

SUMMONS - CIVIL

JD-CV-1 Rev. 2-22
C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259;
P.B. §§ 3-1 through 3-21, 8-1, 10-13

For information on
ADA accommodations,
contact a court clerk or
go to: www.jud.ct.gov/ADA.

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov



Instructions are on page 2.

- Select if amount, legal interest, or property in demand, not including interest and costs, is LESS than \$2,500.
- Select if amount, legal interest, or property in demand, not including interest and costs, is \$2,500 or MORE.
- Select if claiming other relief in addition to, or in place of, money or damages.

TO: Any proper officer

By authority of the State of Connecticut, you are hereby commanded to make due and legal service of this summons and attached complaint.

Address of court clerk (Number, street, town and zip code) 95 Washington Street, Hartford, CT 06106	Telephone number of clerk (860) 548 - 2700	Return Date (Must be a Tuesday) March 12, 2024
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<input checked="" type="checkbox"/> Judicial District	G.A.	At (City/Town) Hartford	Case type code (See list on page 2) Major: T Minor: 90
<input type="checkbox"/> Housing Session	<input type="checkbox"/> Number:		

For the plaintiff(s) enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code) Kenny, O'Keefe & Usseglio, P.C., 21 Oak St, Suite 208, Hartford, CT 06106	Juris number (if attorney or law firm) 420163
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Telephone number (860) 246 - 2700	Signature of plaintiff (if self-represented)
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The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	E-mail address for delivery of papers under Section 10-13 of the Connecticut Practice Book (if agreed) tokeefe@kou-law.com
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Parties	Name (Last, First, Middle Initial) and address of each party (Number; street; P.O. Box; town; state; zip; country, if not USA)	
First plaintiff	Name: [REDACTED] Address: [REDACTED]	P-01
Additional plaintiff	Name: Address:	P-02
First defendant	Name: The Bridge Family Center, Inc. Address: c/o Agent for Service: Margaret Hann, 1022 Farmington Avenue, West Hartford, CT 06107	D-01
Additional defendant	Name: Address:	D-02
Additional defendant	Name: Address:	D-03
Additional defendant	Name: Address:	D-04
Total number of plaintiffs: 1		Total number of defendants: 1
<input type="checkbox"/> Form JD-CV-2 attached for additional parties		

Notice to each defendant

1. You are being sued. This is a summons in a lawsuit. The complaint attached states the claims the plaintiff is making against you.
 2. To receive further notices, you or your attorney must file an Appearance (form JD-CL-12) with the clerk at the address above. Generally, it must be filed on or before the second day after the Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to appear.
 3. If you or your attorney do not file an Appearance on time, a default judgment may be entered against you. You can get an Appearance form at the court address above, or on-line at <https://jud.ct.gov/webforms/>.
 4. If you believe that you have insurance that may cover the claim being made against you in this lawsuit, you should immediately contact your insurance representative. Other actions you may take are described in the Connecticut Practice Book, which may be found in a superior court law library or on-line at <https://www.jud.ct.gov/pb.htm>.
 5. If you have questions about the summons and complaint, you should talk to an attorney.
- The court staff is not allowed to give advice on legal matters.

Date 02/20/2024	Signed (Sign and select proper box) 	<input checked="" type="checkbox"/> Commissioner of Superior Court <input type="checkbox"/> Clerk	Name of person signing Timothy L. O'Keefe, Esq.
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If this summons is signed by a Clerk: <ol style="list-style-type: none"> a. The signing has been done so that the plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the plaintiff(s) to ensure that service is made in the manner provided by law. c. The court staff is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this summons at the request of the plaintiff(s) is not responsible in any way for any errors or omissions in the summons, any allegations contained in the complaint, or the service of the summons or complaint. 	For Court Use Only File Date
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I certify I have read and understand the above:	Signed (Self-represented plaintiff)	Date	Docket Number
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Instructions

1. Type or print legibly. If you are a self-represented party, this summons must be signed by a clerk of the court.
2. If there is more than one defendant, make a copy of the summons for each additional defendant. Each defendant must receive a copy of this summons. Each copy of the summons must show who signed the summons and when it was signed. If there are more than two plaintiffs or more than four defendants, complete the Civil Summons Continuation of Parties (form JD-CV-2) and attach it to the original and all copies of the summons.
3. Attach the summons to the complaint, and attach a copy of the summons to each copy of the complaint. Include a copy of the Civil Summons Continuation of Parties form, if applicable.
4. After service has been made by a proper officer, file the original papers and the officer's return of service with the clerk of the court.
5. Use this summons for the case type codes shown below.

