

NO. CV	:	SUPERIOR COURT/ HOUSING SESSION
ELIJAH HALL, BY AND THROUGH HIS MOTHER AND LEGAL GUARDIAN JENNIFER WILLIAMS	:	JUDICIAL DISTRICT OF NEW HAVEN
vs.	:	
CITY OF NEW HAVEN; BYRON KENNEDY, DIRECTOR OF NEW HAVEN HEALTH DEPARTMENT; PAUL KOWALSKI, DIRECTOR OF ENVIRONMENTAL HEALTH, NEW HAVEN HEALTH DEPARTMENT	:	JUNE 6, 2018

CLERK'S OFFICE
 SUPERIOR COURT
 2018 JUN -6 PM 2:24
 HOUSING SESSION
 AT NEW HAVEN

APPLICATION FOR PRELIMINARY INJUNCTION

Plaintiff Elijah Hall hereby applies to the Court to enter a preliminary injunction to enjoin the Defendants City of New Haven, Dr. Byron Kennedy, and Paul Kowalski from failing to eliminate the lead paint based hazards in the rental apartment at 75 Sherman Avenue, Second Floor, and allowing him to suffer continuous significant lead poisoning beyond his already elevated blood lead level of 7 ug/dl. Plaintiff seeks this injunction for the reason that without such preliminary injunction in place, the Defendants' failure to conduct a proper inspection of the source of his lead poisoning and failure to take over abatement of the lead hazards from the owner causes irreparable harm and injury to him by imposing undue risk to him of further irreversible, life-long neurological damage. In support hereof, Plaintiff Elijah Hall respectfully represents as follows:

1. Plaintiff Elijah Hall is a two year old who has been lead poisoned by

toxic levels of lead in the rental apartment at 75 Sherman Ave., Second Floor, in which he has lived his entire life.

2. Elijah Hall has a blood lead level of 7 ug/dl, which exceeds the level that is safe for a child his age, causing serious risk of development delays and intellectual disabilities on account of his continued exposure to lead hazards.

3. The City of New Haven ["City"] and the Health Department of the City of New Haven ["Health Department"] have been aware of the lead hazards in the apartment since December 2017 but have failed to ensure proper lead poisoning prevention and control, as required by state and city law. During this time, Elijah Hall's blood lead levels have risen.

4. As forth in the Verified Complaint, Elijah Hall is suffering irreparable harm for which there is no adequate remedy at law in that he presently has an elevated blood lead level at which there is well-known, extremely high risk of life-long neurological damage and for which the Defendants are not taking state and city law mandated lead poisoning prevention and control measures.

5. As set forth in the Verified Complaint, Plaintiff Elijah Hall has a substantial likelihood of success on the merits of his claims for relief, as the acts and omissions of the Defendants violate numerous provisions of state and city law.

6. The imminent serious harm to Elijah Hall from continuing to live in an apartment filled with lead poisoning hazards is great, and there is no harm to the Defendants from an order compelling compliance with state and city law.

7. For all the foregoing reasons, as well as those articulated in Plaintiff's Verified Complaint, this Court should grant a preliminary injunction as follows:

- a. Enjoin the Defendants from failing to eliminate the lead-based paint hazards in the rental apartment at 75 Sherman Ave., Second Floor, and allowing a minor child who lives there to suffer continuous significant lead poisoning; and
- b. Enjoin the Defendants from failing to conduct an immediate inspection to determine all sources of lead in the interior, exterior, and soil of the apartment; prepare a lead abatement plan; and abate the property in accordance with the lead abatement plan including relocating the family if necessary to protect from any lead hazards from abatement, in order address the irreparable harm presently being caused to him.

**THE PLAINTIFF,
ELIJAH HALL**

BY:



**Amy Marx
His Attorney
New Haven Legal Assistance
426 State Street
New Haven, CT 06510
203-946-481**

ORDER

The foregoing Application for Preliminary Injunction, having been heard, is hereby
GRANTED.

