

SUMMONS - CIVIL

JD-CV-1 Rev. 9-08

C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259, P.B. Secs. 3-1 through 3-21, 8-1

STATE OF CONNECTICUT
SUPERIOR COURT

www.jud.ct.gov

See page 2 for instructions

- "X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.
- "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.
- "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer; BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)		Telephone number of clerk (with area code)	Return Date (Must be a Tuesday)
95 Washington Street, Hartford, CT 06106		(860) 548-2700	October 13, 2009 Month Day Year
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	<input type="checkbox"/> G.A. Number:	At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349) Hartford	Case type code (See list on page 2) Major: T Minor: 90

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code)	Juris number (to be entered by attorney only)
Joseph D. Garrison, 405 Orange Street, New Haven, Connecticut, 06511	21832
Telephone number (with area code)	Signature of Plaintiff (If self-represented)
(203) 777-4425	

Number of Plaintiffs: **1** Number of Defendants: **2** Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)	
First Plaintiff	Name: Gombossy, George Address: 239 Pease Road, East Longmeadow, MA 01028	P-01
Additional Plaintiff	Name: Address:	P-02
First Defendant	Name: The Hartford Courant Company Address: Agent for Service: Corporation Service Company, 50 Weston Street, Hartford, CT 06120-1537	D-50
Additional Defendant	Name: Tribune Co. Address: Agent for Service: Corporation Service Company, 50 Weston Street, Hartford, CT 06120-1537	D-51
Additional Defendant	Name: Address:	D-52
Additional Defendant	Name: Address:	D-53

Notice to Each Defendant

- YOU ARE BEING SUED.** This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
- To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
- If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
- If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
- If you have questions about the Summons and Complaint, you should talk to an attorney quickly. **The Clerk of Court is not allowed to give advice on legal questions.**

Signed (Sign and "X" proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left Joseph D. Garrison	Date signed 9/23/09
If this Summons is signed by a Clerk: a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law. c. The Clerk is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.			For Court Use Only
I certify I have read and understand the above:			File Date
Signed (Self-Represented Plaintiff)	Date		
	9/23/09		
Name and address of person recognized to prosecute in the amount of \$250 Stephen J. Fitzgerald, Esq., (Garrison, et al), 405 Orange St., New Haven, CT 06511			
Signed (Official taking recognizance; "X" proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Date	Docket Number
		9/23/09	

RETURN DATE: October 13, 2009

GEORGE GOMBOSSY,	:	SUPERIOR COURT
	:	
Plaintiff,	:	J.D. OF HARTFORD
	:	
v.	:	AT HARTFORD
	:	
THE HARTFORD COURANT	:	
COMPANY, and TRIBUNE CO.	:	
	:	
Defendants.	:	September 23, 2009
	:	

COMPLAINT

1. The plaintiff, George Gombossy (hereafter "Gombossy"), is a citizen of Massachusetts and a resident of East Longmeadow, Massachusetts.

2. Defendant The Hartford Courant Company (hereafter "Courant") is a wholly-owned subsidiary of defendant Tribune Co., which acquired the Courant in 2000. The Courant has been and remains the largest morning newspaper in the state of Connecticut.

3. Prior to his termination effective August 14, 2009, Gombossy had worked in various capacities for more than 40 years for the Courant.

4. In May, 2002 the Courant published its "News Mission," in which it in part stated: "The Hartford Courant seeks to provide the news Connecticut needs, reported faithfully and fully, with respect for all and favor to none.... To accomplish this mission, we set for ourselves the following goals:.. To raise issues aggressively and constructively, and to expose inefficiency, injustice and corruption in matters of public interest. To extend the circle of public debate as widely as possible, by reflecting the diversity of Connecticut's people and seeking out voices that often are ignored. To guard against arrogance and complacency, and to be open to criticism, remembering our responsibility as the State's largest newspaper.... We believe that by striving

toward these goals with fairness, honesty and compassion, we will benefit the public life of the State and enrich the private lives of our readers."

5. In 2007, Gombossy, as one of the most veteran reporters and editors at the Courant, was selected to launch a weekly consumer Watchdog column. One goal of this column was to be an effective voice of redress for the frustrated and powerless.

6. The intent of the Watchdog column was for Gombossy to open a dialogue with readers. He would air their complaints, seek to mediate or redress their problems and present information that readers might find useful and relevant in their daily lives, as consumers, householders and citizens. All of this was consistent with the Courant's News Mission.

7. By January 2008, the column had surpassed all expectations. It had become one of the most widely read features in the Courant, had made an impact at the state government level and in corporate headquarters in Connecticut and elsewhere in the country. The Courant devoted significant resources to marketing Gombossy as the Watchdog.

8. According to Gombossy's performance review in January, 2008 much of the credit for the column's success was due to Gombossy. His performance rating for the year 2007, overall, was Exceptional.

9. In June, 2009 Gombossy received his performance review for the period from January 6, 2008 to January 4, 2009. For 2008, Gombossy's overall performance exceeded expectations. His attitude was rated as enthusiastic and always positive - "George has made a name for himself -- and this company."

10. In March, 2009, defendant Tribune Co. announced that it would merge the newspaper operations of the Courant with two television stations. It named Richard Graziano, then Senior Vice President/General Manager of the two television stations, to be Publisher of the

Courant. In or about late April, Tribune Co. appointed Jeff Levine, an executive with a marketing background, as the Courant's new senior vice president/director of content.

11. Before Levine began his Courant job, Gombossy had written a Watchdog column disclosing numerous serious complaints from Aeillo Plumbing's customers and that Aeillo Plumbing was under state investigation for allegedly illegal activities.

