

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

Boudreau v. Petit, et al.

C.A. No. 17-301MSM · No. C.A. No. 17-301MSM · Decided March 17, 2026

SUMMARY

The United States District Court for the District of Rhode Island grants defendants’ motion for a protective order concerning plaintiff’s new interrogatories and document requests, and addresses the related extension of time to respond. The court finds good cause under Federal Rule of Civil Procedure 26(c), concluding that the interrogatories exceed the permissible limit and that the discovery is duplicative, overbroad, insufficiently targeted, or disproportionate. The court permits responses to certain document requests that defendants had begun addressing but protects Warwick from responding to the interrogatories and specified remaining requests.

CASE DETAILS

COURT	United States District Court for the District of Rhode Island
WRITING FOR THE COURT	Patricia A. Sullivan
JURISDICTION	United States District Court for the District of Rhode Island
DECIDED	March 17, 2026
DOCKET	C.A. No. 17-301MSM
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff opposed Defendants' motion for a protective order concerning new interrogatories and document requests and Defendants' motion for an extension of time to respond. The magistrate judge granted the protective-order motion in substantial part and denied Plaintiff's request to extend discovery deadlines.
STANDARD OF REVIEW	A protective order under Federal Rule of Civil Procedure 26(c)(1) requires good cause, and the court has broad discretion to determine whether protection is appropriate and what degree of protection is required. The burden rests on the movant to demonstrate a particular need for protection from undue burden or expense.
PRECEDENTIAL VALUE	unpublished

PARTIES

Jason Boudreau v. Kevin Petit, City of Warwick, Warwick Police Department

TOPICS

discovery dispute civil procedure municipal liability section 1983

PRACTICE AREAS

civil procedure civil rights municipal liability discovery

QUESTIONS PRESENTED

1. Whether Defendants showed good cause for a protective order under Federal Rule of Civil Procedure 26(c)(1) concerning Plaintiff's new interrogatories and document requests.
2. Whether Plaintiff could serve more than twenty-five interrogatories by naming the City of Warwick and the Warwick Police Department separately.
3. Whether the motion should be denied because Defendants failed to certify that they had met and conferred as required by Federal Rule of Civil Procedure 26(c)(1).
4. Whether Plaintiff was entitled to extend the fact-discovery deadline or obtain advance judicial approval for future discovery.

HOLDINGS

1. Defendants demonstrated good cause for protection because the thirty-three interrogatories exceeded the twenty-five-interrogatory limit, Plaintiff had already been denied leave to expand that limit, and the interrogatories were independently overbroad, irrelevant, duplicative, and disproportionate.
2. The court granted a limited protective order as to document requests that were duplicative, irrelevant, overbroad, disproportionate, untethered to the facts of the case, or directed to privileged material, but excluded requests to which Warwick was already in the process of responding.
3. The court exercised its discretion to waive strict compliance with Rule 26(c)(1)'s meet-and-confer certification requirement and declined to deny the motion on that ground.
4. The court denied Plaintiff's request to extend the fact-discovery deadline and denied Defendants' request to require advance judicial approval of any future discovery.

KEY QUOTATIONS

"The 'good cause' standard . . . is a flexible one that requires an individualized balancing of the many interests that may be present in a particular case." (II)

"Based on the foregoing and in the unique circumstances here, the Court exercises its discretion to waive strict compliance with the meet-and-confer requirement" (III.C)

FACTUAL BACKGROUND

Plaintiff alleges that Warwick police officer Kevin Petit fabricated, suppressed, and concealed evidence and pursued an overbroad search warrant in retaliation for Plaintiff's prior civil litigation. Plaintiff also asserts a Monell claim against Warwick based on alleged failures to train and supervise and a purported code of silence concerning police misconduct. During discovery, Plaintiff served Warwick with thirty-three new interrogatories and forty-six new document requests, many of which the court found duplicative, overbroad, irrelevant, insufficiently tied to the pleaded claims, privileged, or disproportionate.

