

EXHIBIT A

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SUPERIOR COURT

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SOMERSET COUNTY
CLERK OF SUPERIOR COURT

CHO LAW OFFICES LLC
3490 US ROUTE 1, STE 7B
PRINCETON, NEW JERSEY 08540
(609) 642-4488
ATTORNEYS FOR PLAINTIFFS

PATRICIA ROCCISANO and KRISTI KIZMANN, <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">-vs-</p> TOWNSHIP OF FRANKLIN, TOWNSHIP OF FRANKLIN POLICE DEPARTMENT, ROBERT NEMES, ELLIOT SMITH, and JOHN DOES 1-10 (names being fictitious). <p style="text-align: center;">Defendants.</p>	: SUPERIOR COURT OF NEW JERSEY : LAW DIVISION : SOMERSET COUNTY : Docket No. <u>L 1597-11</u> : : Civil Action : : COMPLAINT AND JURY DEMAND : : : : :
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Plaintiff Patricia Roccisano and Plaintiff Kristi Kizmann, by way of Complaint against Defendants say:

PARTIES

1. Plaintiff Patricia Roccisano ("Patricia") is a resident of Somerset County, New Jersey. Her address is 25 Peoples Line Road, Somerset, New Jersey 08873.
2. Plaintiff Kristi Kizmann ("Kristi") is a resident of Somerset County, New Jersey. Her address is 25 Peoples Line Road, Somerset, New Jersey 08873.
3. Patricia is the mother of Kristi.
4. Defendant Township of Franklin ("Defendant Township"), having an address of Franklin Township Municipal Building, 475 DeMott Lane, Somerset, New Jersey, 08873, is a municipal corporation within the State of New Jersey

5. At all times material hitherto, Defendant Township, was the employer of Defendant Township of Franklin Police Officers in its law enforcement department and was responsible hitherto for the overall investigation, selection, hiring, training, retention and was ultimately responsible for departmental accountability of all members of its police force.
6. Upon information and belief, Defendant Township developed, tested and thereafter instituted procedures, policies, practices and customs which tacitly endorsed the officers' illegal conduct which included, *inter alia*, use of unwarranted and/or excessive force.
7. Defendant Township of Franklin Police Department ("Defendant Police Department"), located at Public Safety Building, 495 Demott Lane, Somerset, New Jersey 08873, is, on information and belief, either a governmental entity and/or public entity and/or instrumentality of the State of New Jersey which employs the police officers who carry out the police duties within the State of New Jersey
8. Defendant Police Department is the entity which is responsible for providing police protection to the occupants, inhabitants, and all other individuals within the boundaries of the State of New Jersey, and performs all activities and services commonly provided by a police department.
9. At all times material hereto, Defendant Police Department was the employer of the Defendant Township of Franklin Police Officers involved in an incident involving Patricia and Kristi on October 17, 2009, which is more fully described hereinafter.
10. Defendant Police Department was responsible for the selection, training, equipping, assigning and supervision of said Defendant Township of Franklin Police Officers.

11. Defendant Township of Franklin Police Officer Robert J. Nemes ("Defendant Nemes"), is being sued in his individual capacity and as an agent, servant, and/or employee of the Township of Franklin Police Department.

12. At all times material hereto, Defendant Nemes was a Township of Franklin Police Officer, then and there acting in his personal capacity and in his official capacity, was involved in the use of unwarranted and/or excessive force against Patricia, in violation of her constitutional, civil, statutory, and regulatory rights, and at all times hereunder acted under color of state law.

13. Defendant Township of Franklin Police Officer Elliot Smith ("Defendant Smith"), is being sued in his individual capacity and as an agent, servant, and/or employee of the Township of Franklin City Police Department.

14. At all times material hereto, Defendant Smith was a Township of Franklin Police Officer, then and there acting in his personal capacity and in his official capacity, was involved in the use of unwarranted and/or excessive force against the Plaintiff, in violation of her constitutional civil, statutory, and regulatory rights, and at all times hereunder acted under color of state law.

