

2003 DEC 29 P 2:40

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

**ROBERT J. MALISZEWSKI
PLAINTIFF**

**CIVIL ACTION NO.:
3:03 CV1877 SRU**

vs.

At: Bridgeport

**METROPOLITAN DISTRICT COMMISSION, et al
DEFENDANTS**

December 24, 2003

Skakel v. Murphy

Doc. 771

RESPONSE OF THE METROPOLITAN DISTRICT COMMISSION

The defendant, METROPOLITAN DISTRICT COMMISSION, hereby submits its response to the Plaintiff's Complaint.

PARTIES AND JURISDICTION

- 1]. The Defendant admits paragraphs 1 through 6.
- 2]. The Defendant does not have sufficient information to respond to paragraph 7 and leaves Plaintiff to his proof.
- 3]. The Defendant admits the allegations of paragraph 8.
- 4]. The Defendant denies that any unlawful discrimination and employment practices have occurred in paragraph 9 but admits the remainder of paragraph 9.
- 5]. The Defendant does not have sufficient information to respond to paragraph 10 and leaves Plaintiff to his proof.

FIRST COUNT – AGE DISCRIMINATION

- 1]. The Defendant admits the allegations of paragraphs 11, 12, 13, 14, and 15.

- 2]. The Defendant admits to the allegations of paragraph 16 except it denies the allegations “meaning that he was the next most qualified person for the position”.
- 3]. The Defendant admits the allegations of paragraphs 17, 18, and 19.
- 4]. The Defendant admits the allegations of paragraph 20 except for the allegation that “and did not acquire any additional relevant experience in the interim” which is denied.
- 5]. The Defendant does not have sufficient information to respond to paragraph 21 and leaves Plaintiff to his proof.
- 6]. The allegations of paragraph 22 are denied.
- 7]. The Defendant does not have sufficient information to respond to paragraph 23 and leaves Plaintiff to his proof.
- 8]. The Defendant denies the allegations of paragraphs 24, 25, 26, 27, 28, 29, 30, 31 and 32.

SECOND COUNT – AGE DISCRIMINATION

- 1]. Defendant incorporates herein its responses to paragraphs 11 through 26.
- 2]. The Defendant denies the allegations of paragraphs 34, 35, 36, 37, 38, 39, 40, 41, 42, 43 and 44.

THIRD COUNT – RETALIATION

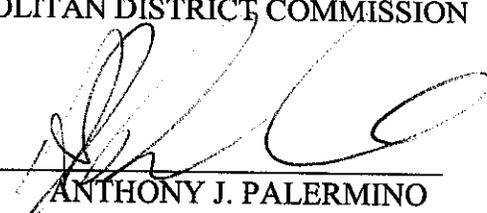
- 1]. Defendant incorporates herein its responses to paragraphs 11 through 26.
- 2]. Defendant admits the allegations contained in paragraph 46.

3]. Defendant denies the allegations of paragraphs 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, and 57.

Defendant,

METROPOLITAN DISTRICT COMMISSION

BY

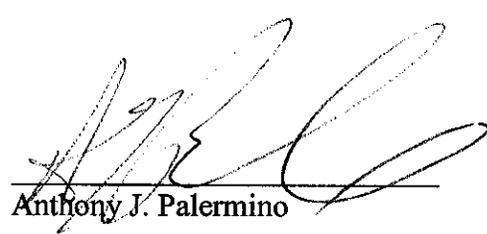

ANTHONY J. PALERMINO

Its Attorney

Law Offices of Anthony J. Palermino
945 Wethersfield Avenue
Hartford, Connecticut 06114
(860) 296-0035
ct05651

CERTIFICATION

I **HEREBY CERTIFY** that a copy of the foregoing was mailed, postage prepaid, on the 24th day of December, 2003 to Attorney Charles D. Houlihan, Jr., 1276 Hopmeadow Street, Simsbury, CT 06070.


Anthony J. Palermino