

# EXHIBIT E

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and John Cate

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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D. MICHAEL JEWETT,

Civil Action No.: 04-CV-1454 (JCL)(MF)

Plaintiff,

v.

IDT CORPORATION; et al.,

Defendant.

**ANSWERS AND OBJECTIONS TO  
PLAINTIFF D. MICHAEL JEWETT'S  
CEPA AND LAD INTERROGATORIES TO  
HOWARD JONAS**

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TO: William Perniciaro, Esq.  
84 New Dorp Plaza  
Staten Island, NY 10306  
Attorney for Plaintiff D. Michael Jewett

COUNSEL:

In accordance with Rule 33 of the Federal Rules of Civil Procedure, and Local Civil Rule 33.1 of the Rules of the United States District Court for the District of New Jersey, defendant Howard Jonas ("Jonas"), hereby objects and responds to plaintiff D. Michael Jewett's ("Jewett" or "Plaintiff") CEPA and LAD Interrogatories as follows:

**GENERAL OBJECTIONS**

1. Jonas objects to any interrogatory insofar as it attempts to impose upon him any obligations beyond those established by Federal Rules of Civil Procedure. Jonas will answer Plaintiff's interrogatories in accordance with those Rules and will not provide answers to the extent such answers would exceed the requirements of those Rules.

2. Jonas objects to the Interrogatories to the extent that they call for a legal conclusion or seek documents or information which are protected from disclosure by the attorney/client privilege or any other privilege recognized by statute, at common law, or by the Federal Rules of Civil Procedure, or which constitute or reflect attorney work product.

3. Jonas objects to any interrogatory that is not relevant to the subject matter of this action or is not reasonably calculated to lead to the discovery of admissible evidence.

4. Jonas objects to any interrogatory that is overly broad, unduly burdensome, vague or ambiguous.

**ANSWERS TO INTERROGATORIES**

Subject to the General Objections set forth above, Jonas responds to the Interrogatories as set forth below. In making these responses, Jonas does not waive any objections as to relevance, materiality or admissibility of evidence in this action or any other action or proceeding. Jonas

reserves the right at any time to revise, correct, add to or clarify any of the responses set forth herein, consistent with Rule 26(e) of the Federal Rules of Civil Procedure.

**ANSWER TO THE CEPA INTERROGATORIES**

**INTERROGATORY NO. 1:**

DESCRIBE all OBJECTIONS as to the propriety, lawful or UNLAWFUL nature of the TELECO HAITI DEAL, COMMUNICATED to you, by any PERSON (including the PLAINTIFF).

**ANSWER:**

Jonas objects to Request No. 1 on the grounds that it is overly broad; seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence; seeks personal and confidential information of non-parties; and may, depending on its ultimate interpretation, seek information protected by the attorney-client privilege and/or work product doctrine. Jonas further objects to the extent the question seeks information regarding persons other than Plaintiff as overbroad and not likely to lead to admissible evidence as to Plaintiff's CEPA claim. Subject to and without waiving any objection, Jonas responds as follows: None, no one communicated any objections to me about the Teleco Haiti Deal. With regard to Mr. Jewett specifically, I did not even know who Mr. Jewett was until after he sued me and I was served with the Complaint.

**INTERROGATORY NO. 2:**

DESCRIBE your knowledge of, and participation in, if any, the decision to TERMINATE plaintiff's EMPLOYMENT at IDT.

**ANSWER:**

Jonas responds as follows: None. I did not even know who Mr. Jewett was until after he sued me and I was served with the Complaint.

**INTERROGATORY NO. 3:**

DESCRIBE your knowledge of all COMMUNICATIONS between you and other PERSONS (including the PLAINTIFF) RELATING to such TERMINATION of PLAINTIFF'S EMPLOYMENT at IDT including COMMUNICATIONS RELATING to UNSATISFACTORY WORK PERFORMANCE.

**ANSWER:**

Jonas objects to Request No. 3 on the grounds that it is vague and ambiguous; is unduly burdensome and overly broad; seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence; and may, depending on its ultimate interpretation, seek information protected by the attorney-client privilege and/or work product doctrine. Subject to and without waiving any objection, Jonas responds as follows: With the exception of attorney-client communications concerning the defense of this lawsuit, I have had no communications relating to the termination or unsatisfactory work performance of Mr. Jewett. I did not even know who Mr. Jewett was until after he sued me and I was served with the Complaint.

