity (including the JBR IV Trust) reporting foreign financial accounts, for calendar years 2018 through 2025.
4. All Form 5471, Form 8865, Form 8938, and Form 3520 / 3520-A filings made by the Plaintiff or any Plaintiff-related entity for the same period.

## **K. Banking, brokerage, custody, and prime-broker statements**

1. All monthly account statements, year-end summaries, and 1099s for every bank, brokerage, custody, and prime-broker account in which the Plaintiff, the JBR IV Trust, RCM, the Rosenwald Family Trust, or any Plaintiff-related entity held funds at any point from January 1, 2019 to present.

## **L. Sworn-statement reconciliation**

1. A reconciliation, line-by-line, between the assets and income disclosed on the Plaintiff's May 6, 2026 sworn Financial Affidavit and the production responsive to paragraphs A through K above, identifying every item on the Affidavit and showing where in the production each is documented (or, if undocumented, why).

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## **DEADLINE AND PROCEDURAL POSTURE**

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Voluntary production, in PDF or native-format electronic delivery to **aberosenwald@icloud.com** (with courtesy cc to **aberosenwald@proton.me** for redundancy), is requested by **5:00 p.m. EDT on Friday, June 13, 2026** — twenty (20) calendar days from the date of this email.

If production is not complete by that date, the Defendant will file a Motion to Compel under Practice Book § 13-14, attaching this email as the § 13-14(a) good-faith-attempt-to-resolve exhibit, and will additionally consider a § 13-15 sanctions motion together with a § 13-16 protective-order motion (in respect of any Plaintiff-side overbroad confidentiality demand on the produced material).

If, in the alternative, the firm represents in writing that any subset of the categories above does not exist, or that the Plaintiff has no responsive documents, that representation itself

becomes a discoverable answer under § 25-33 (continuing duty to disclose) and will be treated by the Defendant as a sworn position for the purposes of subsequent motion practice.

If the firm wishes to negotiate scope, format, custodian, or scheduling on any category, the Defendant is available for a meet-and-confer telephone call on any business day during the production window, with twenty-four (24) hours' notice, and welcomes a written counter-proposal. The Defendant is not asking the Plaintiff to admit anything not already on the record. The Defendant is asking for the documents the Plaintiff's own sworn affidavit and the public Form ADV imply must exist.

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## **A WORD ON POSTURE**

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This email is not a press release. It is not part of the Open Letter v2 publication track. It is the operational meet-and-confer that the Practice Book requires before motion practice. The Defendant is electing to do this in writing — and to do it before, not after, filing — so that the record reflects exactly that the Defendant attempted, in good faith, to resolve the production gap informally before invoking the Court's coercive authority. That posture is required by Rule 13-14(a). It is also, in the Defendant's judgment, the correct one.

The Defendant looks forward to receipt of the production, or to a written counter-proposal, within the deadline.

Cordially,

**Abraham Rosenwald** *Pro Se Defendant* 1127 High Ridge Road, Suite 151 Stamford, CT 06905 (203) 391-1041 aberosenwald@icloud.com

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*Doc ID: AR-LTR-20260524-SGB-PMDR · Companion to AR-MEM-20260519-DALTON-RCM-MARITAL-VALUATION · Citations to Practice Book §§ 13-2, 13-6, 13-9, 13-14(a), 13-15, 13-16, 25-32, 25-33. Sealed under ELARIA Constituted Seal v1 (sibling SVG / JSON artifacts produced concurrently).*