BY THE COURT

Judge

NO. CV : SUPERIOR COURT/
HOUSING SESSION

ELIJAH HALL,
BY AND THROUGH HIS MOTHER : JUDICIAL DISTRICT OF
AND LEGAL GUARDIAN JENNIFER NEW HAVEN
WILLIAMS

vs. :

CITY OF NEW HAVEN;
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NEW HAVEN HEALTH DEPARTMENT;
PAUL KOWALSKI, DIRECTOR OF
ENVIRONMENTAL HEALTH,
NEW HAVEN HEALTH DEPARTMENT : JUNE 6, 2018

VERIFIED COMPLAINT FOR INJUNCTIVE RELIEF

1. Plaintiff Elijah Hall is a two year old who has been lead poisoned by toxic levels of lead at 75 Sherman Avenue, Second Floor, a rental unit in a two family premises, in which he has lived his since December 2016. The City of New Haven ["City"] and the Health Department of the City of New Haven ["Health Department"] have been aware of the lead paint hazards at this apartment since December 2017 but have failed to ensure proper lead poisoning prevention and control, as required by state and city law.
2. Plaintiff Elijah Hall brings this action by and through his mother and legal guardian, Jennifer Williams.
3. The Health Department was first notified of the imminent, serious risk to Elijah Hall's neurological health from lead paint poisoning in late December 2017 when the State Department of Public Health reported to the Health Department, pursuant to mandatory childhood lead poisoning reporting requirements in which medical laboratories notify the state

which notifies the local health department in instances of childhood lead poisoning, that Elijah's blood lead levels measured 6 micrograms per deciliter (ug/dl). According to Centers for Disease Control guidelines adopted in September 2014, blood levels in excess of 5 ug/dl are associated with adverse, life-long health effects in children under six years old. The City of New Haven has adopted this blood lead level as the basis for mandatory Health Department action to inspect and abate lead hazards causing childhood lead poisoning.

4. Defendant City of New Haven is a municipal corporation, empowered and required by state law and city ordinances to ensure the health and safety of its residents.

5. Defendant Dr. Byron Kennedy is the Director of the Health Department of the City of New Haven ["Director of Health"], empowered and required by state law and city ordinances to be responsible, on behalf of the City, for lead poisoning prevention and controls, with particular responsibilities in the highly important area of childhood lead poisoning prevention and controls. Dr. Kennedy is sued in his official capacity.

6. Defendant Paul Kowalski is the Director of Environmental Health, the division within the Health Department responsible under state law and city ordinances for responding to and investigating all cases of childhood lead poisoning. Mr. Kowalski is sued in his official capacity.

7. The Health Department's malfeasance in this matter dates back to early December 2017.

8. On December 4, 2017, the Health Department received a Laboratory Report of Significant Findings from the Connecticut Department of Public Health setting forth that Elijah

Hall's downstairs neighbor, a child living in the first floor apartment of 75 Sherman Avenue, had a dangerously elevated blood lead level of 11 ug/dl.

9. Based on this laboratory reporting, the Health Department had an obligation to conduct an inspection of the unit on the first floor within five days. The Health Department did not do so.

10. At this point, the Health Department also had an obligation to notify Elijah Hall's family, who lived in the second floor unit, that a child who lived in the first floor unit had lead poisoning and inform Elijah's mother that he should be tested for lead poisoning. The Health Department did not do so.

11. In addition, the Health Department had an obligation not only to inspect the unit on the first floor and notify Elijah Hall's family that he should be tested for lead poisoning, but also to conduct an inspection of Elijah's second floor unit within thirty working days, given that he lived in a building in which another child was lead poisoned. The Health Department did not conduct an inspection of either unit at that time.

12. Elijah Hall had an annual pediatrician appointment in December 2017 in which he had a regular blood lead level screening test.

13. Such test result showed an elevated blood lead level and the State Department of Public Health sent a Laboratory Report of Significant Findings to the Health Department informing that Elijah Hall had a dangerous blood lead level of 6 ug/dl. This report to the Health Department would have arrived by early January at the latest.

14. The Health Department did not conduct an inspection of Elijah Hall's second floor apartment in January 2018, within five days of its notification by the State Department of Health of the lead poisoned child, as required by law.

15. The Health Department did not conduct an inspection of the first floor apartment until April 10, 2018, after the first floor tenants raised the issue of the poisoning of their child, a two year old with an elevated blood lead level of 11 ug/dl, as a defense to summary process action that had been filed by the landlord for nonpayment of rent for the first floor unit.

16. The inspection of the first floor unit, conducted on April 10, 2018, found chipping and flaking toxic lead paint throughout the interior of the apartment and similarly defective lead paint throughout the exterior window sills, window frames, siding, trim, railings, and columns.

17. On April 16, 2018, the Health Department issued a lead abatement order to the owner of 75 Sherman Avenue for abatement of the defective lead paint on the interior and exterior of the first floor unit, and placed a copy of said order on the land records for the City of New Haven on April 24, 2018.

