

FILED

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CAMDEN COUNTY SUPERIOR COURT

Law Offices of
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Attorney for Plaintiff

BONNIE STANTON, Plaintiff, vs. DEPTFORD TOWNSHIP BOARD OF EDUCATION and JOHN DOES, Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION CAMDEN COUNTY Docket No.: <i>L-1720-11</i> <i>Civil Action</i> COMPLAINT AND DEMAND FOR JURY TRIAL
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Plaintiff, by and through her attorney, Daniel B. Zonies, complains against the defendants as follows:

**COUNT ONE
NEW JERSEY
LAW AGAINST DISCRIMINATION**

1. Plaintiff Bonnie Stanton is an individual whose resides in Cherry Hill, New Jersey.
2. Defendant Deptford Township Board of Education is a public body which administers the public school system in Deptford Township, New Jersey.
3. John Does are unidentified individuals and/or entities who participated in or otherwise bear responsibility for the wrongs alleged herein.
4. Plaintiff was hired by defendant Board of Education in July 2003 as a custodian.

5. During the course of her employment with the Board of Education, plaintiff required two separate knee surgeries, in 2005 and 2008, with concomitant recuperation periods of about 12 weeks months each.
6. Aside from these surgery periods, plaintiff was ready, willing and able to perform her job with the Board of Education.
7. On or about June 20, 2009, the Board of Education terminated plaintiff from her employment because of absences related to her disability.
8. The actions of defendants violate New Jersey's Law Against Discrimination, N.J.S.A. 10:5-3, which prohibits employment discrimination based on race, age and gender.
9. As a direct and proximate cause of defendants' misconduct, plaintiff has suffered damages, including but not limited to, loss of income, humiliation, and loss of dignity.

WHEREFORE, plaintiffs demand judgment against defendants for compensatory damages, including front and back pay, promotion, punitive damages, costs of suit, attorney's fees, and such other relief as N.J.S.A. 10:5-3 allows, and/or as the Court otherwise deems appropriate.

COUNT TWO
FMLA

10. Plaintiff re-alleges each and every allegation set out above.
11. The actions of defendants violated the Family Medical Leave Act, 29 U.S.C.A. 2601 et seq., which prohibits retaliation against an employee for exercising rights under the FMLA.
12. As a direct and proximate cause of defendants' misconduct, plaintiff has suffered

damages, including but not limited to, loss of income, mental and emotional suffering, humiliation, and loss of dignity.

WHEREFORE, plaintiffs demand judgment against defendant for compensatory damages, costs of suit, attorney's fees, punitive damages, and such other relief as 29 U.S.C.A. 2601, et seq., allows, and/or as the Court otherwise deems appropriate.

**COUNT THREE
PUNITIVE DAMAGES**

13. Plaintiff re-alleges each and every allegation set out above.
14. The actions of defendants were outrageous and constitute behavior unacceptable in a civilized society.

WHEREFORE, plaintiffs demand judgment against defendants for punitive damages.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury of six members as to all issues.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that DANIEL B. ZONIES, ESQUIRE, is hereby designated as trial counsel to Rule 4:25-4.

CERTIFICATION PURSUANT TO R.4:5-1

I hereby certify that to the best of my knowledge the matter in controversy is not the subject of any pending arbitration proceeding or the subject of any contemplated arbitration. I further certify that I know of no other party who should be joined in this action.

3/31/11



DANIEL B. ZONIES, ESQUIRE
Attorney for Plaintiff