

DOCKET NO. LLI CV215014019S : SUPERIOR COURT
JON GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
 : AT TORRINGTON
VS. :
RAYMOND J. MILOT, JR. ET AL : JUNE 9, 2022

DEFENDANT'S ANSWER

The Defendant, RAYMOND J. MILOT, JR., by and through her undersigned counsel, hereby files her Answer as to the Plaintiff's Complaint, dated October 8, 2021:

COUNT ONE AS TO JOANNE IURATO

1. The allegations of this Count #1 are directed to another defendant and therefore require no response from this defendant.

COUNT TWO AS TO JOANNE IURATO

1. The allegations of this Count #2 are directed to another defendant and therefore require no response from this defendant.

COUNT THREE AS TO JOANNE IURATO

1. The allegations of this Count #3 are directed to another defendant and therefore require no response from this defendant.

COUNT FOUR AS TO JOANNE IURATO

1. The allegations of this Count #4 are directed to another defendant and therefore require no response from this defendant.

COUNT FIVE AS TO RAYMOND MILOT, JR.

1. Paragraph 1 is denied.
2. Paragraph 11 is admitted.
3. Paragraphs 12-14 are denied as to the Defendant, Raymond Milot, Jr.

COUNT SIX AS TO RAYMOND MILOT, JR.

1. Paragraph 1 is denied.
2. Paragraph 11 is admitted.
3. Paragraphs 14 and 15 are denied as to the Defendant, Raymond Milot, Jr.

COUNT SEVEN AS TO RAYMOND MILOT, JR.

1. Paragraph 1 is denied.
2. Paragraph 11 is admitted.
3. Paragraphs 14 and 15 are denied as to the Defendant, Raymond Milot, Jr.

COUNT EIGHT AS TO HANNAH MILOT

1. The allegations of this Count #8 are directed to another defendant and therefore require no response from this defendant.

COUNT NINE AS TO HANNAH MILOT

1. The allegations of this Count #9 are directed to another defendant and therefore require no response from this defendant.

COUNT TEN AS TO HANNAH MILOT

1. The allegations of this Count #10 are directed to another defendant and therefore require no response from this defendant.

COUNT ELEVEN AS TO HANNAH MILOT AND RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 21-25 are denied as to the Defendant, Raymond Milot, Jr.

COUNT TWELVE AS TO HANNAH MILOT AND RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 21-25 are denied as to the Defendant, Raymond Milot, Jr.

COUNT THIRTEEN AS TO HANNAH MILOT

1. The allegations of this Count #13 are directed to another defendant and therefore require no response from this defendant.

COUNT FOURTEEN AS TO DR. ROBERT KHALIL

1. The allegations of this Count #14 are directed to another defendant and therefore require no response from this defendant.

COUNT FIFTEEN AS TO DR. ROBERT KHALIL

1. The allegations of this Count #15 are directed to another defendant and therefore require no response from this defendant.

COUNT SIXTEEN AS TO DR. ROBERT KHALIL

1. The allegations of this Count #16 are directed to another defendant and therefore require no response from this defendant.

COUNT SEVENTEEN AS TO DR. ROBERT KHALIL

1. The allegations of this Count #17 are directed to another defendant and therefore require no response from this defendant.

COUNT EIGHTEEN AS TO RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-46 are denied as to the Defendant, Raymond Milot, Jr.

**COUNT NINETEEN AS TO RAYMOND MILOT, JR., HANNAH MILOT,
CAMERON MILOT, AND NOAH MILOT**

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-46 are denied as to the Defendant, Raymond Milot, Jr.

**COUNT TWENTY AS TO RAYMOND MILOT, JR., HANNAH MILOT, CAMERON
MILOT, AND NOAH MILOT**

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-46 are denied as to the Defendant, Raymond Milot, Jr.
5. Paragraph 47 is denied as to the Defendant, Raymond Milot, Jr.

**COUNT TWENTY-ONE AS TO RAYMOND MILOT, JR., HANNAH MILOT,
CAMERON MILOT, AND NOAH MILOT**

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-46 are denied as to the Defendant, Raymond Milot, Jr.
5. Paragraph 47 is denied as to the Defendant, Raymond Milot, Jr.

**COUNT TWENTY -TWO AS TO RAYMOND MILOT, JR., HANNAH MILOT,
CAMERON MILOT, AND NOAH MILOT**

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-46 are denied as to the Defendant, Raymond Milot, Jr.
5. Paragraph 48 is denied as to the Defendant, Raymond Milot, Jr.

COUNT TWENTY- THREE AS TO HANNAH MILOT

1. The allegations of this Count #23 are directed to another defendant and therefore require no response from this defendant.

COUNT TWENTY-FOUR AS TO HANNAH MILOT

1. The allegations of this Count #24 are directed to another defendant and therefore require no response from this defendant.

COUNT TWENTY-FIVE AS TO RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraphs 54-58 are denied as to the Defendant, Raymond Milot, Jr.

COUNT TWENTY-SIX AS TO RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraphs 54-58 are denied as to the Defendant, Raymond Milot, Jr.

COUNT TWENTY-SEVEN AS TO KAREN HARDY-MASSARO

1. The allegations of this Count #27 are directed to another defendant and therefore require no response from this defendant.

COUNT TWENTY-EIGHT AS TO KAREN HARDY-MASSARO

1. The allegations of this Count #28 are directed to another defendant and therefore require no response from this defendant.

COUNT TWENTY-NINE AS TO KAREN HARDY-MASSARO

1. The allegations of this Count #29 are directed to another defendant and therefore require no response from this defendant.

COUNT THIRTY AS TO KAREN HARDY-MASSARO

1. The allegations of this Count #30 are directed to another defendant and therefore require no response from this defendant.

COUNT THIRTY -ONE AS TO HANNAH MILOT AND RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraphs 12- 28 are denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-58 are denied as to the Defendant, Raymond Milot, Jr.
5. Paragraphs 70 is denied as to the Defendant, Raymond Milot, Jr.

COUNT THIRTY-TWO AS TO HANNAH MILOT, CAMERON MILOT AND RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraph 16 is denied as to the Defendant, Raymond Milot, Jr.
4. Paragraph 37 is denied as to the Defendant, Raymond Milot, Jr.
5. Paragraphs 71 and 72 are denied as to the Defendant, Raymond Milot, Jr.

COUNT THIRTY-THREE TO RAYMOND MILOT, JR., HANNAH MILOT, CAMERON MILOT, AND NOAH MILOT

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraphs 16 – 28 are denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-58 are denied as to the Defendant, Raymond Milot, Jr.
5. Paragraphs 70 - 75 are denied as to the Defendant, Raymond Milot, Jr.

COUNT THIRTY-FOUR TO RAYMOND MILOT, JR.

1. Paragraph 1 is denied as to the Defendant, Raymond Milot, Jr.
2. Paragraph 11 is admitted as to the Defendant, Raymond Milot, Jr.
3. Paragraphs 16 – 28 are denied as to the Defendant, Raymond Milot, Jr.
4. Paragraphs 37-58 are denied as to the Defendant, Raymond Milot, Jr.
5. Paragraphs 70 – 79 are denied as to the Defendant, Raymond Milot, Jr.

Respectfully submitted,
RAYMOND J. MILOT, JR.

/s/ REBECCA MAYO GOODRICH

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been hand-delivered to all counsel and pro se parties of record this the 9th day of June 2022:

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/s/ REBECCA MAYO GOODRICH

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