15. Defendants John Does 1-10 represent individuals and/or entities whose identities are presently unknown, but who were either involved in the retention, training, supervision and/or employment of Defendant Police Officers, or were other Police Officers of Defendant Franklin Police Department involved in the incident, and related actions thereafter, with Patricia and Kristi.

FACTUAL ALLEGATIONS

16. On October 17, 2009, Kristi was an adult and living with Patricia in Patricia's house located in Somerset, New Jersey.

17. On October 17, 2009, Kristi called Defendant Police Department to seek assistance in entering Patricia's house and retrieving Kristi's belongings because Patricia did not allow Kristi to re-enter the house.

18. Defendant Police Department dispatched Defendant Nemes and Defendant Smith to Patricia's home.

19. When Defendant Nemes and Defendant Smith arrived at Patricia's home, Kristi explained that she merely wanted to enter Patricia's house to retrieve her belongings.

20. Defendant Nemes and Defendant Smith went to the front door of Patricia's house and demanded Patricia to open her door.

21. Patricia opened the door, and, without justification, Defendant Nemes engaged in acts of intimidation such as screaming against Patricia.

22. Patricia became very frightened by the overly aggressive, intimidating and menacing behavior of Defendant Nemes.

23. Patricia informed Defendant Nemes that she would record the screaming by Defendant Nemes with her phone, and she proceeded to record.

24. Patricia responded calmly while Defendant Nemes continued his acts of aggression and intimidation without justification.

25. Due to extreme fright, Patricia informed Defendant Nemes and Defendant Smith that she would be calling Defendant Police Department to request additional police officers.

26. Upon being notified of Patricia's intent to call Defendant Police Department, Defendant Nemes charged through the door, causing damage to Patricia's home.

27. Defendant Nemes used unwarranted and excessive force by grabbing and twisting Patricia's arm, slamming Patricia against a wall, inflicting serious and permanent injuries to Patricia.

28. Defendant Nemes handcuffed Patricia, then swiped Patricia's phone from her hand, then Defendant Nemes deleted the recording contained in Patricia's phone.

29. Defendant Nemes dragged Patricia to the patrol car and forced her sit in the patrol car for a period of time and without justification.

30. Defendant Nemes and Defendant Smith took Patricia to the police station and processed her arrest.

31. At all relevant times, Defendant Smith was with Defendant Nemes and never tried to stop Defendant Nemes from acts of intimidation or unwarranted and excessive force.

32. At all relevant times, Kristi was at Patricia's house, was near the entrance of the Patricia's front door.

33. Patricia suffered serious and permanent injuries as a result of Defendant Nemes' unwarranted and excessive force, and as a result of Defendant Smith's consent of Defendant Nemes' conduct.

34. Patricia has a substantial loss of bodily function as a result of Defendant Nemes' unwarranted and excessive force, and as a result of Defendant Smith's consent of Defendant Nemes' conduct.

FIRST COUNT

(Unreasonable Seizure/Deprivation of Liberty)

35. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.
36. Defendant Nemes and Defendant Smith's detention of Patricia was a seizure within the meaning of the Fourth and Fourteenth Amendments to the United States Constitution and in violation of 42 U.S.C. §1983.
37. Defendant Nemes and Defendant Smith did not have reasonable cause to seize Plaintiff.
38. Defendant Nemes and Defendant Smith's involuntary detention of Plaintiff was without reasonable cause, which was the proximate cause of damages suffered by Plaintiff.
39. Defendant Nemes and Defendant Smith acted in reckless disregard of Plaintiff's Fourth and Fourteenth Amendment rights.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

SECOND COUNT

(Excessive Force)

40. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

41. Defendant Nemes, with the consent and approval of Defendant Smith, utilized unwarranted and excessive force against Patricia, in violation of her Fourth Amendment right to be secure against unreasonable seizures and in violation of 42 U.S.C. 1983.

42. Defendant Nemes and Defendant Smith failed to utilize proper procedures and techniques regarding law enforcement interactions with citizens, and/or violated procedures and policies of the Defendant Township and/or Defendant Police Department with regard to same.