18. In its April 16, 2018 abatement order regarding the first floor unit, the Health Department required that the landlord post a notice entitled "Warning Notice Toxic Lead Levels," at each entrance to the dwelling unit and the common areas within two dates of receipt of the order notice. Such warning was not posted, thus failing to provide legally required notice to Elijah Hall's mother of lead hazards which had been found in the interior and exterior of the first floor unit, which indicates increased risk that her child would suffer lead poisoning based on known lead hazards in the building.

19. On May 3, 2018, the Health Department issued a second lead abatement order to the owner of 75 Sherman Avenue regarding the toxic levels of lead in the soil around the premises which had been found on April 10 but not included in the April 16 abatement order and placed a copy of this second order on the land records for the City of New Haven.

20. The Health Department reviewed and approved the landlord's lead abatement plan for the interior and exterior of the first floor unit, conducted a re-inspection after abatement was alleged by the contractor to have been completed, and issued a formal notice dated May 18, 2018 which states that the abatement was complete for the first floor unit and that the first floor unit was lead safe.

21. On May 22, 2018, the Health Department issued a Release of Order to Remove Paint, discharging the April 16 lead abatement order on the ground that the abatement was complete and the April 16 order had been fulfilled, placing such release on the land record on May 25, 2018.

22. On May 22, 2018, the same day that the Health Department affirmed that the first floor unit was lead free, the Health Department issued a third lead abatement order to the owner of 75 Sherman Avenue, again for soil, which had been found to be even more toxic than indicated in the May 3 soil abatement order, based on further soil testing that had been done on April 30 and May 16 and placed a copy of said third order on the land records for the City of New Haven.

23. On May 24, 2018, Counsel for the tenants on the first floor presented evidence in Housing Court that the Health Department conducted a defective and incomplete post-abatement

inspection of the first floor apartment, consisting of inadequately incomplete observation of the still chipping and flaking lead paint on the exterior of the premises.

24. To date, the first floor unit has not been fully and properly abated. There remains chipping and flaking paint throughout the exterior of the premises. Moreover, the exterior has only had abatement work on the exterior of the bottom half of the premises unit (i.e., doing abatement work up until the top of the windows of the first floor unit). Under the supervision of the Health Department, the contractor did no work at all on the second floor (i.e., top half) of the exterior of the premises.

25. Throughout this time period in which the Health Department was inspecting and ordering abatement of the first floor unit, the Health Department did not conduct any inspection of the second floor unit, notwithstanding its knowledge since December 2017 that Elijah Hall was living in the building and suffering from lead paint poisoning and that another child in the building had been poisoned and that child's unit had tested positive throughout the interior and exterior for lead paint and had been subject to abatement orders.

26. On May 1, 2018, Elijah Hall had his blood lead level tested again, this time measuring 7 ug/dl, having risen since his December 2017 test. Such level was again reported to the city through a Laboratory Report of Significant Findings from the Connecticut Department of Public Health, again requiring mandatory action by the City.

27. On May 7, 2018, New Haven Legal Assistance wrote an official demand letter on behalf of Elijah Hall to the Director of Health for an inspection of the lead hazards in the second floor unit, as required by law.

28. The Health Department conducted an inspection of the Elijah Hall's unit on May 9, 2018, in which it found toxic levels of lead in paint in 153 interior locations of the unit. The inspection did not cover the exterior of the second floor unit, which was either neglected completely by the Health Department notwithstanding its clear knowledge that the entire outside was filled with lead paint hazards or incorrectly assuming that the earlier abatement orders based on the April 10, 2018 inspection of the first floor exterior also covered the second floor exterior.

29. The Health Department refused to share the results of its May 9 inspection of the second floor unit with Elijah Hall's mother.

30. On May 11, 2018, New Haven Legal Assistance made a request, pursuant to the Freedom of Information Act, for the Health Department file regarding Elijah's unit. Such request was refused and remains unfulfilled to date.

31. On May 14, 2018, the Health Department issued a lead abatement order to the owner of 75 Sherman Avenue with respect to the second floor unit.

32. The Health Department refused to share a copy of the abatement order with Elijah Hall's mother.

33. The Health Department placed a copy of said order on the land records for the City of New Haven on May 23, 2018. At this time, Elijah Hall's mother first learned of the location of the lead hazards in the unit. The abatement order for the second floor unit refers to hazard throughout the interior. The inspection order does not refer to the exterior which is known to contain lead hazards as set forth in the abatement order for the first unit.

