#### **SUMMONS - CIVIL**

JD-CV-1 Rev. 2-13

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C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259, P.B. Secs. 3-1 through 3-21, 8-1

#### STATE OF CONNECTICUT SUPERIOR COURT www.jud.ct.gov

"X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.

X<sup>"</sup> if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.

"X" if claiming other relief in addition to or in lieu of money or damages.

See page 2 for instructions

TO: Any proper officer; BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

			and the second				
Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)			Telephone number of clerk (with area code)	Return Date (Mus	t be a Tuesday)		
300 Grand Street. Waterbury, CT 06702				(203)591-3300	August	4, <u>2 015</u>	
X Judicial District			At (Town in which writ is re	eturnable) (C.G	.S. §§ 51-346, 51-349)	Case type code (S	
G.A. Housing Session		Waterbury		Major: T	Minor: 61		
For the Plain	tiff(s) please en	iter the app	earance of:				
Name and address of attorney, law firm or plaintiff if self-rep			presented (Number, street, town and zip code)		Juris number (to be entered by attorney only)		
The Dodd Law Firm, LLC, Ten Corporate C			enter, 1781 Highland	Avenue, C	heshire, CT 06410	402420	
Telephone number	(with area code)		Signature of Plaintiff (If sel	f-represented)			
(203) 272-1883							
Number of Plaintiffs: 1 Number of D		Number of De	efendants: 2 Form JD-CV-2 attached for additional parties				
Parties	Name (Last, Fi	irst, Middle Ini	tial) and Address of Ea	ch party (Nu	mber; Street; P.O. Box; Tow	n; State; Zip; Cou	ntry, if not USA)
First Plaintiff	Name: Tompkins, Lynn PPA Ronda Tompkins P-0   Address: 3 Ridgewood Street Waterbury, CT 06710				P-01		
Additional Plaintiff	Name: Address:						P-02
First Defendant	Name: Lopez, H Address: 28 Trow Waterbu	leather bridge Stree ıry, CT 0671					D-01
Additional Defendant	Name: Aquino, Address: 28 Trow Waterbu						D-02
Additional Defendant	Name: Address:					1 sector	D-03
Additional Defendant	Name: Address:						D-04

#### Notice to Each Defendant

- 1. YOU ARE BEING SUED. This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
- 2. To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
- 3. If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
- 4. If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www-jud.ct.gov under "Court Rules."
- 5. If you have questions about the Summons and Complaint, you should talk to an attorney quickly. The Clerk of Court is not allowed to give advice on legal questions.

Signed (Sign and A proper po)		Name of Person Signing at Left		Date signed
1	Superior Court Assistant Clerk	Matthew E. Dodd		6/10/2015
If this Summons is signed by	a Clerk:		For	Court Use Only
a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts.				
b. It is the responsibility of th				
c. The Clerk is not permitted				
d. The Clerk signing this Sur	ins			
in the Summons, any alleg				
I certify I have read and	Signed (Self-Represented Plaintiff)	Date	_	
understand the above:				
Name and address of person rec	cognized to prosecute in the amount of \$250			
G. lagrossi, 1781 Highla	and Avenue, Ste 105, Cheshire, CT 06410	1		
Signed (Official taking recognizance;/"X" proper box)			Docket Num	nber
	// /	Superior Court Assistant Clerk	·	

RETURN DATE: AUGUST 4, 2015	: SUPERIOR COURT
LYNN TOMPKINS PPA RONDA TOMPKINS	: JUDICIAL DISTRICT OF WATERBURY
V.	: AT WATERBURY
HEATHER LOPEZ, ET AL	: JUNE 10, 2015

#### **COMPLAINT**

### **<u>COUNT ONE:</u>** (As to the Defendant, Heather Lopez)

1. On or about May 24, 2014, the Plaintiff, Lynn Tompkins, was inside her residence located at 3 Ridgewood Street in Waterbury, Connecticut, a dog named Kingston attacked her causing the Plaintiff to sustain serious and permanent personal injuries and other losses as hereinafter set forth.

2. At said time, and for some time prior thereto, said dog (Kingston) was owned and/or kept by the Defendant, Heather Lopez.

3. At said time the Plaintiff was not engaged in the commissioner of a trespass or tort and was not teasing, tormenting or abusing said dog.

4. As a result of the conduct of the Defendant's dog, the Plaintiff, Lynn Tompkins, sustained the following injuries, consequential losses and expenses, all or some of which may be permanent in nature:

- (a) An injury to the face;
- (b) Pain, suffering and discomfort;

- (c) Emotional distress and mental anguish;
- (d) Headaches, anxiety, fatigue, apprehension and inconvenience;
- (e) The Plaintiff has in the past been and may in the future, be obligated to expend sums of money for medical care, hospital care, x-rays, surgeries, medicines, physical therapy, and other medical related services;
- (f) The Plaintiff has in the past been, and may in the future, be deprived of many of the usual pleasures, activities, and recreations of life; and
- (g) Said injuries and consequences have adversely affected the Plaintiff in the past and will continue to do so in the future.

5. Lynn Tompkins is the minor child of Ronda Tompkins and brings this action through her mother and next of friend, Ronda Tompkins.

# **<u>COUNT TWO:</u>** (As to the Defendant, Angelo Aquino)

1. On or about May 24, 2014, the Plaintiff, Lynn Tompkins, was inside her residence located at 3 Ridgewood Street in Waterbury, Connecticut, a dog named Kingston attacked her causing the Plaintiff to sustain serious and permanent personal injuries and other losses as hereinafter set forth.

2. At said time, and for some time prior thereto, said dog (Kingston) was owned and/or kept by the Defendant, Angelo Aquino.

3. At said time the Plaintiff was not engaged in the commissioner of a trespass or tort and was not teasing, tormenting or abusing said dog.