43. Defendant Township acted in reckless disregard of Plaintiff Patricia's Fourth Amendment rights.

44. Defendant Nemes', with the consent and approval of Defendant Smith, use of excessive force was the proximate cause of damages suffered by Plaintiff Patricia.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and

G. Such other and further relief as this Court may deem just and equitable.

THIRD COUNT

(False Arrest/False Imprisonment)

45. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

46. Defendant Nemes and Defendant Smith's arrest and/or detention of Plaintiff Patricia was against the Plaintiff Patricia's will, and was done without proper legal authority or legal justification in violation of 42 U.S.C. 1983 and New Jersey Statute(s).

47. Defendant Nemes and Defendant Smith lacked probable cause to detain/arrest Plaintiff Patricia.

48. Plaintiff suffered damages as a result of Defendant Nemes and Defendant Smith's actions.

49. Defendant Nemes and Defendant Smith acted in reckless disregard to Plaintiff's Fourth Amendment rights.

50. Defendant Nemes and Defendant Smith's conduct was the proximate cause of damages suffered by Plaintiff Patricia.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;

E. Actual damages;

F. Attorneys' fees and costs of suit; and

G. Such other and further relief as this Court may deem just and equitable.

FOURTH COUNT

(Intentional Infliction of Emotional Distress)

51. Plaintiff repeats and makes a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

52. Defendant Nemes and Defendant Smith's conduct was extreme and outrageous, was intended to produce emotional distress, and/or was in reckless disregard of a high probability that emotional distress would follow.

53. Plaintiff suffered extreme emotional distress and damages which were proximately caused by Defendant Nemes and Defendant Smith's conduct.

WHEREFORE, Plaintiff Patricia Roccisano and Plaintiff Kristi Kizmann demands judgment in their favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

A. Compensatory damages;

B. Consequential damages;

C. Punitive damages;

D. Statutory damages;

E. Actual damages;

F. Attorneys' fees and costs of suit; and

G. Such other and further relief as this Court may deem just and equitable.

FIFTH COUNT

(Negligent Infliction of Emotional Distress)

54. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

55. Defendant Nemes and Defendant Smith was negligent with regard to his aforementioned conduct, which caused Plaintiff Patricia personal injury and/or fear of immediate personal injury.

56. Plaintiffs suffered extreme emotional distress, which was proximately caused by Defendant Nemes and Defendant Smith's conduct.

WHEREFORE, Plaintiff Patricia Roccisano and Plaintiff Kristi Kizmann demands judgment in their favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

A. Compensatory damages;

B. Consequential damages;

C. Punitive damages;

D. Statutory damages;

E. Actual damages;

F. Attorneys' fees and costs of suit; and

G. Such other and further relief as this Court may deem just and equitable.

SIXTH COUNT

(Negligence/Gross Negligence)

57. Plaintiff repeats and makes a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

58. Defendant Nemes and Defendant Smith's conduct constitutes negligence and/or gross negligence.

59. Plaintiff has suffered damages, which was proximately caused by the negligence and/or gross negligence of Defendant Nemes and Defendant Smith.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

SEVENTH COUNT

(Malicious Prosecution)

60. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

61. Subsequent to the aforementioned incident, Defendant Nemes and Defendant Smith prepared an Incident Report, in which they set forth numerous misrepresentations and untruths with regard to his interaction with Plaintiff Patricia.

62. Defendant Nemes and Defendant Smith issued Plaintiff Patricia a ticket/summon.

63. The aforementioned disorderly persons matter instituted against Plaintiff Patricia was actuated by malice and without probable cause.

64. Plaintiff Patricia suffered damages as a proximate cause of the malicious prosecution set forth above.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

EIGHTH COUNT

(Abuse of Process)

65. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

66. With regard to the arrest and prosecution of Plaintiff Patricia, Defendant Nemes and Defendant Smith had an ulterior motive for pursuing the offense, which was to harass and intimidate Plaintiff Patricia.

67. The actions of the Defendant Nemes and Defendant Smith as aforesaid constitute a "further act" after the issuance of process and represent a perversion of the legitimate use of process.