34. In its May 14, 2018 abatement order regarding the second floor unit, the Health Department required that the landlord post a notice entitled “Warning Notice Toxic Lead Levels,” at each entrance to the dwelling unit and the common areas within two dates of receipt of the order notice. Such warning notice was not posted.

35. In its May 14, 2018 abatement order regarding the second floor unit, the Health Department required that the landlord submit a lead abatement plan within five days, begin work within seven days and fully comply with the order within 30 days, after which the Department of Health would reinspect the unit.

36. The May 14, 2018 order set forth monetary fines and criminal prosecution as remedies were the landlord to fail to comply with the order.

37. To date, the landlord has taken no adequate action to abate the lead-based paint hazards in the interior of the plaintiff’s second floor apartment.

38. To date, the landlord has taken no adequate action to abate the lead-based paint hazards in the exterior of the plaintiff’s second floor apartment, as the already proven inadequate abatement of the exterior of the unit has only been done for the bottom half of the building, not abating at all the window frames or sideboards of the second floor of the building.

39. To date, the Defendants have taken no action to abate the lead hazards in the apartment in the face of the landlord’s failure or refusal to properly act on this hazard.

40. Elijah Hall is suffering irreparable harm for which there is no adequate remedy at law in that he presently has an elevated blood lead level of 7 ug/dl, a level at which there is well-known risk of life-long neurological damage.

41. Elijah Hall's mother has repeatedly sought assistance from the City of New Haven, including the Health Department, to abate the dangerous lead paint conditions in the second floor rental apartment, to no avail.

42. The imminent serious harm to Elijah Hall from continuing to live in an apartment filled with lead paint poisoning hazards is great, and there is no harm to the Defendants from an order compelling compliance with state and city law.

43. Plaintiff Elijah Hall has a substantial likelihood of success on the merits of his claims for relief, as the acts and omission of the Defendants violate numerous provisions of state and city law.

44. Because he is still living in this dangerous apartment for which there is no adequate abatement of the serious known lead hazards, Elijah Hall has no option left but to now respectfully request that the Court issue an injunction to order the City of New Haven to conduct an immediate inspection to determine all sources of lead in the exterior of the unit, to prepare an adequate and complete lead abatement plan, to relocate the family if necessary to protect from any lead hazards from abatement as required by the plan, and complete abatement itself in order to address the landlord's noncompliance and prevent further irreparable harm to his health.

Count One – Violation of New Haven General Ordinances by Failing to Conduct a Timely Investigation and Enforcement of Lead Abatement

1. – 43. Paragraphs 1 through 43 of the Complaint are incorporated herein as paragraphs 1 through 43 of Count One.

39. The City of New Haven functions under the responsibilities and obligations imposed by city ordinances, adopted by the New Haven Board of Alders, under the statutory authority of Conn. Gen. Stat. §§7-148(c)(7)(A) and 148(c)(7)(H)(xv).

40. To further its role to maintain the health and safety of housing, the Board of Alders has in such capacity enacted lead poisoning prevention ordinances, enacted in New Haven Code of Ordinances, Chapter 16, Article III.

41. New Haven General Ordinances §§16-64, 16-65, and 16-66 require that the Health Director must issue orders to landlords to eliminate any lead-based paint hazards that create a health risk to children.

42. Under New Haven General Ordinances §16-61(g), lead poisoning is defined as an “abnormal body burden of lead as defined by the Centers for Disease Control and Prevention.” Currently, the Centers for Disease Control defines lead poisoning as a blood lead level of 5 ug/dl or greater. This level is more stringent than state law (based on a far more current understanding of the severe impacts of lead on childhood health than the state legislature understood when it set the level requiring action at 20 ug/dl) and imposes duties on the Defendants that go beyond those imposed by state law.

43. New Haven General Ordinances impose certain requirements similar to those imposed under state law including: (1) prohibition on cracked, chipped, blistered, flaking, loose, and peeling paint (§16-63); (2) specificity of lead abatement plans, mandating that lead abatement plans identify the location of lead-based paint including soil, describe how all lead-based painted surfaces will be abated, and explain how environment, health, and safety will be

protected (§16-61(e)); and (3) lead paint to be completely removed from any surface that may be accessible to children, with removal to the base surface or covering with an approved durable material, but never repainting a surface with non-lead paint (§16-65).

44. New Haven General Ordinances also impose obligations that go beyond those required in state law, including: (1) repairs to begin within seven days from landlord receipt of violation notice (§16-66(a)(3)); (2) notice of landlord violation to be filed with the city clerk to be placed on the land records within five days of the issuance of the notice (§16-66(a)(6)); and (3) notice that required remedial action has been taken and that the premises are no longer in violation of city law to be filed with the city clerk to be placed on the land records (*id.*).

