

***Sikorsky Fin. Credit Union, Inc. v. Butts*, 108 A.3d 228, 232 (Conn. 2015)** (noting that it is within a court’s discretion to determine the rate of post-judgment interest to award under Section 37-3a). Recently, courts within the District of Connecticut have awarded interest under Section 37-3a at a rate of 3.5% or 4% per annum, as consistent with the average bank prime interest rate during the relevant period. See, e.g., ***Carney v. Beracha*, 3:12-cv-180, 2016 WL 10254460, at \*3 (D. Conn. July 22, 2016)** (Underhill, J.) (awarding interest under Section 37-3a at a rate of 3.5% as reflective of “a rough approximation of the average bank prime interest rate during the relevant period” which extended from 2007 through 2016); ***Gilmore v. Pawn King, Inc.*, 3:08-cv-1058, 2016 WL 1180147, at \*11 (D. Conn. Mar. 25, 2016)** (Underhill, J.) (awarding interest at a rate of 3.5% per year as reflective of the average bank prime interest rate from July 2008 through March 2016); ***Nations Roof, LLC v. Carnahan*, 3:14-cv-1753, 2015 WL 3849241, at \*2 (D. Conn. June 22, 2015)** (Meyer, J.) (awarding interest at a rate of 4% per annum “to account for the time-value of the money” from April 1, 2015, and June 22, 2015); ***Cadle Co. v. Fletcher*, 3:11-cv-00794, 2014 WL 362469, at \*4 (D. Conn. Aug. 13, 2014)** (Underhill, J.) (awarding interest at a rate of 4% per annum as reflective of the market conditions from 2007 through 2010). The current bank prime interest rate is 4.75%. See ***Selected Interest Rates H.15*, FED. RESERVE (June 1, 2018)**, <https://www.federalreserve.gov/releases/h15>. Accordingly, the Court finds post-judgment interest in the amount of 4.75% per annum appropriate in this case.

**IV. Conclusion**

Accordingly, the Court hereby enters default judgment against ABW as to breach of the implied warranty of merchantability and CUTPA, and denies the motion to enter default judgment as to breach of express warranty. The Court enters judgment in the total amount of \$33,007.00, including both actual and punitive damages, as well as post-judgment interest at the rate of 4.75% per annum. IT IS SO ORDERED.

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Hon. Vanessa L. Bryant  
United States District Judge

Dated at Hartford, Connecticut: June 4, 2018