

DOCKET NO.:	: SUPERIOR COURT
	: JUDICIAL
LORI HOPKINS-CAVANAGH	: DISTRICT OF NEW
	: LONDON
v.	:
YONA GREGORY, individually	:
and THE LAW OFFICE OF YONA GREGORY, LLC	:
and LLOYD L. LANGHAMMER, individually	:
and LAW OFFICES OF LLOYD L. LANGHAMMER, LLC	: RETURN DATE:
	: APRIL 14, 2026

This action arises from the Defendants’ misuse of litigation and related conduct directed toward the Plaintiff following a dispute arising from a real estate transaction. The prior action alleged defamation based on statements made by the Plaintiff during that transaction. On March 21, 2023, the Superior Court (Goodrow, J.) dismissed those claims after determining that the statements at issue constituted protected opinion and were not actionable as defamation.

Despite the lack of probable cause for the underlying claims, the Defendants initiated and continued the litigation in a manner that interfered with the Plaintiff’s real estate business, damaged her professional reputation, and caused substantial financial and personal harm. The Plaintiff brings this action to recover damages resulting from the Defendants’ vexatious litigation, abuse of legal process, interference with business relationships, and related conduct.

COMPLAINT

I. PARTIES

1. The Plaintiff, Lori Hopkins-Cavanagh, is an individual dwelling in North Stonington, Connecticut.
 2. At all relevant times the Plaintiff was engaged in real estate brokerage and development activities in New London County, Connecticut.
 3. The Plaintiff also operated through Shoreviews, LLC, a Connecticut limited liability company involved in real estate brokerage activities.
 4. The Defendant Yona Gregory is an attorney licensed in the State of Connecticut and maintains a law practice in New London County.
 5. The Defendant Law Office of Yona Gregory is a Connecticut law practice located in New London County.
 6. The Defendant Lloyd L. Langhammer is an attorney licensed in Connecticut who maintains offices in New London, Connecticut.
 7. The Defendant Law Offices of Lloyd L. Langhammer, LLC is a Connecticut law firm located in New London County.
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II. JURISDICTION AND VENUE

8. Venue is proper in the Judicial District of New London because the events giving rise to this action occurred in New London County.

9. Upon information and belief, the Defendants Yona Gregory and Lloyd L. Langhammer maintained a professional relationship within the New London legal community and operated their law practices from offices located within the same building owned by Defendant Gregory in New London, Connecticut. The proximity of the Defendants' law offices and their ongoing professional interactions provided opportunities for communication and coordination regarding the litigation and conduct described in this Complaint.
10. The underlying litigation referenced herein was filed and litigated in the Connecticut Superior Court, Judicial District of New London.
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III. PROCEDURAL HISTORY OF PRIOR ACTION

11. On September 3, 2021, Defendant Yona Gregory commenced litigation against the Plaintiff. The litigation was initially prosecuted by Attorney Lloyd L. Langhammer of the Law Offices of Lloyd L. Langhammer, LLC, who entered an appearance and initiated pleadings and motions on behalf of the Gregory plaintiffs. Thereafter, Attorney William Gadbois entered an appearance on behalf of the Gregory plaintiffs and appeared in court on their behalf while Attorney Langhammer remained counsel of record in the case.
12. The case was titled **GREGORY, YONA Et Al v. HOPKINS-CAVANAGH, LORI Et Al.**
13. Docket No. **KNL-CV-21-6053115-S.**

14. The claims asserted against the Plaintiff arose from statements made by the Plaintiff during a professional real estate transaction.
 15. The Plaintiff denied the allegations.
 16. The Plaintiff asserted that the statements were protected speech and opinion.
 17. Any disagreement regarding compensation could have been addressed through routine business or contractual processes rather than the initiation of litigation alleging defamation.
 18. The Plaintiff filed Special Motions to Dismiss pursuant to Connecticut General Statutes §52-196a.
 19. On March 21, 2023, the Superior Court (Goodrow, J.) granted the Plaintiff's Special Motions to Dismiss and dismissed the claims asserted against the Plaintiff. The Court concluded that the statements at issue in the email were expressions of opinion protected by the First Amendment and were not actionable as defamation. The dismissal terminated the claims against the Plaintiff in her favor.
 20. A true and accurate copy of the Court's Memorandum of Decision dated March 21, 2023 is attached hereto as **Exhibit A**.
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IV. COUNTERCLAIM PROCEDURAL HISTORY