45. Most importantly, the New Haven General Ordinances expressly state that the Director of Health has a duty to take over the abatement itself if a landlord is not compliant with its abatement responsibilities and empowers the City to impose a lien to recoup costs incurred from taking over the abatement from a non-compliant landlord. See New Haven General Ordinances §16-66(e) and (g).

46. Moreover, when one child in a building is found to have lead poisoning, the City is to inform all the residents of the premises that a lead poisoning hazard has been detected in the premises and inform all children within the premises to be tested for lead poisoning, New Haven General Ordinances §16-66(b), and conduct an inspection within thirty days of the other units in the premises in which a child resides, Conn. Gen. Stat. §119a-111-3(c)(2).

47. Upon notice in early December 2017 that a child on the first floor had lead poisoning, the Health Department was required by city law to notify the family of Elijah Hall to have him tested for lead poisoning and inspect Elijah Hall's second floor unit within thirty days,

48. Upon receipt of a Report of Significant Findings the State Department of Public Health in late December 2017 that Elijah Hall's blood levels met the city law definition of lead poisoning, the Defendants were required to do an inspection and order abatement of any lead hazards.

49. The Defendants did belatedly conduct an inspection of the interior only of the second floor unit on May 9, 2017 and issued an abatement order on May 14, 2018, but has failed to require the landlord to post notice of lead hazards within two days, submit a lead abatement plan within five days, commence abatement work within seven days, and abate all lead hazards causing imminent health risk to Elijah within 30 days. The order set forth fines and criminal punishments that would be imposed were the landlord to not complete the mandated abatement, none of which have been enacted.

50. The landlord has made it clear that he intends to abate only the bottom half of the exterior of the building, not the windows and siding on the second floor, and has not even done a proper abatement to ensure that the lead hazards in the paint on the exterior of the first floor have been remedied.

51. The landlord has neither submitted a lead abatement plan nor pursued any abatement of the interior of the second floor unit and has given no indication that he will

complete abatement of the lead hazards within the time necessary to protect Elijah from continued life-long neurological injury.

52. Elijah is suffering irreparable harm from continuing to live in a unit with unabated lead hazards on the interior and exterior of his apartment.

53. Under city law, the Health Department is obligated to take over the abatement, carry out repairs itself deemed necessary to ensure the safety of the child at the premises, and recoup its costs through a lien placed on the property. See New Haven General Ordinances §§16-66(e) and (g).

54. Therefore, the Defendants have violated New Haven General Ordinances §§16-61 through 16-66, by failing to conduct a proper timely investigation, properly supervise and review landlord abatement plans, monitor abatement actions, and take over abatement as required to protect Elijah Hall's health.

WHEREFORE, Plaintiff Elijah Hall, by and through his mother and legal guardian, Jennifer Williams, requests the following relief from the Court to:

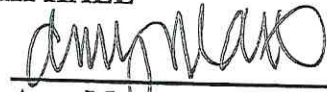
A. Enter a Preliminary and Permanent Injunction enjoining the Defendants from failing to eliminate the lead-based paint hazards in the rental apartment at 75 Sherman Avenue, Second Floor, and allowing a minor child who lives there to suffer continuous significant lead poisoning; and

B. Enter a Preliminary and Permanent Injunction enjoining the Defendants from failing to conduct an immediate inspection to determine all sources of lead in the

interior, exterior, and soil of the apartment; prepare a lead abatement plan; and abate the property in accordance with the lead abatement plan including relocating the family if necessary to protect from any lead hazards from abatement, in order address the irreparable harm presently being caused to him.

**THE PLAINTIFF,
ELIJAH HALL**

BY:



**Amy Marx
His Attorney
New Haven Legal Assistance
426 State Street
New Haven, CT 06510
203-946-4811
amarx@nhlegal.org**

NO. CV : SUPERIOR COURT/
HOUSING SESSION

ELIJAH HALL,
BY AND THROUGH HIS MOTHER : JUDICIAL DISTRICT OF
AND LEGAL GUARDIAN JENNIFER NEW HAVEN
WILLIAMS

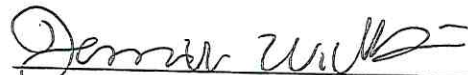
vs. :

CITY OF NEW HAVEN;
BYRON KENNEDY, DIRECTOR OF
NEW HAVEN HEALTH DEPARTMENT;
PAUL KOWALSKI, DIRECTOR OF
ENVIRONMENTAL HEALTH,
NEW HAVEN HEALTH DEPARTMENT : JUNE 6, 2018

VERIFICATION

I, Jennifer Williams, being duly sworn, do hereby depose and state that:

1. I am above the age of eighteen years and understand the obligation of an oath.
2. That I am mother and legal guardian of Elijah Hall.
3. I have read the facts contained in the foregoing Verified Complaint for Injunctive Relief and Application for Preliminary Injunction and that these facts are true to the best of my knowledge and belief.


