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ONGE & BROUILLARD
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BOX 550, PUTNAM, CT 06260-0550

2

RICHARD CHENEY

VS.

: OCTOBER 22, 2020

: AT PUTNAM

## AMENDED COMPLAINT

## FIRST COUNT: (Jolly John's Truck and Equipment, LLC v. Richard Cheney)

- The plaintiff, Jolly John's Truck & Equipment is a Connecticut limited liability company with a principal place of business at 380 North Main Street in Moosup, .
   Connecticut.
- 2. The defendant is an individual with an address of 42 Oak Drive in Mansfield Center, Connecticut.
- 3. In January, 2018 through July, 2018, the defendant rented a 1973 John Deere pay loader from the plaintiff.
- 4. The amount due for the rental of said equipment is Six Thousand Dollars & 00/100 (\$6,000.00) plus tax of Three Hundred Eighty-One Dollars & 00/100 (\$6,381.00)

  A copy of the invoice is attached hereto as Exhibit "A".
- 5. Despite demand, the defendant has failed, neglected, or refused to pay the same.



- 2. The defendant is Connecticut corporation with a place of business at 26M Bushnell Hollow Road, Baltic, Connecticut, 06330.
- 3. In January, 2018, through July, 2018, Richard Cheney, as agent for and acting on behalf of the defendant, Mattern Construction, Inc., rented a 1973 John Deere pay loader from the plaintiff.
- 4. The amount due for the rental of said equipment is Six Thousand Dollars & 00/100 (\$6,000.00) plus tax of Three Hundred Eighty-One Dolloars & 00/100 (\$6,381.00) A copy of the invoice is attached hereto as Exhibit "A".
- 5. The defendant has failed, neglected, or refused to pay the same.

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- Interest;
- 3. Attorney's fees;
- Court costs; and 4.
- Any other legal or equitable relief to which the plaintiff may be entitled. 5.

This matter is within the jurisdiction of this Court.

Dated at Woodstock, Connecticut this 22 day of October, 2020.

THE PLAINTIFF

Mark R. Brouillard St. Onge & Brouillard

Its Attorneys

sent via electronic mail, to the following self-represented party:

Mr. Richard Cheney (pro se) 42 Oak Drive Mansfield, CT 06250

Mark R.

Commissioner of the Superior/Court

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