21. On December 16, 2022, during the pendency of the Gregory litigation, the Plaintiff filed a formal objection to the motion of her then-counsel, Attorney Christian Young, seeking to withdraw from representation. In that filing, the Plaintiff documented that multiple pre-

trial proceedings had occurred off the record and behind closed doors, that her anti-SLAPP motions had not been heard despite repeated requests, and that she had been denied transcripts and the opportunity to participate in discussions affecting the course of the litigation.

22. The Plaintiff's objection further documented that the failure to hear the anti-SLAPP motions, the denial of transcripts, and the closed-door meetings among counsel and court personnel placed the Plaintiff at a severe procedural disadvantage and deprived her of meaningful access to the court. a violation of her due process rights expressed in the First and Sixth Amendments.
23. A true and accurate copy of the Plaintiff's Objection to Attorney Young's Motion to Withdraw dated December 16, 2022 is attached hereto as **Exhibit E**.
24. Despite the filing of the Special Motions to Dismiss pursuant to Connecticut General Statutes §52-196a, which are intended to be heard on an expedited basis, the motions were not addressed by the Court for an extended period of time. The litigation continued for many months while the Plaintiff remained subject to the burdens of the lawsuit, including legal expenses, professional disruption, and ongoing harassment, before the Court ultimately granted the motions and dismissed the claims on March 21, 2023.
25. Following the withdrawal of Attorney Young, the Plaintiff was unable to secure replacement counsel for Shoreviews, LLC. Because Connecticut law requires a limited liability company to appear through counsel, Shoreviews, LLC could not continue to participate in the litigation. As a result, and under the financial and procedural pressures created during the pendency of the Gregory litigation, the Plaintiff ultimately dissolved Shoreviews, LLC.

26. On January 10, 2023, the Plaintiff filed a counterclaim asserting vexatious litigation and related claims arising from the conduct of the Defendants during the underlying action.
27. On June 30, 2023, the Court dismissed the Plaintiff's counterclaim on jurisdictional grounds, ruling that the counterclaim had been filed while the underlying action was still pending and was therefore premature.
28. The Court did not adjudicate the merits of the vexatious litigation claim.
29. The present action is brought after the termination of the prior litigation.
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V. HARASSMENT DURING LITIGATION

30. During the pendency of the Gregory litigation the Plaintiff and her family were subjected to repeated harassment.
31. For the entire duration of the Gregory litigation, the Plaintiff received numerous anonymous mailings at her residences, containing offensive and humiliating materials. These materials included condoms, tampons, and written messages mocking the Plaintiff for representing herself in court. Without her consent or desire, the Plaintiff was subscribed to dozens of magazines and newspapers resulting in a barrage of junk mail and invoices. Several mailings referenced presiding Judge Robert Young, and another included Attorney Langhammer's logo and contact information while ridiculing self-representation. The majority mocked the Plaintiff for appearing sui juris or pro se.
32. The Plaintiff's husband, Timothy Cavanagh, personally witnessed the harassment directed toward the Plaintiff and the impact it had upon the Plaintiff's family and business. Mr. Cavanagh documented the threatening mail, attacks on the Plaintiff's

professional reputation, and the effect that the Gregory litigation and related conduct had on Plaintiff's business and family. A true and accurate copy of the Affidavit of Timothy Cavanagh is attached hereto as **Exhibit B**.

