

**SMALL CLAIMS WRIT
AND NOTICE OF SUIT**

JD-CV-40 Rev. 11-24
C.G.S. §§ 51-15, 51-345(g)

*This form is available
in other language(s).*

STATE OF CONNECTICUT
SUPERIOR COURT
SMALL CLAIMS SESSION

www.jud.ct.gov



1.) Address of Court 623 Hartford Rd, New Britain, CT 06053		2.) Case type code (See list on reverse page 1) S90	
3.) Is this claim between a landlord and a tenant? (Select one) ☐ Yes ☒ No		4.) If "Yes" to question #3, the rental property is located in the following town:	
Parties	Name (Last, First, Middle Initial) and Address of Each Party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)		
5.) First plaintiff	Name: RAD Holding Corp dba Earl Baker Address: 84 Colonial Road, Manchester, CT 06042 Telephone: 8605936325 E-mail: ct@earlbaker.com		(Select one) ☐ Individual ☐ DBA ☒ Business Organization P-01
6.) Name, address, and zip code of Attorney for plaintiff(s)		Attorney's Juris Number	Telephone number (w/area code)
7.) First defendant	Name: Nova Retail CT LLC Address: 623 Hartford Rd, New Britain, CT, 06053 Telephone: (959) 208-3344 E-mail: j@novafarms.com		(Select one) ☐ Individual ☐ DBA ☒ Business Organization D-01

☐ For more than 1 plaintiff/defendant, attach Continuation of Parties (form JD-CV-67) and select this box.

8.) If this claim is a consumer debt, which is a debt or obligation made primarily for personal, family, or household reasons, explain why you believe the statute of limitations has not expired.

9.) In the last 6 months, how did you verify that the address given for defendant(s) is accurate?

Select all boxes that apply and provide the dates verified.

☐ I checked town or city records (for example, checking a street list or tax records) on: (date) _____

☐ I checked with the Department of Motor Vehicles on: (date) _____

☐ I received correspondence (letters or other mail) from the defendant with that return address on: (date) _____

☒ I received other proof from the defendant that the address is current (describe details below)

CT Secretary of State lists address as current; we sent USPS Certified Mail Return Receipt Requested to this address.

☐ At least 4 weeks before this action was filed, I sent a letter by first class mail to the defendant at the address used and it has not been returned to me by the United States Postal Service as of: (date) _____

10.) Amount claimed*
5000

Plus Costs

☐ Plus pre-judgment interest**

☐ Plus double damages for security deposit withheld**

You **MUST explain how much you want for each item in section 11 below.

*The Amount claimed cannot exceed \$5,000 or \$15,000 for a home improvement contract case (S20).

*If you are claiming pre-judgment interest or double damages for security deposit withholding, select the box(es).

Do not include these amounts in box 10.

To defendant(s):

11.) You are being sued. The plaintiff(s) claims you owe this money for the following reasons:

The plaintiff, RAD Holding Corp d/b/a Earl Baker, is seeking payment for an unpaid invoice issued to the defendant, Nova Retail CT LLC (Nova Farms). Invoice #1068758, dated August 28, 2025, in the total amount of \$5,776, was due on September 11, 2025, and remains unpaid. The invoice is now 41 days overdue. Despite repeated attempts to obtain payment, the defendant has failed to remit any funds or communicate regarding this obligation since October 9, 2025. The plaintiff therefore seeks \$5,000 of the unpaid balance in this action to resolve the matter, plus allowable court costs and any applicable interest

The person signing below, being duly sworn, states that he or she has read the claim above and the information contained in this form and, to the best of his or her knowledge, information and belief, there is good ground to support the claim and the information is true.

