

EQUIPMENT, LLC

VS.

: AT PUTNAM

RICHARD CHENEY

: MARCH 1, 2021

**PLAINTIFF'S DISCLOSURE OF EXPERT WITNESSES**

The plaintiff hereby discloses the following expert witness that the plaintiff intends to call at the trial of this matter and/or to introduce the records of this witness.

1. Name of the Expert:

Nicholas Deojay  
380 North Main Street  
Moosup, CT 06354

2. Name of Employer:

Jolly John's Truck & Equipment, LLC  
380 North Main Street  
Moosup, CT 06354

3. Field of Expertise:

Mr. Deojay may be called an expert in rental valuations of heavy equipment, including the rental valuation of a John Deere 644 Pay Loader. Mr. Deojay acquired his expertise through experience in leasing and selling equipment.

4. Subject Matter of the Testimony:

Mr. Deojay is expected to testify concerning the reasonable rental value of a certain 1973 John Deere 644 Pay Loader.

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Mr. Deojay is expected to testify that the reasonable rental value of the 1973 John Deere 644 Pay Loader leased to Richard Cheney individually and/or on behalf of Mattern Construction had a reasonable monthly rental value of \$1,500.00.

6. Substance of the Grounds for Each Such Opinion:

The grounds which formed the basis of Mr. Deojay's opinions, conclusions and findings are his experience in the field of the sale and rental of heavy equipment.

**THE PLAINTIFF**

By: 

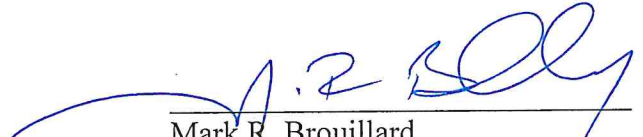
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March 1, 2021 to all pro se parties and Counsel of record, namely:

Mr. Richard Cheney  
42 Oak Drive  
Mansfield, CT 06250

Charles K. Norris, Esq.  
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P.O. Box 510  
Norwich, CT 06360  
Facsimile: 860-887-1744



Mark R. Brouillard  
*Commissioner of the Superior Court*