- 33.** The timing and circumstances surrounding the harassment are significant. The harassment began during the pendency of the Gregory litigation and continued while the Plaintiff was defending against the claims asserted in that action.
- 34.** During the litigation the Plaintiff repeatedly reported the harassment to the Court and to counsel. In correspondence produced during the litigation, Attorney Lloyd L. Langhammer stated that he would inform federal authorities "who is doing this" in reference to the harassment directed toward the Plaintiff. A true and accurate copy of the Attorney Langhammer's Email Harassment Admission is attached hereto as **Exhibit F**.
- 35.** Despite indicating that he knew who was responsible for the harassment, the court took no action to identify or stop the conduct. The harassment continued while Attorney Langhammer remained involved in the litigation.
- 36.** The harassment only ceased shortly before Attorney William Gadbois entered an appearance and began appearing in court on behalf of the Gregory plaintiffs while Attorney Langhammer remained counsel of record.
- 37.** Upon information and belief, the harassment was carried out by individuals associated with or acting in coordination with persons involved in the Gregory litigation. Furthermore, the timing, content, and cessation of the conduct corresponded directly with the involvement of Attorney Langhammer in the litigation.

VI. BUSINESS INTERFERENCE

38. At the time of the Gregory litigation the Plaintiff was engaged in real estate brokerage.
39. The Plaintiff represented the seller of tenant occupied property located on Carriage Trail in Ledyard, Connecticut.
40. During that transaction the tenant occupying the property engaged a real estate agent to represent her, in a pre-existing option to purchase. For unknown reasons, the agent engaged in hostile conduct and communications directed at the Plaintiff and the Seller.
41. The agent introduced Attorney Yona Gregory as representing the tenant and thereafter engaged in hostile communications and conduct directed toward the Plaintiff.
42. Upon notice of Gregory's involvement, the Plaintiff informed the agent that due to pending litigation Attorney Gregory had a conflict of interest in the matter.
43. The tenant failed to act on her option and interfered with the Plaintiff's ability to market and show the property, among other damages.
44. The Plaintiff's client involved in the Carriage Trail transaction submitted an affidavit confirming that the Defendants' conduct interfered with the transaction and caused disruption to the sale process. A true and accurate copy of that Affidavit Regarding Carriage Trail Transaction and email correspondence with the Plaintiff, as initiated by the Tenant, initially represented by Yona Gregory, is attached hereto as **Exhibit C**.
45. A second incident of interference, following the Carriage Trail interference, occurred involving property located at 1909 Center Groton Road in Ledyard, Connecticut.
46. During that transaction the same agent discouraged a prospective purchaser from buying the property, criticizing the Plaintiff's Broker Price Opinion, knowledge of the market, and the property itself.

- 47. The property later sold for its full asking price.
 - 48. The conduct described above interfered with the Plaintiff's professional work and real estate brokerage activities.
 - 49. As a result of this interference the Plaintiff lost business opportunities.
 - 50. The conduct described above damaged the Plaintiff's professional reputation within the local real estate community.
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VII. PROFESSIONAL AND ECONOMIC HARM

- 51. The Gregory litigation became widely known within the local legal and real estate communities, and the allegations contained in the lawsuit were discussed among attorneys, agents, and other professionals, thereby damaging the Plaintiff's reputation.
- 52. The Plaintiff had been preparing to open a brokerage office in Stonington but abandoned those plans due to the deleterious effects of the litigation.
- 53. All of the Plaintiff's business operations were significantly disrupted, which substantially reduced her ability to earn a living.
- 54. The conduct described herein did not occur as an isolated dispute but as part of a sustained pattern of actions directed toward the Plaintiff.
- 55. The conduct included the misuse of litigation and interference with the Plaintiff's real estate business activities.
- 56. The conduct also included harassment directed toward the Plaintiff during the pendency of the litigation.