68. Plaintiff has suffered damages as a proximate cause as a result of the aforementioned actions.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

TENTH COUNT

(Negligent Supervision, Inadequate Training and Negligent Hiring)

69. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

70. Defendants Township and/or Defendant Police Department failed to provide adequate training to Defendant Nemes and Defendant Smith, which proximately caused the damages sustained by Plaintiffs.
71. The constitutional and/or other violations of Defendant Nemes and Defendant Smith resulted from a custom, policy, and/or practice of the municipality and/or policymaker, which indirectly caused the misconduct of Defendant Nemes and Defendant Smith.
72. Upon information and belief, Defendant Township and/or Defendant Police Department had knowledge of and/or was otherwise alerted to the possible use of excessive force by its police officers, but acquiesced and/or exhibited deliberate indifference, by failing to take proper corrective disciplinary actions and/or training sessions to abate the aforementioned problems.
73. Upon information and belief, Defendant Township and Defendant Police Department were negligent in hiring Defendant Nemes and Defendant Smith, failed to adequately supervise and train Defendant Nemes and Defendant Smith and/or negligently retained Defendant Nemes and Defendant Smith as a Special Police Officer.
74. Upon information and belief, Defendant Township and/or Defendant Police Department failed to take proper corrective disciplinary supervisor and/or training measures to abate the aforementioned problems.
75. Defendants acted in reckless disregard of Plaintiff's Fourth Amendment rights.
76. Plaintiffs have suffered damages as a proximate cause of the actions and omissions of the Defendants.

WHEREFORE, Plaintiff Patricia Roccisano and Plaintiff Kristi Kizmann demands judgment in their favor and against the Defendants, Township of Franklin, Township of Franklin

Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

ELEVENTH COUNT

(Equal Protection)

77. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

78. Pursuant to the equal protection clause of the Fifth and Fourteenth Amendments of the Constitution of the United States, Plaintiff Patricia is guaranteed equal protection under law.

79. One of the purposes of said equal protection clause is to secure every person within the State's jurisdiction against intentional and arbitrary discrimination, whether occasioned by the expressed terms of a statute, ordinance or other law, or by improper execution through duly constituted agents.

80. While at all times acting under the authority and color of law, the Defendants' actions and course of conduct have intentionally and arbitrarily discriminated against the Plaintiff, without any rational basis.

81. Plaintiff has been denied and deprived of his equal protection rights under the law by the Defendants, in violation of the Fifth and Fourteenth Amendments of the Constitution of the United States.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in their favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

FOURTEENTH COUNT

(New Jersey Civil Rights Violation of N.J.S.A.: 10:6-2, *et seq.*)

82. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

83. Defendant Nemes and Defendant Smith, while acting under color of law, subjected Plaintiff to the deprivation of substantive due process and/or equal protection rights, privileges and/or immunities secured by the Constitution or laws of the United States and/or the State of New Jersey.

84. Plaintiffs have suffered damages as a result of the actions of the Defendants.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

FIFTEENTH COUNT

(Tort Claims Act: Violation of N.J.S.A. 59:1-1 et seq.)

85. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

86. The actions and omissions of the Defendants constitute negligence, and/or otherwise constitute a violation of N.J.S.A. 59:1-1 et seq.

87. Plaintiff Patricia has suffered damages as a direct and proximate result of the actions and omissions of Defendants as set forth herein.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in her favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;
- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

SEVENTEENTH COUNT

(Civil Conspiracy)

88. Plaintiffs repeat and make a part hereof all of the allegations contained in all previous paragraphs of this Complaint as if same were more fully set forth at length herein.

89. Defendant Nemes and Defendant Smith have conspired to improperly and illegally deprive Plaintiff Patricia of her constitutional rights and protections, by virtue of the use of unwarranted and excessive force, arrest and prosecution of Plaintiff Patricia.


