

DOCKET NO.: HHD-CV-23-6165724-S : SUPERIOR COURT
SHAFFER BEACON MECHANICAL LLC : JUDICIAL DISTRICT OF
HARTFORD
VS. : AT HARTFORD

SRK MANAGEMENT LLC ET AL : APRIL 10, 2024

SECOND AMENDED COMPLAINT

FIRST COUNT: (as to SRK Management LLC)

1. On or about October 18, 2021, the plaintiff, Shaffer Beacon Mechanical LLC, and the defendant, SRK Management LLC duly authorized by Castle Ventures, LLC d/b/a Castle Apartments, entered into an agreement whereby the plaintiff agreed to provide the defendant, SRK Management LLC, with new efficiency boilers, gas piping for a new boiler, services and labor for apartment buildings located in Waterbury, Connecticut and Plainville, Connecticut at the defendant's request. A copy of the agreement is attached hereto as Exhibit A.

2. The plaintiff performed of all of its obligations to the defendant, SRK Management, LLC, in connection with said agreement.

3. The defendant, SRK Management LLC, has defaulted in that it has failed to pay the plaintiff for said efficiency boilers, services and labor and the plaintiff is exercising its right to declare the entire balance due and owing.

4. There is presently due and owing from the defendant, SRK Management LLC, to the plaintiff the sum of \$19,588.99 [\$7,092.89 principal plus finance charges in the amount of \$12,496.10], accruing finance charges and all costs of collection including reasonable attorney fees.

5. Demand has been made but the defendant, SRK Management LLC, has refused and/or neglected to pay plaintiff said sum.

SECOND COUNT: (as to Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC)

1. On or before March 11, 2022, the defendants, Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC, through its agent, the defendant, SRK Management LLC, entered into an agreement for gas piping for a new motor along with materials, services and labor for apartment buildings known as Piping Rock Apartments, 1579 Hamilton Avenue, Waterbury, Connecticut at the defendant's request.

2. The defendants, Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC, are the record owners of the premises.

3. The plaintiff performed of all of its obligations to the defendant, SRK Management LLC, in connection with said agreement.

4. The defendant, SRK Management LLC, has defaulted in that they have failed to pay the plaintiff for gas piping for a new motor along with materials, services and labor.

5. There is presently due and owing from the defendants, Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC, to the plaintiff the sum of \$9,566.58 [\$7,092.89 principal plus interest in the amount of \$2,473.69 at the statutory rate of 10 percent per annum in accordance with C.G.S. 37-3a. See Exhibit B attached hereto].

THIRD COUNT: (Unjust Enrichment as to Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC)

1. On or before March 11, 2022, the plaintiff, Shaffer Beacon Mechanical LLC, and the defendant, SRK Management LLC, entered into an agreement whereby the plaintiff agreed to provide the defendant, SRK Management LLC, with gas piping for a new motor along with materials, services and labor for apartment buildings known as Piping Rock Apartments, 1579 Hamilton Avenue, Waterbury, Connecticut at the defendant's request.

2. The defendants, Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC, are the record owners of the premises.

3. The plaintiff performed of all of its obligations to the defendant, SRK Management LLC, in connection with said agreement.

4. The defendant, SRK Management LLC, has defaulted in that they have failed to pay the plaintiff for said gas piping for a new motor along with materials, services and labor.

5. The defendants, Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC have been unjustly enriched thereby, to plaintiff's detriment.

6. There is presently due and owing from the defendants, Middlebury-Piping Ventures LLC and Middlebury-Piping Ventures II LLC, to the plaintiff the sum of \$9,566.58 [\$7,092.89 principal plus interest in the amount of \$2,473.69 at the statutory rate of 10 percent per annum in accordance with C.G.S. 37-3a].

FOURTH COUNT: (as to Castle Ventures LLC)

1. On or about October 13, 2021, the defendant, Castle Ventures LLC, entered into an agreement, through its agent, the defendant, SRK Management LLC, for new efficiency gas boilers along with materials, services and labor for apartment buildings known as Castle Apartments, 100 Norton Park Road, Plainville, Connecticut. A copy of the agreement is attached hereto as Exhibit A.

2. The defendant, Castle Ventures, LLC, is the record owner of the premises.

3. The plaintiff performed of all of its obligations to the defendant, SRK Management LLC, in connection with said agreement.

4. The defendant, SRK Management LLC, has defaulted in that they have failed to pay the plaintiff for said new efficiency gas boilers along with materials, services and labor.

5. There is presently due and owing from the defendant, Castle Ventures, LLC, to the plaintiff the sum of \$7,593.31 finance charges and all costs of collection, including reasonable attorney fees.

FIFTH COUNT: (Unjust enrichment as to Castle Ventures LLC)

1. On or about October 13, 2021, the defendant, Castle Ventures LLC, entered into an agreement, through its agent, the defendant, SRK Management LLC, for new efficiency gas boilers along with materials, services and labor for apartment buildings known as Castle Apartments, 100 Norton Park Road, Plainville, Connecticut. A copy of the agreement is attached hereto as Exhibit A.

2. The defendant, Castle Ventures, LLC, is the record owner of the premises.

3. The plaintiff performed of all of its obligations to the defendant, SRK Management LLC, in connection with said agreement.

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