

DOCKET NO. UWY-CV15-6026104-S : SUPERIOR COURT
KURT SULLIVAN ET AL : J.D. OF WATERBURY
V. : AT WATERBURY
ELISA PALMIERI-LAUDATI : FEBRUARY 19, 2015

ANSWER AND SPECIAL DEFENSES

COUNT ONE: (PLAINTIFF, KURT SULLIVAN)

1. The allegations contained in Paragraph 1 are admitted.
2. The allegations contained in Paragraph 2 are denied.
- 4-7. As to the allegations contained in Paragraphs 4 through 7, the undersigned

Defendant has insufficient information or knowledge upon which to form a belief and therefore, leaves the Plaintiff to his proof. Any allegations or inferences of negligence against the undersigned Defendant are hereby denied.

COUNT TWO: (PLAINTIFF, KURT SULLIVAN, PPA PATRICK SULLIVAN)

- 1-3. As to the allegations contained in Paragraphs 1 through 3, the undersigned

Defendant has insufficient information or knowledge upon which to form a belief and therefore, leaves the Plaintiff to his proof.

- 4-5. The allegations contained in Paragraphs 4 and 5 are denied.

6-8. As to the allegations contained in Paragraphs 6-8., the undersigned Defendant has insufficient information or knowledge upon which to form a belief and therefore, leaves the Plaintiff to his proof. Any allegations or inferences of negligence against the undersigned Defendant are hereby denied.

SPECIAL DEFENSES

If the Plaintiff **Kurt Sullivan** suffered the injuries and losses alleged in his complaint, it was as a result of his own negligence and carelessness which was a substantial factor in causing the accident. The Plaintiff was careless and negligent in one or more of the following respects:

1. in that he was inattentive and failed to keep a proper lookout;
2. in that he failed to make reasonable use of his faculties and senses so as to avoid the accident;
3. in that he drove his vehicle at an excessive rate of speed for the driving conditions then and there prevailing;
4. in that he failed to turn his vehicle so as to avoid the accident although he had sufficient opportunity to do so;
5. in that he failed to apply his brakes so as to avoid said collision; and
6. in that he operated his vehicle at an unreasonable rate of speed without regard to the traffic, weather, time of day, width or use of the highway and intersections of streets.

THE DEFENDANT,
ELISA PALMIERI-LAUDATI

By _____/s/426735

Christopher M. Russo, Esq.

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CERTIFICATION

This is to certify that all personal identifying information was redacted pursuant to *Practice Book Section 4-7*. This will further certify the foregoing was mailed via U.S. Mail, postage pre-paid or electronically delivered pursuant to *Practice Book Section 10-14* on this 19th day of February, 2015.

Attorney for Plaintiff

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/s/426735

Christopher M. Russo
Commissioner of the Superior Court