**INTERROGATORY NO. 4:**

DESCRIBE your KNOWLEDGE of all COMMUNICATIONS by PERSONS other than yourself RELATING to the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

Jonas objects to Request No. 4 on the grounds that it is unduly burdensome and overly broad; vague and ambiguous in its request for Mr. Jonas' knowledge of communications by persons other than Mr. Jonas; may, depending on its ultimate interpretation, seek information protected by the attorney-client privilege and/or work product doctrine; and seeks information not within the personal knowledge or information of Jonas. Subject to and without waiving any

objection, Jonas responds as follows: I am unaware of any communications by other persons relating to the decision to terminate Mr. Jewett.

**INTERROGATORY NO. 5:**

DESCRIBE the PERSON or PERSONS who ordered the TERMINATION of PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

Jonas objects to Request No. 5 on the grounds that it is vague and ambiguous in the use of the term "ordered"; and seeks information not within the personal knowledge or information of Jonas. Subject to and without waiving any objection, to the extent this Interrogatory seeks a description of the person or persons who made the decision to terminate Mr. Jewett, Jonas responds as follows: I do not know who made the decision to terminate Mr. Jewett's employment. I was not involved in that decision, had no knowledge of the decision, and, in fact, did not even know who Mr. Jewett was or that he had worked at IDT until after he sued me and I was served with the Complaint.

**INTERROGATORY NO. 6:**

DESCRIBE the PERSON or PERSONS who informed the PLAINTIFF of the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

Jonas objects to Request No. 6 on the grounds that it is vague and ambiguous; seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence; may, depending on its ultimate interpretation, seek information protected by the attorney-client privilege and/or work product doctrine; and seeks information not within

the personal knowledge or information of Jonas. Subject to and without waiving any objection, Jonas responds as follows: I do not know who informed Mr. Jewett of the decision to terminate his employment.

**INTERROGATORY NO. 7:**

IDENTIFY any PERSON or PERSONS who were present during the time that anyone informed PLAINTIFF of the decision to TERMINATE his EMPLOYMENT.

**ANSWER:**

Jonas objects to Request No. 7 on the grounds that it is overly broad; vague and ambiguous; seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence; and seeks information not within the personal knowledge or information of Jonas. Subject to and without waiving any objection, Jonas responds as follows: I am unaware who informed Mr. Jewett of his termination or who was present at the time Mr. Jewett was informed of his termination.

**INTERROGATORY NO. 8:**

DESCRIBE and IDENTIFY all DOCUMENTS RELATING to the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

Jonas objects to Request No. 8 on the grounds that it is vague and ambiguous; overly broad; seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence; may, depending on its ultimate interpretation, seek information protected by the attorney-client privilege and/or work product doctrine; and seeks information not within the personal knowledge or information of Jonas. Subject to and without

waiving any objection, Jonas responds as follows: I am unaware of any documents relating to the decision to terminate Mr. Jewett's employment, have not seen any such documents, if they do exist, and do not have any such documents in my custody or control.

**INTERROGATORY NO. 9:**

DESCRIBE and IDENTIFY all DOCUMENTS relied upon RELATING TO the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

Jonas objects to Request No. 9 on the grounds that it is vague and ambiguous; overly broad; seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence; may, depending on its ultimate interpretation, seek information protected by the attorney-client privilege and/or work product doctrine; and seeks information not within the personal knowledge or information of Jonas. Subject to and without waiving any objection, Jonas responds as follows: I was not in any way involved in the decision to terminate Mr. Jewett, am unaware of whether any documents were relied upon in the decision to terminate Mr. Jewett, have not seen any such documents, if they do exist, and do not have any such documents in my custody and control.

**INTERROGATORY NO. 10:**

DESCRIBE and IDENTIFY all PERSONS who provided any information relied upon in the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

Jonas objects to Request No. 10 on the grounds that it is vague and ambiguous; may, depending on its ultimate interpretation, seek information protected by the attorney-client



privilege and/or work product doctrine; and seeks information not within the personal knowledge or information of Jonas. Subject to and without waiving any objection, Jonas responds as follows: I was not involved in the decision to terminate Mr. Jewett and have no knowledge as to whether anyone provided any information relied upon in the decision to terminate Mr. Jewett.

**ANSWERS TO THE LAD INTERROGATORIES**

**INTERROGATORY NO. 11:**

DESCRIBE all OBJECTIONS as to the propriety, lawful or UNLAWFUL nature of RELIGIOUS MATTERS at IDT, COMMUNICATED to you by any PERSON (including the PLAINTIFF).

