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4 STATE OF CONNECTICUT

5 RETURN DATE: JULY 16, 1991

6 DOCKET NUMBER: CV 91 0062496 S

7 HIGH STREET ASSOCIATES : SUPERIOR COURT

8
9 V. : JUDICIAL DISTRICT OF
10 MIDDLESEX AT MIDDLETOWN

11 WILLIAM J. ZISK : SEPTEMBER 27, 1991

12
13 ANSWER AND SPECIAL DEFENSES

14 ANSWER

15 AS TO FIRST COUNT:

16 1. As to the allegations contained in Paragraph 1, the
17 Defendant has no knowledge and/or information sufficient to form
18 a belief and therefore leaves the Plaintiff to its proof.

19 2. As to the allegations contained in Paragraph 2, the
20 Defendant admits that he is an owner of the real property
21 described in Exhibit A attached to the Complaint. As to all
22 other allegations contained in said Paragraph, this Defendant
23 has no knowledge and/or information sufficient to form a belief
24 and therefore leaves the plaintiff to its proof.

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3. As to the allegations contained in Paragraph 3, the Defendant admits that he is an owner of the subject property. As to the calculation of the Defendant's interest, the Defendant specifically denies the correctness of said calculation. Defendant specifically denies the allegation that Plaintiff holds an undivided five/sixth (5/6) interest in real property located at 106 High Street , Higganum, Connecticut. As to all other allegations in said Paragraph, the Defendant has no knowledge and/or information sufficient to form a belief and therefore leaves the Plaintiff to its proof.

SPECIAL DEFENSES

FIRST SPECIAL DEFENSE:

Title to the property described in Paragraph 2 of the complaint in Plaintiff's name, if any does exist, was procured by fraudulent acts and misrepresentations made by the Plaintiff and/or its agents.

SECOND SPECIAL DEFENSE:

Defendant is informed and believes and thereon alleges

that the agreement by which Plaintiff purportedly acquired title to the property described in the complaint is illegal, unenforceable, and the product of a civil conspiracy between Plaintiff and third parties whose names, capacities and affiliations are not fully known to Defendant at this time, the purpose of such conspiracy being the deprivation of Defendants property without just compensation and due process of law.

THIRD SPECIAL DEFENSE:

All parties interested in the property described in the complaint are not presently before the court resulting in a prejudicial non-joinder and misjoinder of parties, in the absence of whom, full and just disposition of the cause cannot occur.

FOURTH SPECIAL DEFENSE:

Defendant is informed and believes and thereon alleges that the consent of all parties necessary to transfer any equitable or legal title to the described real property to Plaintiff was procured by false representation, duress, coercion, undue influence and is further the product of mistake,

incapacity and breach of fiduciary duty by Plaintiff and third parties acting at Plaintiffs instance and request.

FIFTH SPECIAL DEFENSE:

The real property described in Exhibit A to the Complaint describes real property held by Defendant in fee simple absolute free and clear of all legal and equitable claims of Plaintiff, Plaintiffs predecessors in interest, and of any other persons or entities whomsoever or whatsoever by virtue of the terms of a grant from the then exclusive co-owners of the said property of William W. Zisk and Mary A. Zisk on or about July 20, 1952.

SIXTH SPECIAL DEFENSE:

The within action is identical in substance to a prior proceeding before this court that proceeded to judgment in defendant's favor and which bars this action under the principles of Res Judicata and collateral estoppel.

SEVENTH SPECIAL DEFENSE:

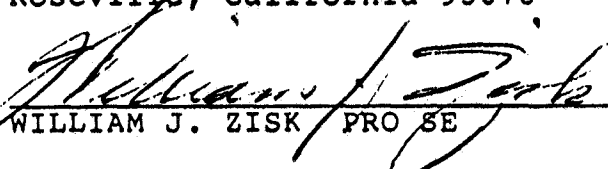
Plaintiff lacks the legal capacity and standing to assert the matters alleged in the Complaint.

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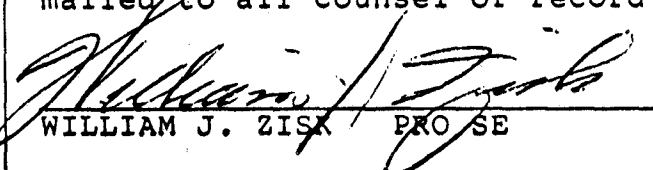
5 THE DEFENDANT:

6 WILLIAM J. ZISK
7 205 Thomas Street
8 Roseville, California 95678

9 By

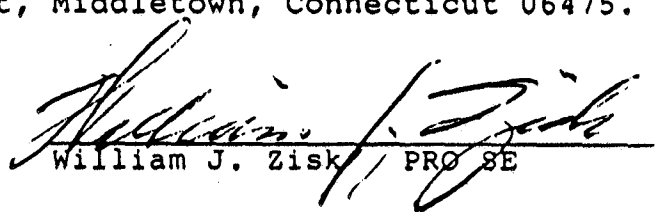

WILLIAM J. ZISK PRO SE

10 I hereby certify that a copy of the foregoing document was
11 mailed to all counsel of record this 27th day of September, 1991.

12 
13 WILLIAM J. ZISK PRO SE

14 CERTIFICATION

15 Pursuant to Section 123(a) of the Connecticut Practice
16 Book, I hereby certify that a copy of the above was mailed on
17 the above date to Joseph E. Milardo, Jr., Esq. Jozus, Milardo
& Thomasson, 73 Main Street, Middletown, Connecticut 06475.

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19 William J. Zisk PRO SE
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