Do not use this summons for the following actions:

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| <ul style="list-style-type: none"> (a) Family matters (for example divorce, child support, custody, parentage, and visitation matters) (b) Any actions or proceedings in which an attachment, garnishment or replevy is sought (c) Applications for change of name (d) Probate appeals | <ul style="list-style-type: none"> (e) Administrative appeals (f) Proceedings pertaining to arbitration (g) Summary Process (Eviction) actions (h) Entry and Detainer proceedings (i) Housing Code Enforcement actions |
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Case Type Codes

MAJOR DESCRIPTION	CODE Major/Minor	MINOR DESCRIPTION	MAJOR DESCRIPTION	CODE Major/Minor	MINOR DESCRIPTION
Contracts	C 00	Construction - All other	Property	P 00	Foreclosure
	C 10	Construction - State and Local		P 10	Partition
	C 20	Insurance Policy		P 20	Quiet Title/Discharge of Mortgage or Lien
	C 30	Specific Performance		P 30	Asset Forfeiture
	C 40	Collections		P 90	All other
	C 50	Uninsured/Underinsured Motorist Coverage	Torts (Other than Vehicular)	T 02	Defective Premises - Private - Snow or Ice
	C 60	Uniform Limited Liability Company Act - C.G.S. 34-243		T 03	Defective Premises - Private - Other
C 90	All other	T 11	Defective Premises - Public - Snow or Ice		
Eminent Domain	E 00	State Highway Condemnation	T 12	Defective Premises - Public - Other	
	E 10	Redevelopment Condemnation	T 20	Products Liability - Other than Vehicular	
	E 20	Other State or Municipal Agencies	T 28	Malpractice - Medical	
	E 30	Public Utilities & Gas Transmission Companies	T 29	Malpractice - Legal	
	E 90	All other	T 30	Malpractice - All other	
Housing	H 10	Housing - Return of Security Deposit	T 40	Assault and Battery	
	H 12	Housing - Rent and/or Damages	T 50	Defamation	
	H 40	Housing - Housing - Audita Querela/Injunction	T 61	Animals - Dog	
	H 50	Housing - Administrative Appeal	T 69	Animals - Other	
	H 60	Housing - Municipal Enforcement	T 70	False Arrest	
	H 90	Housing - All Other	T 71	Fire Damage	
Miscellaneous	M 00	Injunction	T 90	All other	
	M 10	Receivership	Vehicular Torts	V 01	Motor Vehicles* - Driver and/or Passenger(s) vs. Driver(s)
	M 15	Receivership for Abandoned/Blighted Property		V 04	Motor Vehicles* - Pedestrian vs. Driver
	M 20	Mandamus		V 05	Motor Vehicles* - Property Damage only
	M 30	Habeas Corpus (extradition, release from Penal Institution)		V 06	Motor Vehicle* - Products Liability Including Warranty
	M 40	Arbitration		V 09	Motor Vehicle* - All other
	M 50	Declaratory Judgment		V 10	Boats
	M 63	Bar Discipline		V 20	Airplanes
	M 66	Department of Labor Unemployment Compensation Enforcement		V 30	Railroads
	M 68	Bar Discipline - Inactive Status		V 40	Snowmobiles
	M 70	Municipal Ordinance and Regulation Enforcement		V 90	All other
	M 80	Foreign Civil Judgments - C.G.S. 52-604 & C.G.S. 50a-30	*Motor Vehicles include cars, trucks, motorcycles, and motor scooters.		
	M 83	Small Claims Transfer to Regular Docket	Wills, Estates and Trusts	W 10	Construction of Wills and Trusts
	M 84	Foreign Protective Order		W 90	All other
	M 89	CHRO Action in the Public Interest - P.A. 19-93			
	M 90	All other			

RETURN DATE: MARCH 12, 2024 : SUPERIOR COURT
[REDACTED] : J.D. OF HARTFORD
V. : AT HARTFORD
THE BRIDGE FAMILY CENTER, INC. : FEBRUARY 20, 2024

COMPLAINT

FIRST COUNT (Corporate Negligence)

1. At all times mentioned herein, the plaintiff, [REDACTED], is the grandmother of the minor plaintiff, [REDACTED] and she brings this action on her behalf.

2. At all times mentioned herein, [REDACTED] was a fourteen (14) year-old girl who was residing in the Town of Harwinton in the State of Connecticut.

3. At all times mentioned herein, the defendant, The Bridge Family Center, Incorporated, was a corporation established under Connecticut law with a principal business address in West Hartford, Connecticut.

4. At all times mentioned herein, the defendant, The Bridge Family Center, Incorporated, was acting through its officers, agents, servants and/or employees.

5. At all times mentioned herein, the defendant, The Bridge Family Center, Incorporated, operated a group temporary shelter facility located at 25 Plymouth Road, in Harwinton, Connecticut.

6. As of February 2021, and for some time prior thereto, The Bridge Family Center, Incorporated had a contract with the State of Connecticut/Department of Children and Families to provide residences, temporary shelter, and residential services to various children in its care and custody, including at the temporary shelter facility located at 25 Plymouth Road, in Harwinton, Connecticut.

7. As of February 7, 2021, [REDACTED] was residing at the group temporary shelter facility located at 25 Plymouth Road, in Harwinton, Connecticut, having been placed there by the State of Connecticut Department of Children and Families.