12.) Signed 	Type in name of person signing at left and title, if applicable James Daddario	For Court Use Only (Date Stamp) FILED NOV 17 2025 ASSISTANT CLERK Docket Number HHB CV 25-5039544
Subscribed and sworn to before me on 10-28-25	Signed (Clerk, Notary, Commissioner of the Superior Court) 	
For information on ADA accommodations, contact the Centralized ADA Office at 860-706-5310 or go to: www.jud.ct.gov/ADA/		

Hannah Muska
Notary Public, State of Connecticut

10/27/25, 9:39 AM

Earl Baker Mail - Final Demand



James Daddario <james@earlbaker.com>

Final Demand

James Daddario <james@earlbaker.com>

Fri, Oct 17, 2025 at 11:22 AM

To: Jim Haley <jhaley@novafarms.com>, Jason Teal <j@novafarms.com>, Zach Allen <zach@novafarms.com>, Matt Guertin <matt@novafarms.com>, Nova Farms Accounts Payable <AP@novafarms.com>, Kyle Motola <kyle@earlbaker.com>

Good Morning,

Please find the attached letter regarding final demand for payment.

Cheers,
JD
Earl Baker
www.earlbaker.com
Manchester, CT
860-593-6325



Final Demand for Payment.pdf

70K

Final Demand for Payment

RAD Holding Corp /dba Earl Baker

October 17, 2025

Nova Farms New Britain
623 Hartford Rd
New Britain, CT 06053

Re: Final Demand for Payment of Overdue Invoices #1040054 and #1068758: Total Amount Due: \$7,864.00

Nova Farms team,

I'm reaching out from Earl Baker, a small operation running on tight margins, to make a **final demand** for payment on two overdue invoices totaling **\$7,864.00**. We depend on our partners like you to stick to our agreements, and the money you owe us, \$2,088 from July and \$5,776 from August, is affecting our business operations.

The details are:

- Invoice #1040054, dated July 31, 2025, for \$2,088.00, due August 15, 2025. This covers Cannabis Flower shipments (Gee Forcez Jar 3.5 053 and Super Silver Grapefruit Jar 3.5 052) shipped on July 31, 2025, and originated from Leaf Trade order #1040054. It's been over two months late.
- Invoice #1068758, dated August 27, 2025, for \$5,776.00, due September 11, 2025. This includes Pre Rolls and Cannabis Flower (EARLy Birds - Pre Roll 5 Pack - I.C.M., Midnight Orgy Jar 3.5 057, Peach Diesel 3.5 Jar 054, Stankonya 3.5 Jar 056, Super Buff Cherry 1g Pre Roll, and Trop Gas Jar 3.5 059) shipped on August 28, 2025, and originated from Leaf Trade order #1068758. This rush order was a big ask from you, and we worked hard to get it delivered on time, now it's over a month past due.

I've tried emails and calls, but have not had communication since October 9, 2025. With no communication, I'm forced to send this final demand. Please pay the full \$7,864.00 by October 27, 2025, ten days from now, via the ACH details you have on file. If we don't get paid by this date, we'll have to take action, which could mean handing this over to a collection agency, adding fees and hurting your credit, or filing in Connecticut Small Claims Court for each invoice, where we can recover costs and enforce payment through garnishment or liens.

We'd rather not take either of these routes, and keep this partnership alive, so please call me at 860-593-6325 or email james@earlbaker.com to settle this or sort out any issues. This is going out via email and certified mail to 623 Hartford Rd, New Britain, CT 06053.

Thanks,

James Daddario

Partner

Earl Baker

110 Mountain Rd Fl 2 Suffield, CT 06078-2083

(860) 593-6325

James@earlbaker.com



James Daddario <james@earlbaker.com>

Re: Earl Baker Open Invoices

1 message

James Daddario <james@earlbaker.com>

Tue, Oct 14, 2025 at 5:14 PM

To: Jim Haley <jhaley@novafarms.com>

Cc: Nova Farms Accounts Payable <ap@novafarms.com>, Jason Teal <j@novafarms.com>, Kyle Motola <kyle@earlbaker.com>, Zach Allen <zach@novafarms.com>, Matt Guertin <matt@novafarms.com>

We still have not had an update on these invoices.

