SUMMONS - CIVIL

JD-CV-1 Rev. 4-16 C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259, P.B. §§ 3-1 through 3-21, 8-1, 10-13

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

See other side for instructions

See other side for instructions							
"X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500. "X" 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.							
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.							
Address of court clerk where writ and other papers shall be filed (Number, street, town and (C.G.S. §§ 51-346, 51-350)			and zip code)	Telephone number of clerk (with area code)	Return Date (M	ust be a Tuesday)	
95 Washingto	n Street, Hartford, CT 0610	3		(860)548-2700	January Month	21 , 2 020 Day Year	
Judicial Distric Housing Sessi	G.A.	At (Town in which writ is r Hartford	returnable) (C.G	.S. §§ 51-346, 51-349)	A PROPERTY OF THE PARTY OF THE	(See list on page 2) Minor: 61	
For the Plaintiff(s) please enter the appearance of:							
	of attorney, law firm or plaintiff if self-	A CONTRACTOR OF THE PROPERTY O	town and zip c	ode)	Complete Commercion II Break	be entered by attorney only)	
	Davis, P.C., 131 Oak Street	lartford, CT 06106 09 Signature of Plaintiff (If self-represented)			050361		
Telephone number (with area code) Signature of Plaintiff (If self-represented) Signature of Plaintiff (If self-represented)							
The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book. Email address for delivery of papers under Section 10-13 (if agreed to) jhoulihan@riscassidavis.com							
Number of Plaintiffs: 1 Number of Defendants: 2 Form JD-CV-2 attached for additional parties							
Parties	Parties Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)						
First Plaintiff	Name: D'ALEO, JOHN F., EXECUTOR OF THE ESTATE OF D'ALEO, JANET P. a/k/a D'ALEO, JANET M. P-01 Address: 41 Grant Road, Enfield, CT 06082						
Additional Plaintiff	Name: P-02 Address:						
First Defendant	Name: HORNISH, MARYANNE A. Address: 584 Thrall Avenue, Suffield, CT 06078						
Additional Defendant	Name: HORNISH, NEIL J. Address: 584 Thrall Avenue, Suffield, CT 06078						
Additional Defendant	Name: Address:					D-03	
Additional Defendant	Name: Address:					D-04	
Notice to Each Defendant							
 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. 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. 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." 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." 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 "	X" pyoper box)	Commissioner of the Superior Court	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Person Signing at Left		Date signed	
Jac	Herry	Assistant Clerk	John J	. Houlihan, Jr.	For	12/11/2019 Court Use Only	
If this Summon's is signed by a Clerk: 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 the Plaintiff(s) to see that service is made in the manner provided by law. c. The Clerk is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.							

Date

Docket Number

Signed (Self-Represented Plaintiff)

I certify I have read and

understand the above:

RETURN DATE: JANUARY 21, 2020

JOHN F. D'ALEO, EXECUTOR OF THE ESATE OF JANET P. D'ALEO SUPERIOR COURT

a/k/a JANET M. D'ALEO

V.

JUDICIAL DISTRICT OF

HARTFORD AT HARTFORD

MARYANNE A. HORNISH; and NEIL J. NORNISH

DECEMBER 11, 2019

COMPLAINT

FIRST COUNT: John F. D'Aleo, Executor of the Estate of Janet P. D'Aleo a/k/a
Janet M. D'Aleo v. Maryanne A. Hornish (§ 22-357)

- 1. On or about November 15, 2019, the plaintiff, John F. D'Aleo, was appointed Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo ["D'Aleo"] by the Court of Probate, North Central Connecticut Probate District, in the State of Connecticut, and is authorized to act in that capacity.
- 2. On or about November 6, 2019, and for some time prior thereto, the defendant, Maryanne A. Hornish, was the owner and/or keeper of a dog named "Dexter."
- 3. On or November 6, 2019, at approximately 3:00 p.m., D'Aleo was lawfully on the premises located at 584 Thrall Avenue, Suffield, Connecticut.
- 4. At or about that same time and place, the dog owned by the defendant,

 Maryanne A. Hornish, attacked D'Aleo, knocking her to the ground and bit her savagely,

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ATTORNEYS-AT-LAW

131 OAK STREET

P. O. BOX 261557

HARTFORD, CT 06126-1557

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maiming and mutilating her lower extremities, thereby causing the plaintiff's decedent to sustain and suffer the catastrophic personal injuries and losses hereinafter set forth.

