

ST. ONGE & BROUILLARD
ATTORNEYS AT LAW
POST OFFICE BOX 550, PUTNAM, CT 06260-0550
JURIS NO. 101898 (860) 928-0481

RETURN DATE: MAY 21, 2019 : SUPERIOR COURT
JOLLY JOHN'S : JUDICIAL DISTRICT OF WINDHAM
TRUCK & EQUIPMENT :
VS. : AT PUTNAM
RICHARD CHENEY : APRIL 22, 2019

COMPLAINT

1. 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 payloader 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 (\$381.00) for a total of Six Thousand 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.

WHEREFORE, the plaintiff claims:

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

This matter is within the jurisdiction of this Court.

Dated at Woodstock, Connecticut this 22nd day of April, 2019.

THE PLAINTIFF

By: 

Mark R. Brouillard, of
St. Onge & Brouillard
Its Attorneys

ST. ONGE & BROUILLARD

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STATEMENT OF AMOUNT IN DEMAND

The amount in demand, exclusive of interest and costs is greater than \$15,000.00 and is based in part on an implied promise to pay a sum certain.

THE PLAINTIFF

By: 

Mark R. Brouillard, for
St. Onge & Brouillard
Its Attorneys

EXHIBIT "A"

Jolly John's Truck & Equipment

INVOICE

380 N Main Street
Moosup, CT 06354
Phone 860-912-5481 Fax 860-564-5599

DATE: July 1, 2018
INVOICE # 100
FOR: *Equipment Rental*

Bill To:
Richard Cheney

42 Oak Drive
Mansfield Center, CT 06250
860-428-4860

FILED
905K/280

DESCRIPTION	AMOUNT
Rental of Stock# G571, 1973 John Deere 644 payloader from January 2018-July 2018	\$ 6,000.00
TAX	\$ 381.00
TOTAL	\$ 6,381.00

Make all checks payable to Jolly John's Truck & Equipment
If you have any questions concerning this invoice, please contact Nick Deojay, 860-564-5650,
nick@emailjollyjohns.com