Jennifer Williams

Subscribed and sworn to this 6th day of June, 2018 at New Haven, Connecticut.


Notary Public

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ORDER TO SHOW CAUSE

WHEREAS the foregoing Verified Complaint for Injunctive Relief and Application for Preliminary Injunction have been presented to the Court, and

WHEREAS upon application of the Plaintiff Elijah Hall, it appears that an order should be issued directly to the Defendants City of New Haven, Byron Kennedy, and Paul Kowalski to appear before this Court to show cause why a preliminary injunction should not issue,

NOW THEREFORE it is ordered that the Defendants CITY OF NEW HAVEN, BYRON KENNEDY, AND PAUL KOWALSKI be summoned to appear before the Superior Court Housing Session, 121 Elm Street, Connecticut, on the _____ day of _____, 20____, at _____ o'clock am/pm, then and there to show cause why the preliminary injunction should not issue against them as requested in the foregoing Verified Complaint and

Application for Preliminary Injunction. Service of this Order shall be made on or before _____, 2017, with due return made to this Court.

Ordered at _____, Connecticut, this ____ day of _____, 20 ____.

BY THE COURT

Judge/Assistant Clerk

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ORDER OF SERVICE

TO ANY PROPER OFFICER: BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to give notice of the foregoing Order to Show Cause to the Defendants CITY OF NEW HAVEN, BYRON KENNEDY, AND PAUL KOWALSKI by serving, in a manner provided by statute for service of process, a true and attested copy of the foregoing Writ, Summons, Verified Complaint, Order to Show Cause, Application for Preliminary Injunction, and this Order of Service, on or before _____, 2018, and due return make.

Ordered at _____, Connecticut, this ___ day of _____, 20__.

BY THE COURT

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APPLICATION FOR WAIVER OF BOND

Pursuant to Conn. Gen. Stat. §52-472, the Plaintiff Elijah Hall requests that the Court hereby waive the requirement of a bond upon the issuance of a preliminary injunction, and in support states the following:

1. As set forth in the Verified Complaint, the imminent serious harm to Plaintiff Elijah Hall from continuing to live in an apartment filled with lead poisoning hazards is great, and there is no harm to the Defendants from an order compelling compliance with state and city law.
2. As set forth in the Verified Complaint, Plaintiff Elijah Hall has a substantial likelihood of success on the merits of his claims for relief, as the acts and omission of the Defendants violate numerous provisions of state and city law.

3. The Plaintiff is indigent and will be unable to provide any substantial bond.

**THE PLAINTIFF,
ELIJAH HALL**

BY:



Amy Marx

His Attorney

New Haven Legal Assistance

426 State Street

New Haven, CT 06510

203-946-4811

ORDER

The court hereby waives the requirement of bond upon the issuance of a preliminary injunction in this action, pending a decision of this court on the plaintiff's complaint.

Ordered at New Haven, Connecticut, this ____ day of _____, 2018.

BY THE COURT

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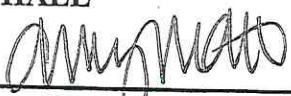
WRIT AND SUMMONS

TO ANY PROPER OFFICER: BY AUTHORITY OF THE STATE OF
CONNECTICUT, you are hereby commanded to summon the Defendants in the above-
entitled action to appear before the Superior Court at the time and place specified in the
foregoing Order, then and there to show cause why relief should not be issued against them
as requested, by serving in the manner provided by statute for the service of process a true
and attested copy of the accompanying Verified Complaint, Application for Preliminary
Injunction, and Order to Show Cause on or before _____, 20____.

Issued at New Haven, Connecticut, this ____ day of _____, 20____.

HEREOF FAIL NOT BUT DUE SERVICE AND RETURN MAKE.

**THE PLAINTIFF,
ELIJAH HALL**

BY: 

Amy Marx
His Attorney
New Haven Legal Assistance
426 State Street
New Haven, CT 06510
203-946-4811
amarx@nhlegal.org