

**SUPERIOR COURT OF CONNECTICUT**  
**Complex Litigation Docket at Hartford**

INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS,  
LOCAL 825,

Plaintiff,

v.

UNIFORMED PROFESSIONAL FIRE FIGHTERS  
ASSOCIATION OF CONNECTICUT, INC.,

Defendant.

Case No. X07-HHD-CV-18-6101218-S

**MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

January 6, 2018

AND NOW comes Plaintiff International Association of Fire Fighters, Local 825 (“Local 825”), pursuant to Connecticut Practice Book § 17-44, by and through its undersigned attorneys, and moves this Court for summary judgment as to Count One of its Third Amended Complaint, because there is no genuine issue of material fact that Local 825 terminated its legislative only membership in the Uniformed Professional Fire Fighters Association of Connecticut, Inc. (“UPFFA”), fully and completely disaffiliating from the UPFFA on or about January 4, 2016, and that such termination was effective no later than January 1, 2017. Judgment should be granted in favor of Local 825 as a matter of law. A Memorandum of Law is attached to this Motion, along with the following exhibits:

- A. Excerpts from Transcript of Hearing on Motion for Temporary Injunction, Nov. 29, 2018
- B. Excerpts from Transcript of Hearing on Motion for Temporary Injunction, Dec. 6, 2018
- C. Plaintiff’s Ex. 16, Hearing on Motion for Temporary Injunction, entered Nov. 29, 2018

**ORAL ARGUMENT REQUESTED**  
**TESTIMONY NOT REQUIRED**

WHEREFORE, Plaintiff Local 825 respectfully requests that the Court grant its Motion for Partial Summary judgment as to Count One of its Third Amended Complaint.

**[Proposed] ORDER**

AND NOW, upon consideration of the foregoing Motion for Partial Summary Judgment, and finding that good cause exists, said motion is hereby GRANTED, and IT IS FURTHER ORDERED that:

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Dated: \_\_\_\_\_

The Honorable Judge Thomas G. Moukawsher

Respectfully submitted,

Dated: January 6, 2018

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*//s// Craig C. Fishbein, Esq. 420267*

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*Attorneys for Plaintiff, International Association  
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**CERTIFICATE OF SERVICE**

I certify that on January 6, 2018, a copy of the foregoing Motion for Partial Summary Judgment and any related exhibits in support thereof will be forwarded to the below counsel of record:

Nancy E. Valentino  
GESMONDE, PIETROSIMONE & SGRIGNARI, LLC  
3127 Whitney Avenue  
Hamden, Connecticut 06518

Dated: January 6, 2018

By:           //s// Craig C. Fishbein, Esq. 420267          

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