

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

TOMASA PIZARRO and
JORGE PIZARRO

CASE NO: 3:06-cv-00450 (MRK)

vs.

JUSTIN KASPERZYK, WILLIAM WHITE,
PAUL BICKI, MARK CALAFIORE,
DEAN RUNLETT and CRAIG GUGLIELMO

APRIL 5, 2007

DEFENDANT JUSTIN KASPERZYK'S OBJECTION TO PLAINTIFFS'
APPLICATION FOR PRE-JUDGMENT REMEDY

The plaintiffs, Tomas Pizarro and Jorge Pizarro have filed an Application for Pre-Judgment Remedy dated March 19, 2007. Having instituted a civil action entitled Tomas Pizarro and Jorge Pizarro vs. Justin Kasperzyk, William White, Paul Bicki, Mark Calafore, David K. Runlett and Craig Guglielmo (Court Action No. 3:05cv00450 (MRK), the plaintiffs now seek to attach the interest of Justin Kasperzyk's property located at 271 Chestnut Hill Road, Killingworth, Connecticut in the amount of \$500,000.00.

The defendant, Justin Kasperzyk, opposes the plaintiffs' Application for the following reasons:

- 1) The plaintiffs will be unable to meet their burden of establishing that there is probable cause that a judgment will be entered in their favor;
- 2) The amount of pre-judgment attachment sought, is excessive.
- 3) C.G.S. §7-101 and §7-465 may require the defendant Kasperzyk's employer, the City of New Haven, to protect and save harmless the defendant Kasperzyk from financial loss and expense arising out of any judgment against the defendant Kasperzyk under the allegations of the plaintiffs' action.

A Memorandum of Law in support of the defendant Kasperzyk's Objection to Plaintiffs' Application for Pre-Judgment Remedy is appended hereto.

Respectfully submitted,

THE DEFENDANT, JUSTIN KASPERZYK

BY /s/ _____
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CERTIFICATION

This is to certify that a copy of the above was mailed or electronically delivered this date, to all counsel and pro se parties of record as follows:

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