

RECEIVED APR 30 2015

UNITED STATES DISTRICT COURT
for the
District of New Jersey

ROMONA BERRY

Plaintiff

v.

THE BOROUGH OF LINDENWOLD et al

Defendant

Civil Action No. 14-cv-7343 (RBK-AMD)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)
THE BOROUGH OF LINDENWOLD

A lawsuit has been filed against you.

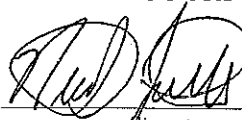
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

ROMONA BERRY
132 MILLER AVE.
CHESILHURST, NJ 08089

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

WILLIAM T. WALSH

CLERK OF COURT



Signature of Clerk or Deputy Clerk

Date: 1/20/2015

AO 240A (Rev. 01/09; NJ 05/13) Order to Proceed Without Prepaying Fees or Costs

UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW JERSEY

RAMONA BERRY
Plaintiff(s),

v.

THE BOROUGH OF LINDENWOLD
Defendant(s).

**ORDER ON APPLICATION
TO PROCEED WITHOUT
PREPAYMENT OF FEES**

Civil Action No 1:14-cv-07343-RBK-AMD

Having considered the application to proceed without prepayment of fees under 28 U.S.C. §1915, IT IS ORDERED the application is:

☒ **GRANTED, and**

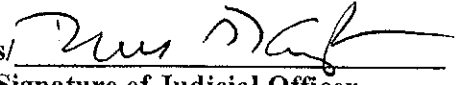
☒ **The clerk is ordered to file the complaint,**

☒ **IT IS FURTHER ORDERED, the clerk issue a summons and the U.S. Marshal serve a copy of the complaint, summons and this order upon the defendant(s) as directed by the plaintiff(s). All costs of service shall be advanced by the United States.**

☐ **DENIED, for the following reasons:**

☐ **IT IS FURTHER ORDERED, the clerk is ordered to close the file. Plaintiff(s) may submit payment in the amount of \$400 within 14 days from the date of this order to reopen the case without further action from the Court.**

ENTERED this 10th day of January, 2014.

s/ 
Signature of Judicial Officer

ROBERT B. KUGLER
Name and Title of Judicial Officer

NOV 25 2014

AT 8:30... M
WILLIAM T. WALSH CLERK

IN THE UNITED STATES DISTRICT COURT CAMDEN VIVINAGE

Romona Berry

Civil Case No. _____

Vs

The Borough of Lindenwold
Officer Williams
Lindenwold Police Department.

Jurisdiction

District Court has jurisdiction in matters regarding Police Officers, municipalities and its official's.

Short *& Plain Statement .

Plaintiff Romona Berry was called to the scene to see about her daughter who was being arrested falsely for a crime she did not commit and the police had drawn their weapons. Once at the scene plaintiff was yelled at, and ordered leave, as plaintiff retreated back to her car she was violently grabbed, by Officer Williams, slammed into the car, handcuffed and arrested. Plaintiffs daughter Iesha Medley who was at the scene screamed for the officer to be gentle with her mother due to her recent back surgery in where she had a spinal fusion done at Cooper University Hospital in Camden. The officer ignored the pleas of Iesha medley in regards to plaintiff delicate medical condition causing re-injury to the neck, spine, right leg and back of plaintiffs body, in violation of 5.1-1 **Use of Excessive Force in Violation of 42 U.S.C. § 1983**

Defendant Officer Williams searched plaintiff while still in her nightclothes for bed, over the request of the plaintiff to have a female officer at the scene making her feel very uncomfortable exposed and publically humiliated, by the officer touching parts of her female anatomy, **in Violation of 42 USC 1983**

Cruel and unusual punishments by (police) are prohibited by the Eighth Amendment to the U.S. Constitution. The Fourteenth Amendment provides further protection to individuals, prohibiting the state from depriving any person of life, liberty, or property, without due process of law. The defendant have a long history of violating the constitutional rights of African Americans and women, customarily.

Demand

\$150'000. Medical bills paid including any rehabilitation needed,

and another other relief the court deems appropriate.