57. At the time these events occurred the Plaintiff was suffering serious and then-undiagnosed medical conditions. The Gregory litigation delayed her from receiving health care and benefits.
58. The Plaintiff notified Attorney Lloyd L. Langhammer that she was experiencing a medical emergency requiring surgery and requested additional time to submit exhibits and materials to the Court.
59. Attorney Langhammer refused to consent to any extension of time. A true and accurate copy of this correspondence is attached hereto as **Exhibit F**. This refusal occurred while the Plaintiff was experiencing serious medical complications and while the harassment described in Section V of this Complaint was ongoing.
60. In reference to the harassment directed towards the Plaintiff, Attorney Langhammer stated that he would inform federal authorities “who is doing this”. A true and accurate copy of this correspondence is attached hereto as **Exhibit F**.
61. As a result of the Defendants’ conduct the Plaintiff could no longer continue her professional work.
62. The Plaintiff suffered emotional distress and financial harm.
63. The conduct described herein caused substantial economic damage to the Plaintiff’s business and livelihood.
64. The Defendants’ conduct described herein was not limited to legitimate advocacy within the judicial process but included actions outside the courtroom designed to harm the Plaintiff’s business, reputation, and livelihood.
65. The Plaintiff brings this action to recover damages caused by the Defendants’ deliberate misuse of litigation and interference with her business.

COUNT ONE

VEXATIOUS LITIGATION

66. The Plaintiff incorporates paragraphs 1-65.
67. On March 21, 2023, the Superior Court (Goodrow, J.) issued a Memorandum of Decision dismissing the claims asserted against the Plaintiff after determining that the statements at issue constituted protected opinion and were not actionable as defamation.
68. The Court's determination that the statements at issue were protected opinion and not actionable as defamation demonstrates that the underlying claims lacked probable cause.
69. The Court's ruling that the statements constituted protected opinion confirms that the underlying defamation claims lacked a factual or legal basis.
70. In its Memorandum of Decision, the Court concluded that the statements at issue were expressions of opinion that could not reasonably be interpreted as asserting verifiable facts and therefore could not support a claim for defamation. See **Exhibit A**.
71. Despite the lack of probable cause and the pendency of the Plaintiff's Special Motions to Dismiss, the Defendants continued to pursue the litigation for an extended period of time, prolonging the proceedings and increasing the financial and professional harm suffered by the Plaintiff.
72. The dismissal of the underlying claims constituted a termination of the action in favor of the Plaintiff within the meaning of Connecticut vexatious litigation law.
73. The Defendants knew their claims lacked merit, yet initiated and continued the litigation with great disregard to the constitutions in order to relentlessly violate the Plaintiff.

74. Despite this knowledge, the Defendants continued to misuse the court for litigation solely to harass the Plaintiff, damage her professional reputation, and impose financial and emotional hardship.

75. As a result, the Plaintiff suffered substantial financial, professional, and personal harm.

76. The Defendants acted with malice in initiating and maintaining the litigation.

COUNT TWO

TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS AND EXPECTANCY

77. The Plaintiff incorporates paragraphs 1-76.

78. The Plaintiff had existing business relationships in the real estate marketplace within Southeastern Connecticut.

79. The Defendants knew or reasonably should have known of these business relationships.

80. The Defendants intentionally interfered with the Plaintiff's business relationships through improper means including harassment, disparagement, and the misuse of litigation.

81. The Defendants' conduct disrupted real estate transactions in which the Plaintiff was professionally engaged.

82. As a result of this interference, the Plaintiff lost business opportunities, income, and professional relationships.

83. The Plaintiff had reasonable expectations of continuing business relationships with clients and prospective clients.

84. The Defendants knew or should have known of these business expectancies.
85. The Defendants intentionally interfered with these relationships through improper conduct including harassment, disparagement, and interference with real estate transactions.
86. As a direct result of the Defendants' actions, the Plaintiff suffered financial loss and damage to her professional reputation.
87. The Plaintiff lost business opportunities.
88. The Defendants are liable for tortious interference with business relations and expectancies.
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COUNT THREE

ABUSE OF PROCESS

89. The Plaintiff incorporates paragraphs 1-88.
90. The Defendants continued to pursue and maintain the litigation while the Plaintiff's Special Motions to Dismiss remained pending for an extended period of time, thereby prolonging the burdens of the litigation despite the statutory purpose of §52-196a to provide prompt resolution of claims targeting protected speech.
91. The Defendants used legal process not for the legitimate purpose of resolving a legal dispute but for the improper purpose of harming the Plaintiff's professional reputation and interfering with her business.
92. The Defendants' use of the litigation process was not limited to pursuing adjudication of a legitimate dispute. Instead, the litigation was used as a means to pressure, intimidate,

and damage the Plaintiff within her professional community while interfering with her real estate business and professional relationships.