- At all times relevant herein, D'Aleo was not committing a trespass or other tort, and was not teasing, tormenting, or abusing the dog owned by the defendant, Maryanne A. Hornish.
- 6. The defendant, Maryanne A. Hornish, is liable to the estate of D'Aleo for the personal injuries and losses sustained by the plaintiff's decedent as a result of this incident, pursuant to Section 22-357 of the Connecticut General Statutes.
- 7. As a result of the above-described incident involving the dog owned and/or kept by the defendant, Maryanne A. Hornish, D'Aleo sustained and suffered severe personal injuries and losses including significant bite wounds and lacerations to her lower extremities, resulting in flesh, muscle, and tendon loss; injuries to the nerves, muscles, and soft tissues of her body; and a shock to her entire nervous system, some or all of which resulted in her untimely death.
- 8. As a further result thereof, D'Aleo suffered extreme physical pain, emotional distress, and mental anguish prior to her death.
- 9. As a further result thereof, D'Aleo has been permanently deprived of the opportunity to pursue and enjoy life's activities.

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- 10. As a further result thereof, the plaintiff, John F. D'Aleo, has been forced to incur financial obligations for ambulance, hospital, funeral, and burial expenses on behalf of the plaintiff's decedent, Janet P. D'Aleo a/k/a Janet M. D'Aleo.
- 11. The plaintiff, John F. D'Aleo, brings this Count pursuant to §52-555 of the Connecticut General Statutes.

SECOND COUNT: John F. D'Aleo, Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo v. Maryanne A. Hornish

- 1. On or about November 15, 2019, the plaintiff, John F. D'Aleo, was appointed Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo ["D'Aleo"] by the Court of Probate, North Central Connecticut Probate District, in the State of Connecticut, and is authorized to act in that capacity.
- 2. On or about November 6, 2019, and for some time prior thereto, the defendant, Maryanne A. Hornish, was the owner and/or keeper of a dog named "Dexter."
- 3. On or about November 6, 2019, at approximately 3:00 p.m., D'Aleo was lawfully on the premises located at 584 Thrall Avenue, Suffield, Connecticut.
- 4. At or about that same time and place, the dog owned by the defendant,
 Maryanne A. Hornish, attacked D'Aleo, knocking her to the ground and bit her savagely,
 maiming and mutilating her lower extremities, thereby causing the plaintiff's decedent to
 sustain and suffer the catastrophic personal injuries and losses hereinafter set forth.

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- 5. This incident and the injuries and losses sustained and suffered by the plaintiff's decedent, and/or her estate, were caused by the negligence and carelessness of the defendant, Maryanne A. Hornish, in one or more of the following ways:
 - a. in that she knew, or in the exercise of reasonable care should have known, of the propensity of this dog to attack and/or bite persons in proximity to said dog, yet failed to take any action to prevent said dog from attacking and killing the plaintiff's decedent; and/or
 - b. in that she was aware of the potential for danger while the dog was unrestrained, yet she failed to warn the plaintiff's decedent of the same; and/or
 - in that she failed to properly and adequately supervise the dog which was owned and/or kept by her; and/or
 - d. in that she knew, or should have known, that failing to properly and adequately supervise the dog, which was owned and/or kept by her, created a danger to members of the public, including the plaintiff's decedent, yet she failed to properly and adequately supervise the dog; and/or
 - e. in that she knew, or in the exercise of reasonable care should have known, of the propensity of the dog to attack and/or bite persons, yet failed to warn the plaintiff's decedent of the same.
 - 6. As a result of the negligence and carelessness of the defendant, Maryanne A. Hornish, D'Aleo sustained and suffered severe personal injuries and losses including significant bite wounds and lacerations to her lower extremities, resulting in flesh,

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muscle, and tendon loss; injuries to the nerves, muscles, and soft tissues of her body; and a shock to her entire nervous system, some or all of which resulted in her untimely death.

