

MADDEN & MADDEN, P.A.
108 KINGS HIGHWAY EAST - SUITE 200
POST OFFICE BOX 210
HADDONFIELD, NEW JERSEY 08033
TEL: (856) 428-9520
Attorney for Defendants, Manasquan Board of Education and Manasquan High School

ROBERT FERRANTE AND DOREEN
FERRANTE

Plaintiff(s),

v.

COUNTY OF MONMOUTH;
MONMOUTH COUNTY PROSECUTOR'S
OFFICE; MANASQUAN BOARD OF
EDUCTAION; MANASQUAN HIGH
SCHOOL; NEW JERSEY MOTOR
VEHICLE COMMISSION; STATE OF
NEW JERSEY; THE PATCH; RICHARD
ROE PUBLISHER; ABC PUBLISHING
COMPANY; JOHN/JANE DOES (1-100);
XYZ COS. (1-10)

Defendant(s).

**United States District Court
District of New Jersey
Vicinage of Trenton**

**Civil Action No.
3:16-cv-03496-MLC-LHG**

**NOTICE OF MOTION TO DISMISS
IN LIEU OF ANSWER BY
MANASQUAN BOARD OF
EDUCATION AND MANASQUAN
HIGH SCHOOL**

TO: John Jay Perrone, Esq.
464 Broadway Blvd.
Long Branch, New Jersey 07740
Attorney for Plaintiffs Robert Ferrante and Doreen Ferrante

David A. Laughlin, Esq.
Birdsall & Laughlin, LLC
1720 Highway 34 North
P.O. Box 1380
Wall, New Jersey 07719
Attorney for Defendants County of Monmouth and Monmouth County Prosecutors
Office

Ashley Costello
Deputy Attorney General
R.J. Hughes Justice Complex
P.O. Box 116
Trenton, New Jersey 08625

Attorney for Defendants New Jersey Motor Vehicle Commission and State of New Jersey

PLEASE TAKE NOTICE that on Monday, **August 15, 2016**, or as soon thereafter as counsel may be heard, the undersigned, Patrick J. Madden, Esq., on behalf of defendants, Manasquan Board of Education and Manasquan High School, shall move before the Honorable Mary L. Cooper, U.S.D.J. in the United States District Courthouse, Trenton, New Jersey, for an Order dismissing Plaintiffs' claims in Count II against Manasquan Board of Education and Manasquan High School pursuant to Fed.R.Civ.P. 12(b)(6).

Reliance shall be placed upon the enclosed brief and statement of facts with supporting exhibits.

A proposed form of Order is attached.

Oral argument is not requested unless timely opposition is received.

MADDEN & MADDEN, P.A.

/s/ Patrick J. Madden

By:

Patrick J. Madden, Esq.

DATED: July 19, 2016