Please provide a firm date when these invoices will be paid.

Thanks.

Cheers,
JD
Earl Baker
www.earlbaker.com
Manchester, CT
860-593-6325

On Thu, Oct 9, 2025 at 10:46 AM Jim Haley <jhaley@novafarms.com> wrote:
Good Morning James,

Apologies that these invoices haven't been resolved yet. Looping in additional Nova leadership for visibility and hopefully an update.

Regards,
Jim



James Haley

"Jim"

Director of Procurement, **Nova Farms**

34 Extension St, Attleboro, MA 02703

JHaley@NovaFarms.com | (774) 313-0763

On Thu, Oct 9, 2025 at 10:42 AM James Daddario <james@earlbaker.com> wrote:
Good Morning,

I am following up on the payment of two invoices: one invoice that is overdue by two months and another that is overdue by a month.

At this point - we're looking for a firm date when we can expect payment for both of these invoices.

Please respond to this email as soon as possible.

Cheers,
JD
Earl Baker
www.earlbaker.com
Manchester, CT
860-593-6325

On Mon, Oct 6, 2025 at 11:37 AM Nova Farms Accounts Payable <ap@novafarms.com> wrote:
Hi James,

So sorry for the delay, I am waiting for an update from upper management and I will let you know ASAP!

Nicole Lyons
Accounts Payable
Nova Farms, LLC
34 Extension St
Attleboro MA 02703
E: ap@novafarms.com
W: www.novafarms.com



On Mon, Oct 6, 2025 at 11:32 AM James Daddario <james@earlbaker.com> wrote:
Hey Team,

Checking to see what is going on with these very overdue invoices.

Cheers,
JD
Earl Baker
www.earlbaker.com
Manchester, CT
860-593-6325

On Wed, Oct 1, 2025 at 10:38 AM Nova Farms Accounts Payable <ap@novafarms.com> wrote:
Hi James,

I dont have any confirmed information at this moment but as soon as I do, I will let you know!

Nicole Lyons
Accounts Payable
Nova Farms, LLC
34 Extension St
Attleboro MA 02703
E: ap@novafarms.com
W: www.novafarms.com



On Wed, Oct 1, 2025 at 10:29 AM James Daddario <james@earlbaker.com> wrote:

Hi Nicole,

Thanks for the update and for circling back. Could you please share a firm payment date, or a short plan with dates if partials are needed?

Once payment is scheduled, a quick remittance note would be appreciated. If you need the invoices resent or any paperwork (e.g., W-9), I'm happy to provide it.

Cheers,

JD

Earl Baker

www.earlbaker.com

Manchester, CT

860-593-6325

On Tue, Sep 30, 2025 at 2:40 PM Nova Farms Accounts Payable <ap@novafarms.com> wrote:

Hi James,

I'm so sorry for the delay, we hit a bit of a cash crunch but you are on our priority list to upper management for review! I will update you as soon as I hear back from them, thank you!!

Nicole Lyons

Accounts Payable

Nova Farms, LLC

34 Extension St

Attleboro MA 02703

E: ap@novafarms.com

W: www.novafarms.com



On Tue, Sep 30, 2025 at 12:15 PM James Daddario <james@earlbaker.com> wrote:

10/27/25, 9:41 AM

Earl Baker Mail - Re: Earl Baker Open Invoices

Morning Everyone,

I am following up on two open invoices. One is 45 days overdue and the other is 20 days.

The invoice that is 20 days overdue we went to great lengths to get delivered to you guys as your team asked for delivery with a tight delivery turn around.

We would appreciate getting settled up on these invoices as soon as possible.

