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RECEIVED / FILED
 Superior Court of New Jersey
SEP 16 2013
 CIVIL CASE MANAGEMENT
 UNION COUNTY

ANDRE CRAWFORD)
 Plaintiff,)
 v.)
 CITY OF PLAINFIELD, CITY OF)
 PLAINFIELD POLICE)
 DEPARTMENT, JEFFREY PLUM)
 Defendants)

Superior Court of New Jersey
 Law Division
 Union County
 Docket No:

UNN-L-3184-13

COMPLAINT

ANDRE CRAWFORD residing at 1141 Thonton Ave, Plainfield, New Jersey complains of the Defendants and says:

COUNT ONE

1. At all relevant times hereto, Plaintiff was employed by Defendant City of Plainfield, Police Department as a patrolman.
2. At all relevant times hereto, Plaintiff was President of the local police union.
3. At all relevant times hereto, Jeffrey Plum ("Plum") was employed by the Defendant, City of Plainfield Police Department and held the rank of Lieutenant.
4. On February 19, 2013 Plaintiff observed Plum who was off duty, kissing and otherwise acting unprofessionally and inappropriately with a subordinate, Melissa Howell.
5. Plaintiff complained to Plum that the latter's behavior was unprofessional and inappropriate.
6. Plaintiff also wrote Plum up for the incident.
7. Plaintiff observed Plum engaging in what Plaintiff reasonably believed was sexual harassment in violation of the New Jersey Law Against Discrimination ("NJLAD") N.J.S.A. 10:5-1 et seq

8. Plaintiff complained about what he believed was a sexual relationship between Plum and Howell and Plum's inappropriate behavior.

8. Plaintiff's reporting/complaining of Plum's inappropriate sexual harassment aforesaid was a protected activity under the NJLAD.

9. As a result of Plaintiff's reporting Plum's inappropriate sexual harassment aforesaid, Plaintiff was retaliated against in violation of the NJLAD.

10. Said retaliation includes but is not limited to, Plum filing a hostile workplace complaint against Plaintiff and Plaintiff being transferred from Uniform Bureau Platoon 2A to 1A.

11. Plaintiff suffered injury as a result of the aforesaid retaliation including but not limited to emotional distress, a significant reduction in overtime, an unwanted change in schedule requiring him to work certain holidays that he would have had off but for the transfer, being the subject of ridicule by fellow officers and suffering embarrassment before the community.

WHEREFORE: Plaintiff demands judgment against defendants for compensatory damages, attorney's fee pursuant to statute, costs of suit and any other relief that this Court deems just.

COUNT TWO

12. Plaintiff repeats and re-alleges each of the allegations contained in paragraphs 1-11 as if each was alleged herein at length.

13. Defendants, through their actions created a hostile work environment in violation of the NJLAD.

14. Defendant permitted a hostile work environment to exist which existed due to Plaintiff's inclusion in the protected class.

15. Defendants have violated N.J.S.A. 10:5-1 et seq.

16. As a result of Defendants' violations of N.J.S.A. 10:5-1, Plaintiff suffered damages and injury including but not limited to severe emotional distress.

WHEREFORE: Plaintiff demands judgment against defendants for compensatory damages, attorney's fee pursuant to statute, costs of suit and any other relief that this Court deems just.

COUNT THREE

17. Plaintiff repeats and re-alleges each of the allegations contained in paragraphs 1-16 as if each was alleged herein at length

18. Plaintiff repeats and re-alleges each of the allegations contained in paragraphs 1-10 contained Count Three as if each was alleged herein at length.

19. The actions of Defendant were willful and wonton.

WHEREFORE: Plaintiff demands judgment against Defendants for punitive damages.

NOTICE PURSUANT TO RULES 1:5-1(a) & 4:17-4(c)

TAKE NOTICE that the undersigned attorneys, counsel for this Plaintiff, do hereby demand, pursuant to Rules 1:5-1(a) and 4:17-4(c) that each party herein serving pleadings and interrogatories and receiving answers thereto serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers and other material referred to therein, upon the undersigned attorney and TAKE NOTICE that this is a continuing demand.

DEMAND FOR TRIAL BY JURY

The Plaintiff hereby demands a trial by a jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to R. 4:25-4, Lawrence N. Lavigne, Esq. is hereby designated as trial counsel in the within captioned matter.

CERTIFICATION

I hereby certify pursuant to R. 4:5-1 that, to my present knowledge, the matter in controversy is the not the subject of any other action. I further certify that, to my present knowledge, no other party should be joined in the within action at this time, however, we is still reviewing this matter to determine if additional parties should be joined. This is to further certify that the within pleading has been served within the time provided by the Rules governing the Courts of the State of New Jersey.

CERTIFICATION OF OTHER MATTERS

None.

LAWRENCE N. LAVIGNE, ESQ. L.L.C.
Attorneys for Plaintiff

By:


LAWRENCE N. LAVIGNE

Dated: September 13, 2013

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 CLERK'S OFFICE ONLY

PAYMENT TYPE:	<input type="checkbox"/> CK	<input type="checkbox"/> CG	<input type="checkbox"/> CA
CHG/CK NO.			
AMOUNT:			
OVERPAYMENT:			
BATCH NUMBER:			

ATTORNEY / PRO SE NAME Lawrence N. Lavigne		TELEPHONE NUMBER (908) 687-7750	COUNTY OF VENUE Union
FIRM NAME (if applicable) Lawrence N. Lavigne, Esq. LLC		DOCUMENT NUMBER (when available) UNPL-3184-13	
OFFICE ADDRESS 2204 Morris Ave, Ste L-1 Union, New Jersey 07083		DOCUMENT TYPE Complaint	JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NAME OF PARTY (e.g., John Doe, Plaintiff) Andre Crawford, Plaintiff		CAPTION Andre Crawford v City of Plainfield, et als	
CASE TYPE NUMBER (See reverse side for listing) 618	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	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:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.	
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" 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			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input checked="" type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> Yes <input type="checkbox"/> No			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
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	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?	

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)*.

ATTORNEY SIGNATURE:



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

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 288 PRUDENTIAL TORT LITIGATION |
| 271 ACCUTANE/ISOTRETINOIN | 289 REGLAN |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 278 ZOMETA/AREXIA | 291 PELVIC MESH/GYNECARE |
| 279 GADOLINIUM | 292 PELVIC MESH/BARD |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 282 FOSAMAX | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 284 NUVARING | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 601 ASBESTOS |
| 287 YAZ/YASMIN/OCELLA | 623 PROPECIA |

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

UNION COUNTY SUPERIOR COURT
2 BROAD STREET
ELIZABETH NJ 07207

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (908) 659-4817
COURT HOURS

DATE: SEPTEMBER 17, 2013
RE: CRAWFORD VS CITY OF PLAINFIELD
DOCKET: UNN L -003184 13

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JOSEPH P. PERFILIO

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (908) 659-4820.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: LAWRENCE N. LAVIGNE
LAWRENCE N. LAVIGNE
2204 MORRIS AVE STE L1
UNION NJ 07083-5918

JUVBREN