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DOCKET NO.: CV 01 0557299 S : SUPERIOR COURT  
 SUSETTE KELO, ET AL. : J.D. OF NEW LONDON  
 V. : at NEW LONDON  
 CITY OF NEW LONDON, ET AL. : FEBRUARY 16, 2001

**ANSWER OF THE DEFENDANTS, CITY OF NEW LONDON  
 AND NEW LONDON REDEVELOPMENT AGENCY**

**FIRST COUNT:**

1. Paragraphs 13, 14, 15, 19, 20, 24, 25, 29, 30, 31, 32, 33, 34, 35, 37, 49, 54, 72, 74 and 92 of the plaintiffs' Complaint are admitted.

2. Paragraphs 3, 6, 7, 8, 9, 11, 12, 42, 44, 96, 101, 102, 103 and 104 of the plaintiffs' Complaint are denied.

3. As to paragraphs 1, 2, 4, 5, 10, 16, 17, 18, 21, 22, 23, 26, 27, 28, 36, 39, 40, 41, 45, 46, 48, 50, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 73, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 93, 94, 95, 97, 98, 99 and 100 of the plaintiffs' Complaint, the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

4. So much of paragraph 38 of the plaintiffs' Complaint is admitted except to that portion that alleges "are undefined and" to which the defendants do not have

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sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

5. So much of paragraph 43 of the plaintiffs' Complaint is admitted except to that portion that alleges that the NLDC intends to acquire and demolish all the structures within the MDP at this time, which is denied.

6. So much of paragraph 47 of the plaintiffs' Complaint as alleges "the remaining homes and businesses in the Fort Trumbull area" is denied, and as to the remaining portion of the paragraph the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

**SECOND COUNT:**

1. The defendants' answers to paragraphs 1 through 99 of the First Count are hereby incorporated and realleged as their answers to paragraphs 1 through 99 of the Second Count as though fully set forth herein.

2. Paragraphs 101, 102, 103 and 104 of the plaintiffs' Complaint are denied.

3. As to paragraph 100 of the plaintiffs' Complaint, the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

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**THIRD COUNT:**

1. The defendants' answers to paragraphs 1 through 99 of the First Count are hereby incorporated and realleged as their answers to paragraphs 1 through 99 of the Third Count as though fully set forth herein.

2. Paragraph 100 of the plaintiffs' Complaint is admitted.

3. Paragraphs 102, 103 and 104 of the plaintiffs' Complaint are denied.

4. As to paragraph 101 of the plaintiffs' Complaint, the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

**FOURTH COUNT:**

1. The defendants' answers to paragraphs 1 through 99 of the First Count are hereby incorporated and realleged as their answers to paragraphs 1 through 99 of the Fourth Count as though fully set forth herein.

2. Paragraphs 102, 103, 104 and 105 of the plaintiffs' Complaint are denied.

3. As to paragraphs 100 and 101 of the plaintiffs' Complaint, the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

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**FIFTH COUNT:**

1. The defendants' answers to paragraphs 1 through 99 of the First Count are hereby incorporated and realleged as their answers to paragraphs 1 through 99 of the Fifth Count as though fully set forth herein.

2. Paragraphs 106, 107 and 108 of the plaintiffs' Complaint are denied.

3. As to paragraphs 100, 101, 102, 103, 104 and 105 of the plaintiffs' Complaint, the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

**SIXTH COUNT:**

1. The defendants' answers to paragraphs 1 through 99 of the First Count are hereby incorporated and realleged as their answers to paragraphs 1 through 99 of the Sixth Count as though fully set forth herein.

2. Paragraphs 102 and 103 of the plaintiffs' Complaint are denied.

3. As to paragraphs 100 and 101 of the plaintiffs' Complaint, the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

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**SEVENTH COUNT:**

1. The defendants' answers to paragraphs 1 through 99 of the First Count are hereby incorporated and realleged as their answers to paragraphs 1 through 99 of the Seventh Count as though fully set forth herein.

2. Paragraphs 101, 106, 107, 108 and 109 of the plaintiffs' Complaint are denied.

3. As to paragraphs 100, 102, 103, 104 and 105 of the plaintiffs' Complaint, the defendants do not have sufficient knowledge or information upon which to form a belief, and therefore leave the plaintiffs to their proof.

**EIGHTH COUNT:**

1. The defendants' answers to paragraphs 1 through 99 of the First Count are hereby incorporated and realleged as their answers to paragraphs 1 through 99 of the Eighth Count as though fully set forth herein.

2. Paragraphs 100, 102 and 103 of the plaintiffs' Complaint are denied.

3. So much of paragraph 101 of the plaintiffs' Complaint as alleges "and thus violate said Charter through actions taken against Plaintiffs" is denied, and the remaining portion of the paragraph is admitted.

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