

◇ DOCKET NO. WWM-CV-19-6016996-S : SUPERIOR COURT
JOLLY JOHN'S TRUCK AND : JUDICIAL DISTRICT OF
WINDHAM EQUIPMENT
VS. : AT PUTNAM
RICHARD CHENEY : APRIL 5, 2021

ANSWER

FIRST COUNT:

The Defendant Mattern Construction does not respond to the First Count, as it is directed at the Defendant Richard Cheney.

SECOND COUNT:

1. The Defendant, Mattern Construction has no knowledge of the facts alleged in Paragraph one and therefore neither admits or denies paragraph one and, therefore, leaves the Plaintiff to its proof.
2. The Defendant Mattern Construction admits the allegations made in paragraph two.
3. The Defendant Mattern Construction denies the allegations made in paragraph three.
4. The Defendant Mattern Construction denies the allegations made in paragraph four.
5. The Defendant Mattern Construction denies the allegations made in paragraph five.

◇ SPECIAL DEFENSE

The Defendant, Mattern Construction, paid the Defendant, Richard Cheney, for the rental of the payloader.

THE DEFENDANT,
MATTERN CONSTRUCTION

By: 408314
Charles Norris
Chinigo, Leone & Maruzo, LLP
Its Attorneys

CERTIFICATION

I hereby certify that on the 5th day of April, 2021, a copy of the forgoing was sent to the following counsel of record and self-represented party:

Mr. Richard Cheney
42 Oak Drive
Mansfield, CT 06250

Attorney Mark Brouillard
Post Office Box 550
Putnam CT. 06260

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Charles K. Norris