4. As a result of the conduct of the Defendant's dog, the Plaintiff, Lynn Tompkins, sustained the following injuries, consequential losses and expenses, all or some of which may be permanent in nature:

- (a) An injury to the face;
- (b) Pain, suffering and discomfort;
- (c) Emotional distress and mental anguish;
- (d) Headaches, anxiety, fatigue, apprehension and inconvenience;
- (e) The Plaintiff has in the past been and may in the future, be obligated to expend sums of money for medical care, hospital care, x-rays, surgeries, medicines, physical therapy, and other medical related services;
- (f) The Plaintiff has in the past been, and may in the future, be deprived of many of the usual pleasures, activities, and recreations of life; and
- (g) Said injuries and consequences have adversely affected the Plaintiff in the past and will continue to do so in the future.

5. Lynn Tompkins is the minor child of Ronda Tompkins and brings this action through her mother and next of friend, Ronda Tompkins.

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WHEREFORE, the Plaintiff claims money damages.

Of this Writ, with your doings thereon, make due service and return.

Dated at Cheshire, Connecticut this 10<sup>th</sup> day of June, 2015.

THE PLAINTIFF,

By:

Matthew E. Dodd, Her Attorney The Dodd Law Firm, L.L.C. Ten Corporate Center 1781 Highland Avenue, Suite 105 Cheshire, CT 06410 Telephone: 203-272-1883 Facsimile: 203-272-2077 Juris No: 402420

RETURN DATE: AUGUST 4, 2015	: SUPERIOR COURT
LYNN TOMPKINS PPA RONDA TOMPKINS	: JUDICIAL DISTRICT OF WATERBURY
V.	: AT WATERBURY
HEATHER LOPEZ, ET AL	: JUNE 10, 2015

#### **STATEMENT RE: AMOUNT IN DEMAND**

The Plaintiff in the above-entitled action hereby sets forth that the amount in demand is in excess of fifteen thousand dollars (\$15,000.00), exclusive of interest and costs.

THE PLAINTIFF,

By:

Matthew E. Dodd, Her Attorney Commissioner of the Superior Court The Dodd Law Firm, L.L.C. Ten Corporate Center 1781 Highland Avenue, Suite 105 Cheshire, CT 06410 Telephone: 203-272-1883 Facsimile: 203-272-2077 Juris No: 402420

# CONNECTICUT STATE MARSHAL Marshal's Return

STATE OF CONNECTICUT) ) SS. MERIDEN COUNTY OF NEW HAVEN) J.D. WATERBURY TOMPKINS, LYNN PPA RONDA TOMPKINS V. LOPEZ, HEATHER **JUNE 21, 2015** 

Then and by virtue hereof and by direction Of MATTHEW E. DODD Esq. and BY AUTHORITY OF THE STATE OF CONNECTICUT I left a true and attested copy of the within original SUMMONS, COMPLAINT and STATEMENT IN RE: AMOUNT IN DEMAND, with and in the hands of LOPEZ, HEATHER at 28 Trowbridge Street, Waterbury, CT. Service occurred on June 21, 2015

The within is the Original Summons and attached Complaint and Statement in Re Amount in Demand, with my doing hereon endorse.

Attest:

Robert L. Green CT. State Marshal New Haven County

FEES:	
Service	\$ 40.00
<b>Reading/Copies</b>	\$ 6.00
Endorsements	\$ 1.20
Travel	\$ 17.06
Total:	\$ 64.26

### MEMO

Marshal Robert L. Green Connecticut State Marshal New Haven County 91 Westfort Drive Meriden, Ct. 06451-3651 Cell: 203-506-7554 Phone/Fax: 203 440-0983

THE DODD LAW FIRM, LLC. DATE OF SERVICE JUNE 21, 2015 MATTHEW E. DODD 1781 HIGHLAND AVE. STE. 105 CHESHIRE, CT 06410-1254

RE: FILE #: 14011.00000 LYNN TOMPKINS PPA RONDA TOMPKINS v. CADILLAC APARTMENTS LLC

UNABLE TO LOCATE AQUINO, ANGELO ADDRESS UNKNOWN, LIVING ON THE STREETS!!! .PER MY CONVERSATION WITH PARALEGAL GABRIELLA IAGROSSI IN JUNE, 2015

Very truly yours, Marshal Robert L. Green



#### E-Mail: dodd@doddlrd.necoxmail.com Logout

#### **Hide Instructions**

Attorney/Firm: DODD LAW FIRM LLC (402420)

# You have successfully e-filed!

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The service fee is not broken down for each document filed and paid for in a multiple item transaction. Also, the confirmation number is the same for all documents paid for in the transaction.

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# **Payment Information**

Confirmation Number: 50340019 Total Court Fees: \$350.00 LexisNexis Service Fee: \$7.70 Total Transaction Amount: \$357.70 Payment Method: Credit Card Payment Date: 07/28/2015 12:04PM Payment By: DODD LAW FIRM LLC (402420)

# **Document Summary**

	Confirmation Number:	50340019			
	Docket Number:		<u>15-6027947S</u> e an email when there is activity on this case,		
		click here			
	Case Name:	TOMPKIN HEATHEF	IS, LYNN PPA RONDA TOMPKINS v. LOPEZ, R ET AL		
	Type of Transaction:	E-File Nev	w Case		
	Court Fee:	\$350.00			
	Date Filed: JUL-28-2015				
	Filed By: DODD LAW FIRM LLC Juris# 402420				
	Document Filed:	COMPLA			
Date and Time of Transaction: Tuesday, July 28, 2015 12:06:21 PM					
	Return to Civil / Family Menu Return to Shoppir	ng Cart	File Additional Documents On This Case		