

RETURN DATE: JULY 22, 2025 : SUPERIOR COURT
JOSEPH PANELA : J.D. OF NEW HAVEN
V. : AT NEW HAVEN
CONNECTICUT SOCIAL EQUITY
HOLDINGS, LLC, ET AL : JUNE 2, 2025

COMPLAINT

COUNT ONE – JOSEPH PANELA V. CT SOCIAL EQUITY HOLDINGS, LLC

1. At all times relevant hereto, the defendant, Connecticut Social Equity Holdings, LLC, owned, possessed, operated, maintained, managed and/or controlled real property located at 266 Watertown Road in Morris, Connecticut.
2. On or about June 26, 2023, the plaintiff, Joseph Panela, was an invitee working on the defendant's premises.
3. At said time and place, an unidentified agent, servant and/or employee of the defendant picked up the plaintiff in a utility task vehicle and began to drive.
4. At all times relevant hereto, the unidentified agent, servant and/or employee of the defendant was acting within the course and scope of his employment.
5. At said time and place, as the unidentified agent, servant and/or employee of the defendant was operating said utility task vehicle, he caught a portion of said vehicle on an outrigger post, causing the plaintiff to be ejected from the vehicle.
6. The aforementioned incident was caused by the negligence of the defendant's agent, servant, and/or employee in one or more of the following ways:
 - a. In that he failed to keep his automobile under reasonable and proper control;
 - b. In that he failed to maintain a proper look out for conditions in the area or to pay attention to where he was heading;

- c. In that he failed to apply his brakes in time or in a sufficient fashion so as to avoid the collision;
 - d. In that he failed to otherwise use proper precautions or measures to avoid the collision;
 - e. In that he failed to remain awake and alert during his operation of said vehicle;
 - f. In that he operated said vehicle at an unreasonably high rate of speed.
7. As a direct and proximate result of the defendant's negligence, the Plaintiff did suffer the following injuries and damages some or all of which may be permanent in nature:
- a. Cervical spine injury;
 - b. Thoracic spine injury;
 - c. Lumbar spine injury;
 - d. Cognitive impairment;
 - e. Traumatic brain injury;
 - f. Orbital fracture;
 - g. Headaches;
 - h. Radiculopathy;
 - i. Associated physical pain and suffering.
8. As a direct and proximate result of the aforesaid negligence of the defendant, the Plaintiff, Joseph Panella, has suffered and continues to suffer mental anguish, frustration and anxiety over the fact that he was and remains injured.
9. As a direct and proximate result of the aforesaid negligence of the defendant, the Plaintiff, Joseph Panella, has been forced to expend sums of money for medical care and treatment, medications and therapy and may be forced to incur additional sums in the future.

10. As a direct and proximate result of the aforesaid negligence of the defendant, the Plaintiff, Joseph Panella, has been limited in his ability to engage in his usual occupation as he had prior thereto and may be so limited in the future.
11. As a further result of the defendant's negligence, the Plaintiff, Joseph Panella, has been limited in his ability to enjoy and engage in all of life's activities as he had prior thereto and may be so limited in the future.

COUNT TWO – JOSEPH PANELA V. CT SOCIAL EQUITY, LLC

1. At all times relevant hereto, the defendant, Connecticut Social Equity LLC, owned, possessed, operated, maintained, managed and/or controlled real property located at 266 Watertown Road in Morris, Connecticut.
2. On or about June 26, 2023, the plaintiff, Joseph Panella, was an invitee working on the defendant's premises.
3. At said time and place, an unidentified agent, servant and/or employee of the defendant picked up the plaintiff in a utility task vehicle and began to drive.
4. At all times relevant hereto, the unidentified agent, servant and/or employee of the defendant was acting within the course and scope of his employment.
5. At said time and place, as the unidentified agent, servant and/or employee of the defendant was operating said utility task vehicle, he caught a portion of said vehicle on an outrigger post, causing the plaintiff to be ejected from the vehicle.
6. The aforementioned incident was caused by the negligence of the defendant's agent, servant, and/or employee in one or more of the following ways:
 - a. In that he failed to keep his automobile under reasonable and proper control;
 - b. In that he failed to maintain a proper look out for conditions in the area or to pay attention to where he was heading;

- c. In that he failed to apply his brakes in time or in a sufficient fashion so as to avoid the collision;
 - d. In that he failed to otherwise use proper precautions or measures to avoid the collision;
 - e. In that he failed to remain awake and alert during his operation of said vehicle;
 - f. In that he operated said vehicle at an unreasonably high rate of speed.
7. As a direct and proximate result of the defendant's negligence, the Plaintiff did suffer the following injuries and damages some or all of which may be permanent in nature:
- j. Cervical spine injury;
 - k. Thoracic spine injury;
 - l. Lumbar spine injury;
 - m. Cognitive impairment;
 - n. Traumatic brain injury;
 - o. Orbital fracture;
 - p. Headaches;
 - q. Radiculopathy;
 - r. Associated physical pain and suffering.
8. As a direct and proximate result of the aforesaid negligence of the defendant, the Plaintiff, Joseph Panella, has suffered and continues to suffer mental anguish, frustration and anxiety over the fact that he was and remains injured.
9. As a direct and proximate result of the aforesaid negligence of the defendant, the Plaintiff, Joseph Panella, has been forced to expend sums of money for medical care and treatment, medications and therapy and may be forced to incur additional sums in the future.

10. As a direct and proximate result of the aforesaid negligence of the defendant, the Plaintiff, Joseph Panella, has been limited in his ability to engage in his usual occupation as he had prior thereto and may be so limited in the future.
11. As a further result of the defendant's negligence, the Plaintiff, Joseph Panella, has been limited in his ability to enjoy and engage in all of life's activities as he had prior thereto and may be so limited in the future.

WHEREFORE, the plaintiff claims:

1. Compensatory damages;
2. Such other relief the court deems appropriate.

THE PLAINTIFF,

By:

CHRISTOPHER M. SHEA, ESQ.

Weber & Rubano, LLC

401 Center Street

Wallingford, CT 06492

Phone: (203) 626-9172

Fax: (203) 626-9175

Juris No.: 432211

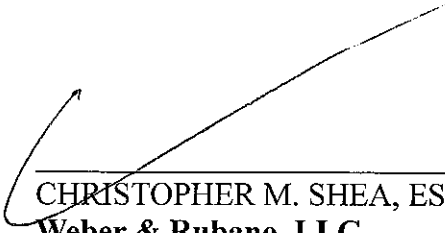
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STATEMENT OF AMOUNT IN DEMAND

The plaintiff claims money damages in excess of \$15,000.00.

THE PLAINTIFF,

By:


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