- 7. As a further result thereof, D'Aleo suffered extreme physical pain, emotional distress, and mental anguish prior to her death.
- 8. As a further result thereof, D'Aleo has been permanently deprived of the opportunity to pursue and enjoy life's activities.
- 9. As a further result thereof, the plaintiff, John F. D'Aleo, has been forced to incur financial obligations for ambulance, hospital, funeral, and burial expenses on behalf of the plaintiff's decedent, Janet P. D'Aleo a/k/a Janet M. D'Aleo.
- 10. The plaintiff, John F. D'Aleo, brings this Count pursuant to §52-555 of the Connecticut General Statutes.

THIRD COUNT: John F. D'Aleo, Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo v. Maryanne A. Hornish (Common Law Recklessness)

- 1. On or about November 15, 2019, the plaintiff, John F. D'Aleo, was appointed Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo ["D'Aleo"] by the Court of Probate, North Central Connecticut Probate District, in the State of Connecticut, and is authorized to act in that capacity.
- 2. On or about November 6, 2019, and for some time prior thereto, the defendant, Maryanne A. Hornish, was the owner and/or keeper of a dog named "Dexter."

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- At some time prior to November 6, 2019, the aforementioned dog was involved in an incident in which it bit a person.
- 4. At some time prior to November 6, 2019, the aforementioned dog was involved in an incident in which it bit another dog.
- At all times mentioned herein, the defendant, Maryanne A. Hornish, failed to register the aforementioned dog with the Town of Suffield, in violation of Section 22-339 of the Connecticut General Statues.
- 6. At all times mentioned herein, the defendant, Maryanne A. Hornish, failed to provide a valid rabies vaccination certificate to the Town of Suffield, in violation of Section 22-339b of the Connecticut General Statutes.
- 7. At all times mentioned herein, the defendant, Maryanne A. Hornish, was aware that the aforementioned dog suffered from anxiety, yet chose to discontinue the dog's anti-anxiety medication.
- 8. On or about November 6, 2019, at approximately 3:00 p.m., D'Aleo was lawfully on the premises located at 584 Thrall Avenue, Suffield, Connecticut.
- 9. At or about that same time and place, the dog owned by the defendant,
 Maryanne A. Hornish, attacked D'Aleo, knocking her to the ground and bit her savagely,
 maiming and mutilating her lower extremities, thereby causing the plaintiff's decedent to
 sustain and suffer the catastrophic personal injuries and losses hereinafter set forth.

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- 10. This incident and the injuries and losses sustained and suffered by D'Aleo were caused by the willful, wanton, and reckless conduct of the defendant, Maryanne A. Hornish, in one or more of the following ways:
 - a. in that she knew, or in the exercise of reasonable care should have known, of the propensity of this dog to attack and/or bite persons in proximity to said dog, yet failed to take any action to prevent said dog from attacking and killing the plaintiff's decedent; and/or
 - b. in that she was aware of the potential for danger while the dog was unrestrained, yet she failed to warn the plaintiff's decedent of the same; and/or
 - in that she failed to properly and adequately supervise the dog which was owned and/or kept by her; and/or
 - d. in that she knew, or should have known, that failing to properly and adequately supervise the dog, which was owned and/or kept by her, created a danger to members of the public, including the plaintiff's decedent, yet she failed to properly and adequately supervise the dog; and/or
 - e. in that she knew, or in the exercise of reasonable care should have known, of the propensity of the dog to attack and/or bite persons, yet failed to warn the plaintiff's decedent of the same; and/or
 - f. in that she consciously ignored behavioral indicators that the dog presented an unreasonable danger to persons in proximity to the dog, including the plaintiff's decedent.
 - 11. As a result of the aforementioned incident and the willful, wanton, and reckless conduct of the defendant, Maryanne A. Hornish, D'Aleo sustained and suffered

