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 5<sup>th</sup> 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

> 408314 Charles K. Norris