PROCEDURAL HISTORY

Boudreau filed this civil-rights action in 2017 and later filed a Second Amended Complaint alleging that Officer Petit fabricated evidence and caused an allegedly retaliatory embezzlement prosecution, and that Warwick was liable under Monell. After the case was stayed, discovery began in 2023 and the court issued numerous discovery rulings. Defendants moved for protection from thirty-three interrogatories and forty-six document requests served on Warwick in November 2025; the court granted protection as to the interrogatories and most document requests, while permitting responses to requests already being addressed.

DISPOSITION

other

CASES CITED

- *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 36 (1984)
- *Gill v. Gulfstream Park Racing Ass'n, Inc.*, 399 F.3d 391, 402 (1st Cir. 2005)
- *Walker v. IHI Power Services Corp.*, 2025 WL 949239, at *2 (D.R.I. Mar. 28, 2025)
- *Heagney v. Wong*, 2016 WL 2901731, at *3 (D. Mass. May 18, 2016)
- *Anderson v. Cryovac, Inc.*, 805 F.2d 1, 7 (1st Cir. 1986)
- *Gericke v. Begin*, 2012 WL 4340520, at *1 (D.N.H. Sept. 20, 2012)
- *Lalonde v. Textron*, 2005 WL 8176212, at *2 (D.R.I. Oct. 12, 2005)
- *Criscione v. Divincenzo*, 2025 WL 3153390, at *3 n.5 (N.D. Ohio Nov. 12, 2025)
- *Stein v. Collins*, 2025 WL 1248916, at *3 (D. Mass. Apr. 30, 2025)
- *Jackson v. Unicity International, Inc.*, 2025 WL 2222767, at *1 n.1 (D. Nev. Aug. 5, 2025)
- *Boudreau v. Petit*, 2024 WL 4771355, at *1-2 (D.R.I. Nov. 13, 2024)
- *Boudreau v. Petit*, 2025 WL 437498, at *2, *4-6 (D.R.I. Feb. 7, 2025)
- *Boudreau v. Petit*, 2024 WL 665546, at *1-2 (D.R.I. Feb. 16, 2024)
- *United States v. Boudreau*, 58 F.4th 26, 29 (1st Cir. 2023)
- *Boudreau v. Lussier*, 901 F.3d 65, 69 (1st Cir. 2018)
- *Boudreau v. Petit*, 2024 WL 3092151, at *3 (D.R.I. June 18, 2024)
- *Boudreau v. Lussier*, 2014 WL 651536, at *1-2 (D.R.I. Feb. 19, 2014)
- *Boudreau v. Petit*, 2024 WL 4356314, at *2, *8 (D.R.I. Sept. 30, 2024)

- Boudreau v. Petit, 2024 WL 4279094, at *1 n.1 (D.R.I. Sept. 24, 2024), adopted, 2025 WL 305933 (D.R.I. Jan. 27, 2025)
- Boudreau v. Petit, 2024 WL 4279522, at *1 (D.R.I. Sept. 24, 2024)
- Boudreau v. Smith, 2019 WL 5417744, at *3-4 (D. Conn. Oct. 22, 2019)
- United States v. Pavao, 134 F.4th 649, 659 (1st Cir. 2025) (per curiam)
- United States v. Pavao, 2023 WL 3934555, at *2 (D.R.I. June 9, 2023)
- Mejia v. Cenerini, 2012 WL 5472164, at *1-2 (D.R.I. July 12, 2012)
- Fernandes v. Bouley, 2022 WL 2915702, at *6 (D. Mass. July 25, 2022)
- Aponte-Navedo v. Nalco Chemical Co., 268 F.R.D. 31, 41 (D.P.R. 2010)
- Heidelberg Americas, Inc. v. Tokyo Kikai Seisakusho, Ltd., 333 F.3d 38, 41 (1st Cir. 2003)

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