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RECEIVED / FILED
Superior Court of New Jersey
JUL 16 2014
CIVIL CASE MANAGEMENT
UNION COUNTY

JEFFREY PLUM, : SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION-UNION COUNTY
: :
Plaintiff, : Docket No.
: :
vs., : UNN-L-2529-14
: CIVIL ACTION
: :
ANDRE CRAWFORD, CITY OF PLAINFIELD, : COMPLAINT, JURY DEMAND AND
and PLAINFIELD POLICE DEPARTMENT, : DESIGNATION OF TRIAL COUNSEL
: :
: :
: :

FIRST COUNT
(Assault, Battery and False Imprisonment)

Plaintiff, Jeffrey Plum, presently residing at 735 Pemberton Avenue,
Plainfield, New Jersey, by way of Complaint, says:

1. At all times relevant to this matter, Defendant, Andre Crawford ("Crawford") was and remains employed by the City of Plainfield as a police officer and is also the president of the local police union.
2. At all times relevant to this matter, the Plaintiff was and remains employed by the City of Plainfield as a police officer.
3. On or about February 19, 2013, while the Plaintiff was off duty and present in the headquarters of Defendant Plainfield Police Department, Crawford placed his arm around the Plaintiff's neck, pulled him into an office and began yelling at the Plaintiff. The Plaintiff attempted to leave the room but his exit was blocked by the Defendant.

4. As a result of this incident, the Plaintiff suffered and continues to suffer emotional distress, underwent treatment and incurred expenses for the treatment.

WHEREFORE, THE Plaintiff demands judgment against the Defendant, Andre Crawford, for compensatory and punitive damages, interest, attorney's fees and costs of suit.

SECOND COUNT
(Abuse of Process)

1. The Plaintiff repeats and realleges all of the facts of the First Count as if fully set forth herein at length.

2. Subsequent to the Plaintiff reporting the incident to his superiors, in retaliation, Crawford filed a false report to his superiors alleging that the Plaintiff engaged in illegal and/or improper conduct.

3. As a result, the Plaintiff suffered and continues to suffer emotional distress, underwent treatment and incurred expenses for the treatment.

WHEREFORE, THE Plaintiff demands judgment against the Defendant, Andre Crawford, for compensatory and punitive damages, interest, attorney's fees and costs of suit.

THIRD COUNT
(Abuse of Process)

1. The Plaintiff repeats and realleges all of the facts of the First and Second Counts as if fully set forth herein at length.

2. Subsequent to the Plaintiff reporting the incident to his superiors, in retaliation, Crawford filed a lawsuit alleging that the Plaintiff engaged in illegal and/or improper conduct.

3. The law suit filed by Crawford is baseless, contains false allegations and was filed against the Plaintiff for the sole purpose of harassing the Plaintiff and forcing the Plaintiff to respond to the law suit.

WHEREFORE, THE Plaintiff demands judgment against the Defendant, Andre Crawford, for compensatory and punitive damages, interest, attorney's fees and costs of suit.

FOURTH COUNT

1. The Plaintiff repeats and realleges all of the facts of the First, Second, Third and Fourth Counts as if fully set forth herein at length.

2. The Plaintiff holds the rank of Lieutenant and Crawford hold the rank of police officer.

3. On numerous occasions, the Plaintiff has filed reports to his superiors regarding improper conduct of Crawford.

4. The complaint referenced above was investigated by the Plainfield Police Department Internal Affairs Division and was found to have merit.

5. Despite the complaint having merit, no detrimental action was taken against Crawford nor was action taken regarding other complaints.

6. Without proper notice, the Plaintiff was summoned to the office of the Police Director and confronted with Crawford, a witness brought to the meeting by Crawford and the City of Plainfield attorney.

7. The aforementioned act by the City of Plainfield violated the due process rights of the Plaintiff.

8. The actions and inactions by the City of Plainfield and the Plainfield Police Department have caused the Plaintiff to being subjected to ridicule and the Plaintiff suffered and continues to suffer emotional distress, underwent treatment and incurred expenses for the treatment and continues to experience emotional distress and undergo treatment for same

WHEREFORE, the Plaintiff demands judgment against the Defendants, City of Plainfield and Plainfield Police Department together with interest and costs of suit.

JURY DEMAND

Plaintiff demands a trial by jury on all counts

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:5-1 (c), Robert J. Jeney, Jr. is hereby designated as trial counsel on this matter.

DEMAND FOR ANSWERS TO INTERROGATORIES

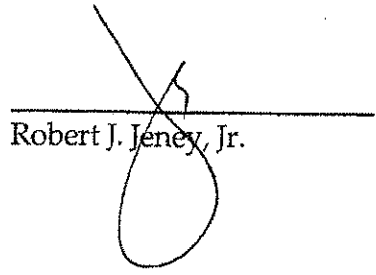
The Plaintiff demands that the Defendants provide a response to Form C Interrogatories as contained in the Appendix to the Rules of Court, within the time specified in Rule 4:17-1, *et seq.*

CERTIFICATION




I certify that this matter is the subject of an action pending in the Superior Court of New Jersey, Law Division, Union County, Andre Crawford v. City of Plainfield, et als. Docket No. UNN-L-3184-13; and that no other parties should be joined in this action.

I certify that confidential 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).

Dated: July 15, 2014


Robert J. Jeney, Jr.

Appendix XII-B1

| | | | |
|---|---|---|---|
|  | <p>CIVIL CASE INFORMATION STATEMENT (CIS)</p> <p>Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed</p> | | <p><small>FOR USE BY CLERK'S OFFICE ONLY</small></p> <p>PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA</p> <p>CHG/CK NO.</p> <p>AMOUNT:</p> <p>OVERPAYMENT:</p> <p>BATCH NUMBER:</p> |
| | ATTORNEY / PRO SE NAME ROBERT J. JENEY, JR. | | TELEPHONE NUMBER (908) 322-9191 |
| | FIRM NAME (if applicable) JENEY, JENEY & O'CONNOR | | COUNTY OF VENUE Union |
| | OFFICE ADDRESS 1953 WESTFIELD AVENUE SCOTCH PLAINS, NEW JERSEY 07076 | | DOCKET NUMBER (when available) UNN-L-2529-14 DOCUMENT TYPE COMPLAINT JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| NAME OF PARTY (e.g., John Doe, Plaintiff) JEFFREY PLUM | | CAPTION JEFFREY PLUM V. ANDRE CRAWFORD, CITY OF PLAINFIELD AND PLAINFIELD POLICE DEPARTMENT | |
| CASE TYPE NUMBER (See reverse side for listing) 005 | 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:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT. | |
| RELATED CASES PENDING? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | IF YES, LIST DOCKET NUMBERS UNN-L-003184-13 | |
| DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input 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 checked="" 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 <i>Rule 1:38-7(b)</i> . | | | |
| ATTORNEY SIGNATURE:  | | | |