Romona Berry

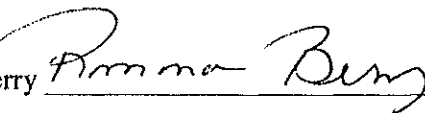
Romona Berry

Date

11-22-14

Certification

I Certify that the statements made are true to the best of my ability and belief and I know that if any of the statements are willfully false that I am subject to fines under law.

Romona Berry 

Date 11-22-14

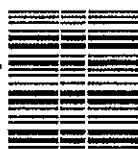
98 Oak Ave
Spindenwood Ave
APT 4308

08021

U.S. District Court
3rd + Market St
Spinden W.S.
Pth: Clerk 08101



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NOV 25 2014
AT 8:30
MAIL ROOM T. W. 4154 C/F 9K

IN THE UNITED STATES DISTRICT COURT CAMDEN VIVINAGE

Romona Berry

Civil Case No.

Vs

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14-7343

The Borough of Lindenwold
Officer Williams
Lindenwold Police Department.

JAN 15 2010
AT 8:30 _____ M
WILLIAM T. WALSH CLERK

Amended Complaint

Jurisdiction

District Court has jurisdiction in matters regarding Police Officers, municipalities and its official's.

Short & Plain Statement .

Plaintiff Romona Berry who practices the Christian religion, was called to the scene to see about her daughter, who was being arrested falsely for a crime she did not commit and the police had drawn their weapons on her. . Once at the scene plaintiff was yelled at, and ordered to leave, as plaintiff retreated back to her car, she was violently grabbed, by Officer Williams, slammed into the car, handcuffed and arrested. Plaintiffs daughter Iesha Medley who was at the scene screamed for the officer to be gentle with her mother, due to her recent back surgery, in where she had a spinal fusion done at Cooper University Hospital, in Camden. The officer ignored the pleas of Iesha Medley, (daughter) in regards to plaintiff delicate medical condition, causing re-injury to the neck, spine, right leg and back of plaintiffs body. Defendants acts violated 5.1-1 **Use of Excessive Force in Violation of 42 U.S.C. § 1983 .**

Defendant Officer Williams searched plaintiff while still in her nightclothes for bed, over the request of the plaintiff to have a female officer at the scene, making her feel very uncomfortable, exposed and publically humiliated, by the officer touching parts of her female anatomy, during her menstruation period, . The officers search was in a groping manner, in where her body was severely tender and vulnerable, **in Violation of 42 USC 1983, and sexual harassment.**

Plaintiff was arrested and held at Lindenwold Police Department for approx 1 Hour and placed in a cell with an open toilet, that was being screened by numerous male officers. Plaintiff displayed no signs of a suicidal nature and was searched before being placed in the cell in where she was videotaped using the bathroom during her menstrual cycle

Plaintiff as a female and practicing Christian, had a right to shield her body from the opposite sex and to privacy as it pertains to her menstrual period. **Christian modesty."** **Lumpkin v. Burns, 702 F. Supp. 242 (D. Nev. 1988).** Prisoners have right to shield his/her naked body from members of opposite sex; can sue on prison's use of see-through shower curtains and open toilets; may also sue for violation of her right to practice, **Christian modesty!**

Defendants male officers videotaping of plaintiff, who practices the Christian religion, without her knowledge. while using the bathroom during her time of menstruation, was arbitrary, because Plaintiff was in custody for a misdemeanor charge, that merely required her to be summonsed, released and not detained. Plaintiff requested the presence of female officer numerous times and was denied and at no times displayed any signs of suicidal intentions and/or mention suicide, nor was there any weapons or objects found on her, after she was searched several times, that would jeopardize the officers safety, before she was placed in detention. There was absolutely no need for this horrific invasion of privacy, that is routinely done on a normal basis to any female detained in Lindenwold, who practices the Christian faith.

Once plaintiff and her family viewed the videotapes, it resulted in severe emotional mental anguish, trauma and agoraphobia, in where plaintiff did not want to leave her home in Lindenwold, in fear of facing or seeing any Lindenwold Police Officers.

