

NO. LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN :
 : JUDICIAL DISTRICT OF LITCHFIELD
V. : AT TORRINGTON
MILOT, ET AL. : FEBRUARY 2, 2022

DEFENDANT HARDY-MASSARO'S ANSWER
AND SPECIAL DEFENSES TO PLAINTIFF'S COMPLAINT

The Defendant, Karen Hardy-Massaró, hereby files her answer and special defenses to Plaintiff's Complaint filed on October 21, 2021 as follows:

1. As to the portion that alleges "The plaintiff has enjoyed an excellent reputation for being an honest, fair and law-abiding person," the Defendant lacks knowledge or information sufficient to form a belief as to its truth and, therefore, leave Plaintiff to his proofs. As to the remaining allegations, it is admitted.

2. Paragraphs 2 through 58, inclusive, are not directed to or against Defendant Hardy-Massaró. Accordingly, the Defendant does not respond to the allegations set forth in these paragraphs.

59. Admitted.

60. It is admitted that on June 11, 2021, in the State of Connecticut, a virtual school meeting occurred regarding the minor child. As to the remaining allegations, it is denied.

61. Denied.

62. Denied.

63. To the extent the statement in this paragraph sets forth a legal conclusion, no response is required. As to the portion that alleges "As a direct and proximate results of Defendant Hardy-Massaró's actions," it is denied. As to the remaining allegations, the Defendant

lacks knowledge or information sufficient to form a belief as to its truth and, therefore, leave Plaintiff to his proofs.

64. Denied.

65. To the extent the statement in this paragraph sets forth a legal conclusion, no response is required. As to any remaining allegation, it is denied.

66. To the extent the statement in this paragraph sets forth a legal conclusion, no response is required. As to any remaining allegation, it is denied.

67. Pursuant to this Court's Order on January 24, 2022, Count Thirty is hereby dismissed.
(Doc. No. 101.20).

68. Pursuant to this Court's Order on January 24, 2022, Count Thirty is hereby dismissed.
(Doc. No. 101.20).

69. Pursuant to this Court's Order on January 24, 2022, Count Thirty is hereby dismissed.
(Doc. No. 101.20).

70. Paragraphs 70 through 79, inclusive, are not directed to or against Defendant Hardy-Massaro. Accordingly, the Defendant does not respond to the allegations set forth in these paragraphs.

Prayer For Relief

The Plaintiff's requested relief is neither admitted nor denied as it seeks legal relief instead of alleging facts.

SPECIAL DEFENSES

First Special Defense

In all of his possible claims, the Plaintiff has failed to state a claim upon which relief can be granted.

Second Special Defense

To the extent the Defendant is sued in her individual capacity, the Defendant is entitled to qualified immunity.

Third Special Defense

If the Plaintiff sustained any of the injuries or losses alleged, they were a proximate result of his own unreasonable conduct.

DEFENDANT
Hardy-Massaró

WILLIAM TONG
ATTORNEY GENERAL

By: /s/ *Samantha C. Wong*

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CERTIFICATION

I hereby certify that on FEBRUARY 2, 2022 a copy of the forgoing was delivered electronically [and served by mail on anyone unable to accept electronic filing] to all attorneys and self-represented parties of record.

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