**ANSWER:**

Jonas objects to Request No. 11 on the grounds that it is overly broad; seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence; and seeks personal and confidential information of non-parties. Jonas further objects to the extent the question seeks information regarding persons other than Plaintiff as overbroad and not likely to lead to admissible evidence as to Plaintiff's LAD claim. Subject to and without waiving any objection, Jonas responds as follows: None, no one communicated any objections to me about religious matters at IDT. With regard to Mr. Jewett specifically, I did not even know who Mr. Jewett was until after he sued me and I was served with the Complaint.

**INTERROGATORY NO. 12:**

DESCRIBE your knowledge of, and participation in, if any, the decision to TERMINATE plaintiff's EMPLOYMENT at IDT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 2, which is incorporated herein by reference.

**INTERROGATORY NO. 13:**

DESCRIBE your knowledge of all COMMUNICATIONS between you and other PERSONS (including the PLAINTIFF) RELATING to such TERMINATION of PLAINTIFF'S EMPLOYMENT at IDT including COMMUNICATIONS RELATING to UNSATISFACTORY WORK PERFORMANCE.

**ANSWER:**

See Jonas' answer to Interrogatory No. 3, which is incorporated herein by reference.

**INTERROGATORY NO. 14:**

DESCRIBE your KNOWLEDGE of all COMMUNICATIONS by PERSONS other than yourself RELATING to the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 4, which is incorporated herein by reference.

**INTERROGATORY NO. 15:**

DESCRIBE the PERSON or PERSONS who ordered the TERMINATION of PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 5, which is incorporated herein by reference.

**INTERROGATORY NO. 16:**

DESCRIBE the PERSON or PERSONS who informed the PLAINTIFF of the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 6, which is incorporated herein by reference.

**INTERROGATORY NO. 17:**

IDENTIFY any PERSON or PERSONS who were present during the time that anyone informed PLAINTIFF of the decision to TERMINATE is EMPLOYMENT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 7, which is incorporated herein by reference.

**INTERROGATORY NO. 18:**

DESCRIBE and IDENTIFY all DOCUMENTS RELATING to the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 8, which is incorporated herein by reference.

**INTERROGATORY NO. 19:**

DESCRIBE and IDENTIFY all DOCUMENTS relied upon RELATING TO the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 9, which is incorporated herein by reference.

**INTERROGATORY NO. 20:**

DESCRIBE and IDENTIFY all PERSONS who provided any information relied upon in the decision to TERMINATE PLAINTIFF'S EMPLOYMENT.

**ANSWER:**

See Jonas' answer to Interrogatory No. 10, which is incorporated herein by reference.

AS TO OBJECTIONS:

**FOX ROTHSCHILD LLP**

**and**

**ROBINSON & LIVELLI**

Dated: November 20, 2006

By: 

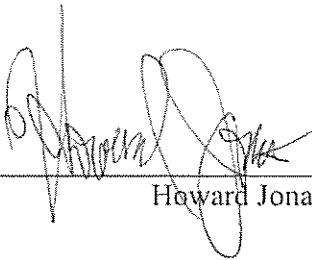
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Howard S. Jonas, Motti Lichtenstein, Jack  
Lerer, David Schropfer, Avi Lazar, Robert  
Schiff, Michael Levine, Jonathan Levy, Alex  
Schwarz, James A. Courter, Joyce Mason and  
John Cate

**CERTIFICATION**

I, Howard Jonas, have reviewed the Answers contained in the foregoing Answers and Objections to Plaintiff's CEPA and LAD Interrogatories. I am informed and believe that the same are true and correct to the best of my knowledge and information.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 20, 2006



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Howard Jonas

**PROOF OF SERVICE**  
(via hand delivery)

I am over the age of 18 and not a party to this action. On this date, I served a true copy of the attached:

**ANSWERS TO PLAINTIFF D. MICHAEL JEWETT'S CEPA AND LAD  
INTERROGATORIES TO HOWARD JONAS**

on the party listed below, via hand delivery, sent to their last known address as follows:

William P. Perniciaro, Esq. The Law Offices of William P. Perniciaro 84 New Dorp Plaza Staten Island, New Jersey 10306	Attorneys for Plaintiff, D. Michael Jewett
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and, via e-mail, to:

Donald A. Robinson Robinson & Livelli Two Penn Plaza East Newark, New Jersey 07105	Co-Counsel for Defendants
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I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 1, 2006

  
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Nicholas J. Falcone

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