8. Upon information and belief, [REDACTED] resided at the defendant's facility located at 25 Plymouth Road, in Harwinton, Connecticut from approximately February 3, 2021 to approximately February 7, 2021.

9. During her period of residency at the defendant's Harwinton facility, [REDACTED] was raped and sexually assaulted while at the facility by a facility employee and she has suffered significant physical and emotional harm as a result of the rape/sexual assault.

10. The injuries, harms, and losses suffered by the minor plaintiff enumerated herein occurred because the defendant was negligent in that it:

- a. failed to properly supervise the minor residents of its facility, including the minor plaintiff;

b. failed to properly follow the support plan that it had, or should have had, in place for the minor plaintiff;

c. failed to properly supervise the agents, servants and/or employees that were assigned to work at the Harwinton facility with residents, including the minor plaintiff;

d. failed to properly train the agents, servants and/or employees that were assigned to work at the Harwinton facility with residents;

e. failed to provide the minor plaintiff with twenty-four hour a day/seven day a week supervision; and

f. failed to properly equip the defendant's Harwinton facility with adequate security equipment and/or staff.

11. The defendant's conduct, as described above, created an unreasonable risk of injury to the minor plaintiff, [REDACTED]

12. It was reasonably foreseeable that the defendant's negligence would result in injuries to its residents, including the minor plaintiff, [REDACTED]

13. As a result of the defendant's negligence, the minor plaintiff, [REDACTED] sustained the following injuries, harms, and losses:

- a. a physical and sexual assault and physical and emotional injuries;
- b. exposure to illegal activities, including sexual assault;

- c. great fear, distress, guilt, shame, and humiliation;
- d. an aggravation of her existing emotional and psychological condition; and
- e. permanent psychological and emotional harm.

14. As a further result of the defendant's negligence, the plaintiff will never enjoy the health and wellbeing she did prior to becoming a resident at the defendant's facility, and her ability to enjoy the full spectrum of life's activities has been impaired.

SECOND COUNT (Breach of Special Duty of Care to Children)

1-12. Paragraphs 1 through 12 of the First Count are hereby incorporated and made Paragraphs 1 through 12 of the Second Count as if fully set forth herein.

13. As agents, servants and/or employees of a group residential home for children, those agents, servants and/or employees had unique access to minor children who were young adolescents with significant learning and/or emotional disabilities.

14. The defendant knew that its agents, servants and/or employees, would develop especially close relationships with the residents, including [REDACTED] and knew that a unique degree of trust and confidence would likely develop between its agents, servants and/or employees and its residents, including [REDACTED]

15. At all times that [REDACTED] was a resident of the Harwinton facility and services were being provided by the defendant to [REDACTED] she was entrusted to the custody and care of the defendant.

16. The injuries hereinafter set forth suffered by the minor plaintiff were the proximate and foreseeable result of the breach of a special affirmative duty owed to [REDACTED] by the defendant, acting through its agents, servants and/or employees, in one or more of the following ways:

- a. In that it failed to make proper inquiry or to take action to investigate whether its agents, servants and/or employees were following proper protocols;
- b. In that it failed to act affirmatively and proactively monitor and supervise its agents, servants and/or employees in order to prevent injury to the residents, including [REDACTED];
- c. In that it failed to act affirmatively and proactively to establish protocols, rules, and/or guidelines concerning appropriate and safe interactions with the residents; and
- d. In that it failed to act affirmatively and proactively to take steps to initiate and maintain policies that encouraged residents to make a report about inappropriate activities involving other residents.

17-18. Paragraphs 13 through 14 of the First Count are hereby incorporated and made Paragraphs 17 through 18 of the Second Count as if fully set forth herein,

WHEREFORE, the plaintiff claims damages in accordance with the attached Claim for Relief. Hereof, fail not, but of this writ, with your doings thereon, make due service and return according to law.

Dated at Hartford, Connecticut this 20th day of February 20, 2024.

THE PLAINTIFF,

BY: _____



TIMOTHY L. O'KEEFE
Kenny, O'Keefe & Usseglio, P.C.
Capitol Place
21 Oak Street, Suite 208
Hartford, CT 06106
Tel.: (860) 246-2700
Juris No.: 420163

RETURN DATE: MARCH 12, 2024 : SUPERIOR COURT
[REDACTED] : J.D. OF HARTFORD
V. : AT HARTFORD
THE BRIDGE FAMILY CENTER, INC. : FEBRUARY 20, 2024

CLAIM FOR RELIEF

The plaintiff in the above-captioned matter hereby claims:

1. Money damages which are in excess of \$15,000.00, exclusive of interests and costs;
2. Punitive damages; and
3. Such further legal or equitable relief as the court may deem necessary or appropriate.

THE PLAINTIFF,
[REDACTED]

BY: 

TIMOTHY L. O'KEEFE
Kenny, O'Keefe & Usseglio, P.C.