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severe personal injuries and losses including significant bite wounds and lacerations to her lower extremities, resulting in flesh, muscle, and tendon loss; injuries to the nerves, muscles, and soft tissues of her body; and a shock to her entire nervous system, some or all of which resulted in her untimely death.

- 12. As a further result thereof, D'Aleo suffered extreme physical pain, emotional distress, and mental anguish prior to her death.
- 13. As a further result thereof, D'Aleo has been permanently deprived of the opportunity to pursue and enjoy life's activities.
- 14. As a further result thereof, the plaintiff, John F. D'Aleo, has been forced to incur financial obligations for ambulance, hospital, funeral, and burial expenses on behalf of the plaintiff's decedent, Janet P. D'Aleo a/k/a Janet M. D'Aleo.
- 15. The plaintiff, John F. D'Aleo, brings this Count pursuant to §52-555 of the Connecticut General Statutes.

FOURTH COUNT: John F. D'Aleo, Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo v. Neil J. Hornish (§ 22-357)

1. On or about November 15, 2019, the plaintiff, John F. D'Aleo, was appointed Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo ["D'Aleo"] by the Court of Probate, North Central Connecticut Probate District, in the State of Connecticut, and is authorized to act in that capacity.

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- On or about November 6, 2019, and for some time prior thereto, the defendant, Neil J. Hornish, was the owner and/or keeper of a dog named "Dexter."
- 3. On or about November 6, 2019, at approximately 3:00 p.m., D'Aleo was lawfully on the premises located at 584 Thrall Avenue, Suffield, Connecticut.
- 4. At or about that same time and place, the dog owned by the defendant,
 Neil J. Hornish, attacked D'Aleo, knocking her to the ground and bit her savagely,
 maiming and mutilating her lower extremities, thereby causing the plaintiff's decedent to
 sustain and suffer the catastrophic personal injuries and losses hereinafter set forth.
- 5. At all times relevant herein, D'Aleo was not committing a trespass or other tort, and was not teasing, tormenting or abusing the dog owned by the defendant, Neil J. Hornish.
- 6. The defendant, Neil J. Hornish, is liable to the estate of D'Aleo for the personal injuries and losses sustained by the plaintiff's decedent, pursuant to Section 22-357 of the Connecticut General Statutes.
- 7. As a result of the above-described incident involving the dog owned and/or kept by the defendant, Neil J. Hornish, D'Aleo sustained and suffered severe personal injuries and losses including significant bite wounds and lacerations to her lower extremities, resulting in flesh, muscle, and tendon loss; injuries to the nerves, muscles, and soft tissues of her body; and a shock to her entire nervous system, some or all of which resulted in her untimely death.

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- 8. As a further result thereof, D'Aleo suffered extreme physical pain, emotional distress, and mental anguish prior to her death.
- 9. As a further result thereof, D'Aleo has been permanently deprived of the opportunity to pursue and enjoy life's activities.
- 10. As a further result thereof, the plaintiff, John F. D'Aleo, has been forced to incur financial obligations for ambulance, hospital, funeral, and burial expenses on behalf of the plaintiff's decedent, Janet P. D'Aleo a/k/a Janet M. D'Aleo.
- 11. The plaintiff, John F. D'Aleo, brings this Count pursuant to §52-555 of the Connecticut General Statutes.