90. Plaintiff Patricia has suffered damages, which were proximately caused by the actions of the Defendants.

WHEREFORE, Plaintiff Patricia Roccisano demands judgment in their favor and against the Defendants, Township of Franklin, Township of Franklin Police Department, Defendant Nemes, Defendant Smith and Defendant John Does 1-10 (names being fictitious), as follows:

- A. Compensatory damages;
- B. Consequential damages;

- C. Punitive damages;
- D. Statutory damages;
- E. Actual damages;
- F. Attorneys' fees and costs of suit; and
- G. Such other and further relief as this Court may deem just and equitable.

CHO LAW OFFICES LLC
Attorney for Plaintiffs



Jae H. Cho, Esq.

Dated: October 10, 2011

JURY DEMAND

Plaintiff hereby demands trial by jury of all issues in this action.

CHO LAW OFFICES LLC
Attorney for Plaintiff



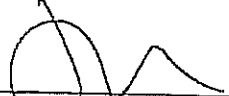
Jae H. Cho

Dated: October 10, 2011

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designate Jae H. Cho, Esq. of Cho Law Offices, LLC as trial counsel.

CHO LAW OFFICES LLC
Attorney for Plaintiff

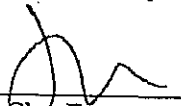


Jae H. Cho, Esq.

Dated: October 10, 2011

CERTIFICATION PURSUANT TO R. 4:5-1


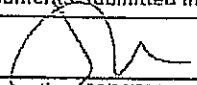
Plaintiffs, by their attorney, hereby certify that the matter in controversy is not the subject of any other pending or contemplated judicial or arbitration proceeding. Plaintiffs are not currently aware of any other parties that should be joined in this action.



Jae H. Cho, Esq.

Dated: October 10, 2011

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed.		FOR USE BY CLERKS OFFICES ONLY PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO.: AMOUNT: OVERPAYMENT: BATCH NUMBER:
	1. ATTORNEY/PRO SE NAME <i>Jaee H. Cho</i>	2. TELEPHONE NUMBER <i>609 642 4668</i>	3. COUNTY OF VENUE <i>Somerset</i>
	4. FIRM NAME (if applicable) <i>Cho Law Offices LLC</i>		5. DOCKET NUMBER (when available)
	6. OFFICE ADDRESS <i>3490 US Route 1, Ste 7B Princeton, NJ 08540</i>		7. DOCUMENT TYPE <i>Complaint</i>
9. NAME OF PARTY (e.g., John Doe, Plaintiff) <i>Patricia Roccasano and Kristi Kizmann, Plaintiffs</i>		10. CAPTION <i>Patricia Roccasano and Kristi Kizmann, Plaintiffs v. Township of Franklin, Township of Franklin Police Dept., Robert Nemes, Elliot Smith and John Doe 1-10.</i>	
11. CASE TYPE NUMBER (See reverse side for listing) <i>005, 099</i>	12. IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
13. RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	14. IF YES, LIST DOCKET NUMBERS		
15. DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	16. NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input checked="" type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
17. DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
18. DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
19. USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
20. DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
21. WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?	
22. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
23. ATTORNEY SIGNATURE: 			

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Centrally Managed Litigation (Track IV)

- | | |
|---|--|
| <ul style="list-style-type: none"> 280 ZELNORM 285 STRYKER TRIDENT HIP IMPLANTS 288 PRUDENTIAL TORT LITIGATION 289 REGLAN | <ul style="list-style-type: none"> 290 POMPTON LAKES ENVIRONMENTAL LITIGATION 291 PELVIC MESH/GYNECARE 292 PELVIC MESH/BARD 293 DEPUY ASR HIP IMPLANT LITIGATION |
|---|--|

Mass Tort (Track IV)

- | | |
|---|--|
| <ul style="list-style-type: none"> 248 CIBA GEIGY 266 HORMONE REPLACEMENT THERAPY (HRT) 271 ACCUTANE/SOTRETINOIN 274 RISPERDAL/SEROQUEL/ZYPREXA 278 ZOMETHA/AREXIA 279 GADOLINIUM | <ul style="list-style-type: none"> 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL 282 FOSAMAX 284 NUVARING 286 LEVAQUIN 287 YAZ/YASMIN/OCELLA 601 ASBESTOS |
|---|--|

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category Putative Class Action Title 59