

Supplemental Resume

Practice Experience & Performance

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I. Motion Practice

- A. Regular Motion Calendar Experience and Appearances
 - 1. Experience in Discovery Motion Preparation and Presentation [*i.e. Motions to Compel, etc.*]
 - 2. Experience in Order Drafting, Negotiation, Promotion
- B. Formal-Special Cause Motion Calendar Experience and Appearances
 - 1. Experience in TRO-Injunctive Motion Preparation and Presentation

II. Trial Practice – RI District and Superior Court

- A. Ongoing Experience In:
 - 1. Pretrial Motions and Conferences
 - 2. Pleading Drafting, Analysis & Response
 - 3. Discovery [*including interrogatory, deposition and special requests*] Drafting, Analysis & Response
 - 4. Witness Preparation [*including expert witnesses*]
 - 5. Evidence Exhibit Preparation and Promotion
 - 6. Trial Motions, Objection and Response
 - 7. Direct and Cross-Examination
 - 8. Opening & Closing Statements
 - 9. Jury Selection and Instruction Matters
 - 10. Post Trial Matters

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III. **Arbitration Matters & Practice – RI District and Superior Court**

IV. **Administrative –Regulatory Practice**

A. Included Areas and Experience (representative agencies and entities):

1. Local Zoning, City Planning & Subdivision Matters
2. RI Coastal Regulatory Management Counsel
3. RI Public Utilities Commission – RI Department of Public Utilities and Carriers
4. RI Division of Taxation
5. RI Department of Business Regulation
6. RI Department of Environmental Management
7. RI Division of Purchasing

V. **Federal IRS Practice**

A. Included Areas and Experience (representative issues):

1. 941 Matters
2. Return Audits
3. Deduction Appeals
4. Penalty Abatement