FIFTH COUNT: John F. D'Aleo, Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo v. Neil J. Hornish

- 1. On or about November 15, 2019, the plaintiff, John F. D'Aleo, was appointed Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo ["D'Aleo"] by the Court of Probate, North Central Connecticut Probate District, in the State of Connecticut, and is authorized to act in that capacity.
- On or about November 6, 2019, and for some time prior thereto, the defendant, Neil J. Hornish, was the owner and/or keeper of a dog named "Dexter."
- 3. On or about November 6, 2019, at approximately 3:00 p.m., D'Aleo was lawfully on the premises located at 584 Thrall Avenue, Suffield, Connecticut.

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- 4. At or about that same time and place, the dog owned by the defendant,
 Neil J. Hornish, attacked D'Aleo, knocking her to the ground and bit her savagely,
 maiming and mutilating her lower extremities, thereby causing the plaintiff's decedent to
 sustain and suffer the catastrophic personal injuries and losses hereinafter set forth.
- 5. This incident and the injuries and losses sustained and suffered by D'Aleo were caused by the negligence and carelessness of the defendant, Neil J. Hornish, in one or more of the following ways:
 - a. in that he knew, or in the exercise of reasonable care should have known, of the propensity of this dog to attack and/or bite persons in proximity to said dog, yet failed to take any action to prevent said dog from attacking and killing the plaintiff's decedent; and/or
 - in that he was aware of the potential for danger while the dog was unrestrained, yet he failed to warn the plaintiff's decedent of the same; and/or
 - in that he failed to properly and adequately supervise the dog which was owned and/or kept by him; and/or
 - d. in that he knew, or should have known, that failing to properly and adequately supervise the dog, which was owned and/or kept by him, created a danger to members of the public, including the plaintiff's decedent, yet he failed to properly and adequately supervise the dog; and/or
 - e. in that he knew, or in the exercise of reasonable care should have known, of the propensity of the dog to attack and/or bite persons, yet failed to warn the plaintiff's decedent of the same.

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- 6. As a result of the negligence and carelessness of the defendant, Neil J. Hornish, D'Aleo sustained and suffered severe personal injuries and losses including significant bite wounds and lacerations to her lower extremities, resulting in flesh, muscle, and tendon loss; injuries to the nerves, muscles, and soft tissues of her body; and a shock to her entire nervous system, some or all of which resulted in her untimely death.
- 7. As a further result thereof, D'Aleo suffered extreme physical pain, emotional distress, and mental anguish prior to her death.
- 8. As a further result thereof, D'Aleo has been permanently deprived of the opportunity to pursue and enjoy life's activities.
- 9. As a further result thereof, the plaintiff, John F. D'Aleo, has been forced to incur financial obligations for ambulance, hospital, funeral, and burial expenses on behalf of the plaintiff's decedent, Janet P. D'Aleo a/k/a Janet M. D'Aleo.
- The plaintiff, John F. D'Aleo, brings this Count pursuant to §52-555 of the
 Connecticut General Statutes.

SIXTH COUNT: John F. D'Aleo, Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo v. Neil J. Hornish (Common Law Recklessness)

1. On or about November 15, 2019, the plaintiff, John F. D'Aleo, was appointed Executor of the Estate of Janet P. D'Aleo a/k/a Janet M. D'Aleo ["D'Aleo"] by the Court of Probate, North Central Connecticut Probate District, in the State of Connecticut, and is authorized to act in that capacity.

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- 2. On or about November 6, 2019, and for some time prior thereto, the defendant, Neil J. Hornish, was the owner and/or keeper of a dog named "Dexter."
- At some time prior to November 6, 2019, the aforementioned dog was involved in an incident in which it bit a person.
- 4. At some time prior to November 6, 2019, the aforementioned dog was involved in an incident in which it bit another dog.
- At all times mentioned herein, the defendant, Neil J. Hornish, failed to register the aforementioned dog with the Town of Suffield, in violation of Section 22-339 of the Connecticut General Statues.
- 6. At all times mentioned herein, the defendant, Neil J. Hornish, failed to provide a valid rabies vaccination certificate to the Town of Suffield, in violation of Section 22-339b of the Connecticut General Statutes.
- 7. At all times mentioned herein, the defendant, Neil J. Hornish, was aware that the aforementioned dog suffered from anxiety, yet chose to discontinue the dog's anti-anxiety medication.
- 8. On or about November 6, 2019, at approximately 3:00 p.m., D'Aleo was lawfully on the premises located at 584 Thrall Avenue, Suffield, Connecticut.
- At or about that same time and place, the dog owned by the defendant,
 Neil J. Hornish, attacked D'Aleo knocking her to the ground and bit her savagely,