12. Shortly after Mr. Levine joined the Courant, Levine called Gombossy into a meeting. Levine said he had received a complaint from Aeillo Plumbing, that Aeillo was upset that Gombossy was picking on them, and that Aeillo was a major advertiser (initially claiming that Aeillo was or would be spending \$500,000 a year) and the newspaper could not afford to have Aeillo angry at it. He told Gombossy that he should go to Aeillo's offices and "be nice" to them.

13. Gombossy refused, stating that such an act would be unethical and he would not do it. He told Levine that Levine would have to fire him before he would comply with that request.

14. On July 2, Gombossy published, in his Watchdog blog, a customer complaint made against a Courant advertiser, Price Chopper. The customer's complaint was posted, at 10:26 AM, exactly as it was received, with the headline: "Price Chopper complaint: customer claims crab advertisement false." At 2:28 PM on the same day, Gombossy posted Price Chopper's response to the consumer's complaint, which it said provided "verifiable answers to your questions." Price Chopper did not complain to or about Gombossy.

15. Levine was in Florida on July 2, but on July 9, he e-mailed the Assistant Managing Editor and the Managing Editor, stating in part: "Did he give us a heads up before writing about a major client?"

16. Levine later claimed, to Gombossy, that Price Chopper canceled a \$100,000 advertising campaign that they were intending to run in the Courant.

17. Until late July, Gombossy published his blog without specific rules from higher management. Gombossy had been highly praised for both his Watchdog column and his blog, no restrictions had been set and he had never been told to publish his blog in any different manner.

18. At a meeting held on July 22, however, Levine told Gombossy that he (Levine) will decide whether to continue to run the column and the blog, and who will write them. He said that Gombossy could continue but he did not want Gombossy to annoy any advertisers, and that Gombossy was required to alert Levine if he planned to write any columns that might negatively reflect on an important advertiser. Gombossy requested and received a list of major advertisers.

19. Upon information and belief, other reporters had also been warned about writing articles critical about advertisers.

20. Gombossy was in the process of writing an article about a well-known mattress company, Sleepy's, because Gombossy learned that the Connecticut Attorney General's Office was investigating complaints from customers of Sleepy's that it was selling used mattresses misrepresented as new ones. Gombossy told his editors that he intended to publish an article covering the subject, and he gave a draft of the article to them. Sleepy's was on the list of advertisers.

21. The Sleepy's article was scheduled to be published on August 2, but was held back without explanation.

22. On August 3, Gombossy was called into his supervisor's office. He was told his position was being eliminated, that a new position was being created that would not include investigative reporting and that the salary for that position would be less than half of what

Gombossy was presently earning. Gombossy was not asked to apply for the job nor was the job offered to him. He was directed to go immediately to the Human Resource Director's office, where he was given two weeks' continuation before having to leave the premises.

23. Gombossy's last day with the Courant was August 14, 2009.

24. The Courant has provided different, shifting and false explanations for

Gombossy's termination, as follows:

Richard Graziano, the Publisher, stated that Gombossy was a "disgruntled employee;"

The Courant's "official company statement" was that "Mr. Gombossy's position was eliminated "and that although "he was made aware" of the new position he "did not express interest;"

The Managing Editor stated that Gombossy was offered an opportunity to apply but failed to do so;

The Courant instructed its telemarketers to tell readers who inquired about Gombossy to say he "resigned."

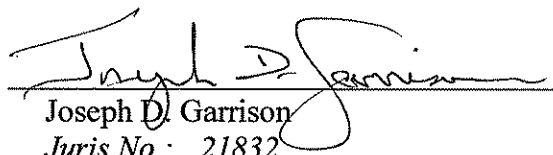
25. The preponderance of the evidence, however, is that Gombossy was discharged on account of his exercise of speech on matters of public concern and/or his insistence on maintaining consumer trust in the Courant as a news organization.

26. Gombossy's discharge violated Connecticut General Statutes section 31-51q.

27. As a result of his wrongful discharge, Gombossy will suffer past and future economic losses, including fringe and retirement benefits.

WHEREFORE, Gombossy requests that this Court award the following damages:

1. All past and future economic and benefit losses;
2. Punitive damages;
3. Reasonable attorneys fees and costs;
4. Statutory interest;
5. Any other remedy that may appear to be just and proper.

By: 
Joseph D. Garrison
Juris No.: 21832
GARRISON, LEVIN-EPSTEIN, CHIMES,
RICHARDSON & FITZGERALD, P.C.
405 Orange Street
New Haven, Connecticut 06511
Ph: (203) 777-4425
Fax: (203) 776-3965
jgarrison@garrisonlaw.com

Please enter my appearance on behalf of Plaintiff.

RETURN DATE: October 13, 2009

GEORGE GOMBOSSY,	:	SUPERIOR COURT
	:	
Plaintiff,	:	J.D. OF HARTFORD
	:	
v.	:	AT HARTFORD
	:	
THE HARTFORD COURANT	:	
COMPANY, and TRIBUNE CO.	:	
	:	
Defendants.	:	September 23, 2009
	:	

STATEMENT OF AMOUNT IN DEMAND

The plaintiff claims damages in excess of \$15,000.

By:



Joseph D. Garrison

Juris No.: 21832

GARRISON, LEVIN-EPSTEIN, CHIMES,
RICHARDSON & FITZGERALD, P.C.
405 Orange Street
New Haven, Connecticut 06511
Ph: (203) 777-4425
Fax: (203) 776-3965
jgarrison@garrisonlaw.com