

DOCKET NO. LLI CV-15-6013124S : SUPERIOR COURT

RICHARD BLITZ, TRUSTEE OF THE  
RICHARD BLITZ DEFINED BENEFIT  
PENSION PLAN AND TRUST : J.D. OF LITCHFIELD

VS. : AT LITCHFIELD

GLEN LOVEJOY AND  
KATHLEEN RIISKA-LOVEJOY : October 24, 2016

**APPLICATION FOR PREJUDGMENT REMEDY**

To the Superior Court for the judicial district of Litchfield:

The undersigned represents:

1. That Richard Blitz, Trustee of the Richard Blitz Defined Benefit Pension Plan and Trust commenced this action against Glen Lovejoy and Kathleen Riiska-Lovejoy, both of 30 Cobb City Road, Colebrook, Connecticut, pursuant to the filed Writ, Summons and Complaint on file with the Court. Said Defendants have duly appeared through counsel.
2. That there is probable cause that a judgment in the amount of the prejudgment remedy sought, or in an amount greater than the amount of the prejudgment remedy sought, taking into account any known defenses, counterclaims or set-offs, will be rendered in the matter in favor of the applicant and that to secure the judgment the applicant seeks an order from this court directing that the following prejudgment remedy be granted to secure the sum of \$250,000:
  - a. To attach sufficient property of the defendant to secure such sum.

R3

Dated at Simsbury, Connecticut this 21st day of October 2016.

PLAINTIFF, RICHARD BLITZ, TRUSTEE  
OF THE RICHARD BLITZ DEFINED  
BENEFIT PENSION PLAN AND TRUST

By



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His Attorney  
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JURIS NO. 307336

### **CERTIFICATION OF SERVICE**

I hereby certify a copy of the foregoing, together with the Notice of Application (JD-CV-53) and supporting Affidavit was sent via email to all counsel of record this 24th day of October 2016 as follows:

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