

VS.

: AT PUTNAM

RICHARD CHENEY

: ~~OCTOBER~~MARCH 22, 20202021AMENDED COMPLAINTFIRST COUNT: (Jolly John's Truck and Equipment, LLC v. Richard Cheney)

1. The plaintiff, Jolly John's Truck & Equipment is a Connecticut limited liability company with a principal place of business at 380 North Main Street in Moosup, Connecticut.
2. The defendant, Richard Cheney, is an individual with an address of 42 Oak Drive in Mansfield Center, Connecticut.
3. ~~In January, 2018 through July, 2018, the defendant rented a 1973 John Deere pay loader from the plaintiff.~~
3. In January, 2018, the defendant, Richard Cheney, requested of the plaintiff that he be allowed the use of a certain 1973 John Deere pay loader in order to evaluate whether he wished to purchase the same. It was agreed by the plaintiff and the defendant, Richard Cheney, that if he in fact purchased the pay loader, that he would not be charged any rental fee. It was further agreed that if he did not purchase the pay loader, then he would be charged the reasonable rental value of the pay loader.

not purchase the pay loader and the plaintiff requested that the pay loader be returned. The defendant then made arrangements for the rental of said equipment isreturn of the pay loader.

4.5. In accordance with the agreement reached by the parties, wherein the defendant would be responsible to pay for the reasonable rental value of the 1973 John Deere pay loader in the event that it was not purchased, the sum of Six Thousand Dollars & 00/100 (\$6,000.00) plus tax of Three Hundred Eighty-One Dollars & 00/100 (\$381.00) for a total due of Six Thousand Three Hundred Eight-One Dollars & 00/100 (\$6,381.00) A copy of the invoice is attached hereto as Exhibit "A".

5.6. Despite demand, the defendant has failed, neglected, or refused to pay the same.

**SECOND COUNT: (Jolly John's Truck and Equipment v. Mattern Construction, Inc.)**

1. The plaintiff, Jolly John's Truck & Equipment is a Connecticut limited liability company with a principal place of business at 380 North Main Street in Moosup, Connecticut.

3. In January, 2018, through July, 2018, Richard Cheney, as agent for and acting on behalf of the defendant, Mattern Construction, Inc., ~~rented~~ agreed to purchase and/or to rent a 1973 John Deere pay loader from the plaintiff.
4. ~~The amount due~~ pay loader was not purchased, and the defendant is liable for the reasonable rental value of said equipment is the 1973 John Deere pay loader in the amount of Six Thousand Dollars & 00/100 (\$6,000.00) plus tax of Three Hundred Eighty-One Dollars & 00/100 (\$381.00) for a total amount due of Six Thousand Three Hundred Eight-One Dollars & 00/100 (\$6,381.00) ~~A copy of the invoice is attached hereto as Exhibit "A".~~
5. The defendant has failed, neglected, or refused to pay the same.

**WHEREFORE**, the plaintiff claims:

1. Monetary damages;
2. Interest;
3. Attorney's fees;
4. Court costs; and
5. Any other legal or equitable relief to which the plaintiff may be entitled.

This matter is within the jurisdiction of this Court.

Dated at Woodstock, Connecticut this 22<sup>nd</sup> day of ~~October, 2020~~ March, 2021.

**THE PLAINTIFF**

**CERTIFICATION**

I hereby certify that on this 22<sup>nd</sup> day of ~~October~~March, 2020 a copy of the foregoing was sent via electronic-mail and/or facsimile and regular mail, to the following counsel of record and self-represented party:

Charles K. Norris, Esq.  
Chinigo Leone & Maruzo LLP  
141 Broadway  
PO Box 510  
Norwich, CT 06360  
(Facsimile: 860-887-1744)

Mr. Richard Cheney (pro se)  
42 Oak Drive  
Mansfield, CT 06250  
(Email: riche1859@gmail.com)

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.