

DOCKET NO. WWM-15-6009136 S

MELANIE PEREZ	:	SUPERIOR COURT
<i>Plaintiff</i>	:	
	:	JUDICIAL DISTRICT OF WINDHAM
v.	:	AT PUTNAM
	:	
STATE OF CONNECTICUT	:	
JUDICIAL DEPARTMENT	:	
<i>Defendant</i>	:	April 27, 2015

DEFENDANT'S MOTION TO DISMISS

Pursuant to Practice Book § 10-30, the State of Connecticut Judicial Department hereby move to dismiss the complaint, or in the alternative, a transfer to the Judicial District of Hartford, due to improper venue.

Further, any claim for punitive damages in this case against the state must be dismissed on the grounds of sovereign immunity. In addition, to the extent Ms. Perez seeks to recover damages for emotional distress, such claims must be dismissed as they cannot be awarded under Connecticut General Statutes § 46a-60.

In further support of this motion, a memorandum of law is attached hereto

DEFENDANT

STATE OF CONNECTICUT
JUDICIAL DEPARTMENT

GEORGE JEPSEN
ATTORNEY GENERAL

By: /s/ Josephine S. Graff
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CERTIFICATION

I hereby certify that on April 27, 2015 a copy of the foregoing Defendant's Motion to Dismiss was mailed, first class postage prepaid and sent via electronic mail, to the following:

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/s/ Josephine S. Graff
Josephine S. Graff
Assistant Attorney General