Cheers,
JD
Earl Baker
www.earlbaker.com
Manchester, CT
860-593-6325

CV 255039544

INVOICE

Earl Baker
110 Mountain Rd Fl 2
Suffield, CT 060782083

CT@earlbaker.com
+1 (860) 593-6325
www.earlbaker.com



Bill to
Nova Farms - New Britain
623 Hartford Rd
New Britain, Connecticut
06053

Ship to
Nova Farms - New Britain
623 Hartford Rd
New Britain, Connecticut
06053

Shipping info

Ship date: 08/28/2025

Invoice details

Invoice no.: 1068758
Terms: Net 15
Invoice date: 08/27/2025
Due date: 09/11/2025

#	Product or service	Description	Qty	Rate	Amount
1.	Pre Rolls	EARLy Birds - Pre Roll 5 Pack - I.C.M. - .4g prerolls (2g, case of 25)	2	\$450.00	\$900.00
2.	Cannabis Flower	Midnight Orgy Jar 3.5 057 (3.5g, case of 36)	1	\$1,044.00	\$1,044.00
3.	Cannabis Flower	Peach Diesel 3.5 Jar 054 (3.5g, case of 36)	1	\$1,044.00	\$1,044.00
4.	Cannabis Flower	Stankonya 3.5 Jar 056 (3.5g, case of 36)	1	\$1,044.00	\$1,044.00
5.	Pre Rolls	Super Buff Cherry 1g Pre Roll (1g, case of 50)	2	\$350.00	\$700.00
6.	Cannabis Flower	Trop Gas Jar 3.5 059 (3.5g, case of 36)	1	\$1,044.00	\$1,044.00

Total **\$5,776.00**

Note to customer

Originated from Leaf Trade order #1068758

Overdue 09/11/2025

Details

History



DATE	ORDER STATUS	USER	COMMENT
Aug. 27, 2025 9:19:37 p.m. +05	NEW	Nova Farms CT - New Britain	[app:customer] Order created
Aug. 27, 2025 9:19:37 p.m. +05	NEW	Nova Farms CT - New Britain	[app:customer] Added Trop Gas Jar 3.5 059 (3.5g, case of 36) (x36 at 29.00) each
Aug. 27, 2025 9:19:37 p.m. +05	NEW	Nova Farms CT - New Britain	[app:customer] Added Super Buff Cherry 1g Pre Roll (1g, case of 50) (x100 at 7.00) each
Aug. 27, 2025 9:19:37 p.m. +05	NEW	Nova Farms CT - New Britain	[app:customer] Added Stankonya 3.5 Jar 056 (3.5g, case of 36) (x36 at 29.00) each
Aug. 27, 2025 9:19:37 p.m. +05	NEW	Nova Farms CT - New Britain	[app:customer] Added Peach Diesel 3.5 Jar 054 (3.5g, case of 36) (x36 at 29.00) each
Aug. 27, 2025 9:19:37 p.m. +05	NEW	Nova Farms CT - New Britain	[app:customer] Added Midnight Orgy Jar 3.5 057 (3.5g, case of 36) (x36 at 29.00) each
Aug. 27, 2025 9:19:37 p.m. +05	NEW	Nova Farms CT - New Britain	[app:customer] Added EARLY Birds - Pre Roll 5 Pack - I.C.M. - .4g prerolls (2g, case of 25) (x50 at 18.00) each
Aug. 28, 2025 12:12:48 a.m. +05	APPROVING	james@earlbaker.com	[app:vendor] Order status updated
Aug. 28, 2025 12:14:13 a.m. +05	APPROVED	james@earlbaker.com	[app:vendor] Order approved
Aug. 28, 2025 12:16:50 a.m. +05	PACKAGED	james@earlbaker.com	[app:vendor] Order status updated
Aug. 29, 2025 1:05:24 a.m. +05	PACKAGED	james@earlbaker.com	[app:vendor] Posted to QuickBooks
Aug. 29, 2025 1:06:37 a.m. +05	COMPLETE	james@earlbaker.com	[app:vendor] Order completed

RELATED ORDERS

CV258039544