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maiming and mutilating her lower extremities, thereby causing the plaintiff's decedent to sustain and suffer the catastrophic personal injuries and losses hereinafter set forth.

- 10. This incident and the injuries and losses sustained and suffered by D'Aleo and/or her estate were caused by the willful, wanton, and reckless conduct of the defendant, Neil J. Hornish, in one or more of the following ways:
 - a. in that he knew, or in the exercise of reasonable care should have known, of the propensity of this dog to attack and/or bite persons in proximity to said dog, yet failed to take any action to prevent said dog from attacking and killing the plaintiff's decedent; and/or
 - b. in that he was aware of the potential for danger while the dog was unrestrained, yet he failed to warn the plaintiff's decedent of the same; and/or
 - in that he failed to properly and adequately supervise the dog which was owned and/or kept by him; and/or
 - d. in that he knew, or should have known, that failing to properly and adequately supervise the dog, which was owned and/or kept by him, created a danger to members of the public, including the plaintiff's decedent, yet he failed to properly and adequately supervise the dog; and/or
 - e. in that he knew, or in the exercise of reasonable care should have known, of the propensity of the dog to attack and/or bite persons, yet failed to warn the plaintiff's decedent of the same; and/or
 - f. in that he consciously ignored behavioral indicators that the dog presented an unreasonable danger to persons in proximity to the dog, including the plaintiff's decedent.

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- 11. As a result of the aforementioned incident and the willful, wanton, and reckless conduct of the defendant, Maryanne A. Hornish, D'Aleo sustained and suffered severe personal injuries and losses including significant bite wounds and lacerations to her lower extremities, resulting in flesh, muscle, and tendon loss; injuries to the nerves, muscles, and soft tissues of her body; and a shock to her entire nervous system, some or all of which resulted in her untimely death.
- 12. As a further result thereof, D'Aleo suffered extreme physical pain, emotional distress, and mental anguish prior to her death.
- 13. As a further result thereof, the plaintiff's decedent, Janet P. D'Aleo a/k/a Janet M. D'Aleo, has been permanently deprived of the opportunity to pursue and enjoy life's activities.
- 14. As a further result thereof, the plaintiff, John F. D'Aleo, has been forced to incur financial obligations for ambulance, hospital, funeral, and burial expenses on behalf of the plaintiff's decedent, Janet P. D'Aleo a/k/a Janet M. D'Aleo.
- 15. The plaintiff, John F. D'Aleo, brings this Count pursuant to §52-555 of the Connecticut General Statutes.

RISCASSI & DAVIS, P.C.

ATTORNEYS AT LAW

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WHEREFORE, the plaintiff claims money damages.

WHEREFORE, the plaintiff claims exemplary and punitive damages as to the Third and Sixth Counts as prescribed by law.

The amount in demand, exclusive of interest and costs, is in excess of FIFTEEN THOUSAND DOLLARS (\$15,000).

I hereby certify that I have knowledge of the financial responsibilities of the plaintiff and deem them sufficient to pay the costs.

Hereof fail not, but of this writ, with your doings thereon, make due service and return according to law.

Dated at Hartford, Connecticut, this 11th day of December, 2019.

By:

Commissioner of the Superior Court

We hereby enter our appearance

For the plaintiff in this action.

of Davies F.C. RISCASSI AND DAVIS, P.C.

Juris No. 50361

RISCASSI & DAVIS, P.C.

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HARTFORD, CT 06126-1557

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