

DOCKET NO.: WWM-CV-21-5012142-S : SUPERIOR COURT
JANE DOE : J.D. OF WINDHAM
V. : AT PUTNAM
HYDE SCHOOL AT SOUTH WOODSTOCK, INC. : MAY 17, 2024
and HYDE SCHOOL

**ANSWER OF THE DEFENDANT, HYDE SCHOOL AT SOUTH WOODSTOCK
TO REVISED COMPLAINT**

FIRST COUNT: Jane Doe v. Hyde School at South Woodstock, Inc. – Negligence

1. The allegations in paragraph 1 are admitted.
2. The allegations in paragraph 2 are admitted.
3. Those allegations in paragraph 3 which allege that the defendant owned, managed and maintained the school are admitted. As to the remaining allegations in paragraph 3, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
4. The allegations in paragraph 4 are admitted.
5. As to the allegations in paragraph 5, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
6. The allegations in paragraph 6 are admitted.

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7. As to the allegations in paragraph 7, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

8. The allegations in paragraph 8 are admitted.

9. As to the allegations in paragraph 9, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

10. The allegations in paragraph 10 are admitted.

11. As to the allegations in paragraph 11, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

12. As to the allegations in paragraph 12, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

13. The allegations in paragraph 13 are denied.

14. The allegations in paragraph 14 are denied.

15. The allegations in paragraph 15 are denied.

16. The allegations in paragraph 16 are denied.

SECOND COUNT: Jane Doe v. Hyde School at South Woodstock, Inc. – Negligent Infliction of Emotional Distress

1. The allegations in paragraph 1 are admitted.
2. The allegations in paragraph 2 are admitted.
3. Those allegations in paragraph 3 which allege that the defendant owned, managed and maintained the school are admitted. As to the remaining allegations in paragraph 3, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
4. The allegations in paragraph 4 are admitted.
5. As to the allegations in paragraph 5, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
6. The allegations in paragraph 6 are admitted.
7. As to the allegations in paragraph 7, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
8. The allegations in paragraph 8 are admitted.
9. As to the allegations in paragraph 9, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
10. The allegations in paragraph 10 are admitted.

11. As to the allegations in paragraph 11, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

12. As to the allegations in paragraph 12, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

13. The allegations in paragraph 13 are denied.

14. The allegations in paragraph 14 are denied.

15. The allegations in paragraph 15 are denied.

16. The allegations in paragraph 16 are denied.

17. The allegations in paragraph 17 are denied.

18. The allegations in paragraph 18 are denied.

THIRD COUNT: Jane Doe v. Hyde School at South Woodstock, Inc. – Negligent Supervision/Training

1. The allegations in paragraph 1 are admitted.

2. The allegations in paragraph 2 are admitted.

3. Those allegations in paragraph 3 which allege that the defendants owned, managed and maintained the school are admitted. As to the remaining allegations in paragraph 3, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

4. The allegations in paragraph 4 are admitted.

5. As to the allegations in paragraph 5, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

6. The allegations in paragraph 6 are admitted.

7. As to the allegations in paragraph 7, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

8. The allegations in paragraph 8 are admitted.

9. As to the allegations in paragraph 9, the plaintiff is left to her proof because the defendants does not have sufficient knowledge or information to respond to said allegations.

10. The allegations in paragraph 10 are admitted.

11. As to the allegations in paragraph 11, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

12. As to the allegations in paragraph 12, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

13. The allegations in paragraph 13 are denied.

14. The allegations in paragraph 14 are denied.

15. The allegations in paragraph 15 are denied.

16. The allegations in paragraph 16 are denied.

FOURTH COUNT: Jane Doe v. Hyde School at South Woodstock, Inc. – Negligent Infliction of Emotional Distress

The allegations in the Fourth Count have been withdrawn, therefore, the defendant does not respond to those allegations.

FIFTH COUNT: Jane Doe v. Hyde School at South Woodstock, Inc. – Negligent Hiring/Retention

1. The allegations in paragraph 1 are admitted.
2. The allegations in paragraph 2 are admitted.
3. Those allegations in paragraph 3 which allege that the defendants owned, managed and maintained the school are admitted. As to the remaining allegations in paragraph 3, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
4. The allegations in paragraph 4 are admitted.
5. As to the allegations in paragraph 5, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
6. The allegations in paragraph 6 are admitted.
7. As to the allegations in paragraph 7, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.
8. The allegations in paragraph 8 are admitted.

9. As to the allegations in paragraph 9, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

10. The allegations in paragraph 10 are admitted.

11. As to the allegations in paragraph 11, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

12. As to the allegations in paragraph 12, the plaintiff is left to her proof because the defendant does not have sufficient knowledge or information to respond to said allegations.

13. The allegations in paragraph 13 are denied.

14. The allegations in paragraph 14 are denied.

15. The allegations in paragraph 15 are denied.

16. The allegations in paragraph 16 are denied.

SIXTH COUNT: Jane Doe v. Hyde School at South Woodstock, Inc. – Negligent Infliction of Emotional Distress

The defendant does not respond to the allegations in the Sixth Count, as said allegations were withdrawn.

SEVENTH COUNT: Jane Doe v. Hyde School – Negligence

The defendant, Hyde School at South Woodstock, does not respond to the allegations in the Seventh Count, as said allegations are not directed to it.

EIGHT COUNT: Jane Doe v. Hyde School – Negligent Infliction of Emotional Distress

The defendant, Hyde School at South Woodstock, does not respond to the allegations in the Eighth Count, as said allegations are not directed to it.

NINTH COUNT: Jane Doe v. Hyde School – Negligent Supervision/Training

The defendant, Hyde School at South Woodstock, does not respond to the allegations in the Ninth Count, as said allegations are not directed to it.

TENTH COUNT: Jane Doe v. Hyde School – Negligent Infliction of Emotional Distress

The defendant, Hyde School at South Woodstock, does not respond to the allegations in the Tenth Count, as said allegations are not directed to it.

ELEVENTH COUNT: Jane Doe v. Hyde School – Negligent Hiring/Retention

The defendant, Hyde School at South Woodstock, does not respond to the allegations in the Eleventh Count, as said allegations are not directed to it.

TWELFTH COUNT: Jane Doe v. Hyde School – Negligent Infliction of Emotional Distress

The defendant, Hyde School at South Woodstock, does not respond to the allegations in the Twelfth Count, as said allegations are not directed to it.

DEFENDANTS,
HYDE SCHOOL AT SOUTH WOODSTOCK, INC.
and HYDE SCHOOL

By 

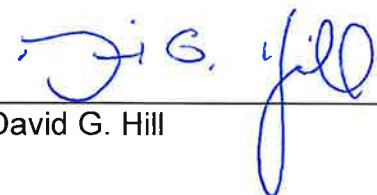
David G. Hill
David G. Hill & Associates, LLC
Their Attorneys

CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on this 17th day of May, 2024, to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery.

Name and address of each party and attorney that copy was or will immediately be mailed or delivered to:

Garrett M. Moore, Sr.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Email: gmoore@mojylaw.com
athompson@mojylaw.com



David G. Hill