

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6

Eric Riselvato, Plaintiff Shelley Riselvato's former husband.

My original response named Mr. Riselvato and his three children together and stated that I could not say with certainty which of them it was. That answer was imprecise. I have never spoken with Mr. Riselvato's children about this or any other subject. Mr. Riselvato alone made the statement to me, and he attributed it to his three children.

The circumstances were as follows.

In 2013, after I learned that Mr. Riselvato and Plaintiff Riselvato had divorced, I telephoned him. It was a single telephone conversation. During that call Mr. Riselvato told me that his three children, who had lived in the same household with Plaintiff Riselvato for several years, had heard that Plaintiff Riselvato received a mental health diagnosis during her marriage to Mr. Riselvato which she was not treating. He described it as an alleged diagnosis. He did not identify which of his children had said it, and he did not say when they said it.

Mr. Riselvato was reluctant to say more. He told me he was concerned about repercussions if Plaintiff Riselvato learned that he had spoken with me. He did not elaborate further and I did not press him.

That single telephone call in 2013 is the entirety of my knowledge on this subject and the entirety of my source for it. I have no notes, correspondence, or other records of that call, and I have not spoken with Mr. Riselvato about this matter since.

I identify Mr. Riselvato as the person who made the statement to me. I do not represent that the statement is accurate, and I have no independent knowledge of any diagnosis of Plaintiff Riselvato.

VERIFICATION

I, John Gunn, being first duly sworn, say that I have read the foregoing Supplemental Responses to Plaintiffs' Interrogatories Nos. 4 and 6 and know the contents thereof, and that the same are true to my own knowledge, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.