93. The Defendants' misuse of legal process caused the Plaintiff substantial harm.

COUNT FOUR

CUTPA (CONNECTICUT UNFAIR TRADE PRACTICES ACT)

94. The Plaintiff incorporates paragraphs 1-93.

95. The conduct of the Defendants occurred in the course of trade or commerce and extended beyond the provision of legal services to include interference with real estate transactions and marketplace competition.

96. The Defendants, acting as attorneys and participants in the real estate marketplace, engaged in unfair methods of competition and unfair or deceptive acts or practices.

97. The Defendants knowingly misused litigation and interfered with the Plaintiff's real estate transactions and professional relationships. "This conduct was immoral, unethical, oppressive, unscrupulous, and fraudulent, and fraud vitiates everything. (*United States v. Throckmorton*, 93 U.S. 61, 25 L.Ed.93, 1878)."

98. The conduct caused substantial injury to the Plaintiff's business and livelihood.

COUNT FIVE

CIVIL CONSPIRACY

99. The Plaintiff incorporates paragraphs 1-98.

- 100.** The Defendants combined to accomplish unlawful objectives. At all relevant times the Defendants Yona Gregory and Lloyd L. Langhammer maintained a close professional relationship within the New London legal community and operated within the same professional and geographic marketplace.
- 101.** Upon information and belief, the Defendants communicated and coordinated with one another regarding the litigation and conduct described in this Complaint.
- 102.** The Defendants committed overt acts in furtherance of this agreement including initiating and maintaining litigation lacking probable cause and interfering with the Plaintiff's real estate transactions.
- 103.** The acts of each Defendant were undertaken in furtherance of the common plan to harm the Plaintiff.
- 104.** The Defendants coordinated litigation strategy and actions directed toward the Plaintiff through their professional relationship and proximity of their offices, and acted in concert to continue litigation lacking probable cause while engaging in conduct designed to damage the Plaintiff's professional reputation.
- 105.** As a direct and proximate result of the Defendants' coordinated actions, the Plaintiff suffered substantial damages including economic loss, reputational harm, and emotional distress.
- 106.** The Defendants are liable for civil conspiracy.
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DEMAND FOR RELIEF

WHEREFORE the Plaintiff claims the following:

1. Compensatory damages;
 2. Punitive damages;
 3. CUTPA statutory damages;
 4. Attorney's fees;
 5. Costs;
 6. Pre-judgment interest;
 7. Post-judgment interest;
 8. Double or treble damages pursuant to CGS §52-568;
 9. Consequential damages resulting from the destruction of the Plaintiff's business and professional reputation;
 10. Such other relief as the Court deems proper.
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THE PLAINTIFF

/s/ Lori Hopkins-Cavanagh

Lori Hopkins-Cavanagh

1 Pine Woods Road

North Stonington, CT 06359

860-449-2007

Self-Represented Plaintiff

EXHIBITS

Exhibit A – Memorandum of Decision (March 21, 2023)

Exhibit B – Affidavit of Timothy Cavanagh

Exhibit C – Affidavit Regarding Carriage Trail Transaction

Exhibit D – Harassment Mailings (multiple documents)

Exhibit E – Objection to Attorney Young Withdrawal

Exhibit F – Langhammer Email (Feb 9, 2023)

Exhibit G – Langhammer Motion Abuse of Process (April 4, 2023)

Exhibit H – Motion to Dismiss Exigent Circumstances (Dec 28, 2022)

CERTIFICATION

I hereby certify that a copy of the foregoing Complaint will be served upon the Defendants by proper officer in accordance with Connecticut law:

Yona Gregory and the Law Offices of Yona Gregory, LLC
16 Granite Street, New London, CT 06320

Lloyd L. Langhammer and the Law Offices of Lloyd L. Langhammer, LLC
18A Granite Street, New London, CT 06320

/s/ Lori Hopkins-Cavanagh

Lori Hopkins-Cavanagh

Date: 03/11/2026