Plaintiff is now under the care of a licensed Psychiatrist for the mental and emotional stress, defendant actions caused. **Defendants are in violation of The 4th amendment**, unreasonable search and arbitrary detention, which resulted in the unnecessary videotaping of a female while on her menstruation cycle, who did not display any signs that she would be a problem to herself or the officers. Videotaping of a Christian woman's body while using the bathroom during her menstrual period, in where there was an expectation that she could tend to her personal hygiene and care while menstruating, out of the full view of the male officers, is paramount to societies views about female hygiene. The officers assured plaintiff that she would be released on a summons, before placing her in detention, as there was no need for the detention in which her private parts were videotaped, the detention was arbitrary and violated the **Right to privacy, due process and including plaintiff being sexually harassed** by male officers touching parts of her female anatomy, in a groping manner. **The Court has applied evolving standards not only to say what punishments are inherently cruel, but also to say what punishments that are not inherently cruel are nevertheless "grossly disproportionate. The 8th Amendment must draw its meaning from the evolving standards of decency that mark the progress of a maturing society.**

The Fourteenth Amendment provides further protection to individuals, prohibiting the state from depriving any person of life, liberty, or property, without due process of law. A female officer in which plaintiff requested should have been summoned to the scene. Plaintiff as a practicing Christian felt very uncomfortable exposing that she was menstruating to male officers, which is why she requested a female officer. The defendants have a long history of violating the constitutional rights of African Americans and women, customarily and by policy, who have been detained in the Lindenwold Police Department, for misdemeanor offenses, when detention is not required. There were no displays of suicidal intentions by the plaintiff nor where any weapons found that would jeopardize the safety of officers, after she was searched several times, once right before she was placed in the cell, where the videotaping took place.

Demand

\$150'000 in medical bills and treatment, including any future rehabilitation needed, and 35 million dollars in emotional damages. **Total 35'150'000 and a trial by jury.**
and another other relief the court deems appropriate.

Romona Berry Romona Berry Date 1-13-15

Rowan University School
Of Osteopathic Medicine



Department of Psychiatry

October 14, 2014

To whom this may concern,

At the request of my patient, I am writing to verify that Ramona Berry is under my care for PTSD and Major Depressive Disorder, Recurrent, Severe, with psychotic symptoms, since August 2014.

Her medications are as follows: Celexa, Remeron, Zyprexa, and Adderall. She is adherent to prescribed medication and all appointments.

Ms. Berry had no hx of Mental Health problems, other than ADD, until 2002, after her son was murdered at a Train Station and found dead of GSW in Camden, a case that remains unsolved, despite her own efforts and that of the Police Department.

In the following years she has lost several close family members, including her mother, and was in a MVA, sustaining disc herniation's, R side numbness, requiring surgical fusions, nerve blocks, despite which over time still resulted in her becoming physically disabled and on a prescription pain management regimen. She is also being treated for a Gynecological condition requiring hormone replacement therapy.

If there are any questions or concerns, please contact me at your convenience.

Sincerely,

Diane T. Palmer, Ed.M., MSN, APN

ANCC Board Certified Clinical Nurse Specialist - Advanced Practice Psychiatric Nurse

ROWAN UNIVERSITY

School of Osteopathic Medicine - Department of Psychiatry

Stratford Division - UDP-2500

42 E. Laurel Road,

Stratford, NJ 08084

Ph.: 856-566-6459

Fax: 856-566-6873

To the Clerk of the Court:

Please find enclosed an amended complaint. I understand that before the defendants are served with the complaint, I have the right to amend it. I choose to do so.

I am still awaiting the IFP application to be processed, so that I can use the US Marshall's Service to effect service of summons.

Romona Berry Romona Berry Date 1-13-15

Demetra Berry
98 Oak st
4803 The Landing Apts
Lindenwood N.J. 08021

U.S. POSTAGE
PAID
SICKLEBYVILLE, NJ
08081
JAN 13, 15
AMOUNT
\$0.49
00026317-16



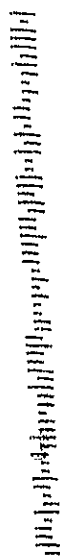
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JAN 15 2015

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AT 8:30
WILLIAM T. WALSH CLERK
M

U.S. District Court
3rd market st
Camden N.J. 08101
ATTN: Clerk



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AO 240A (Rev. 01/09; NJ 05/13) Order to Proceed Without Prepaying Fees or Costs

UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW JERSEY

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v.

THE BOROUGH OF LINDENWOLD
Defendant(s).

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PREPAYMENT OF FEES**

Civil Action No 1:14-cv-07343-RBK-AMD

Having considered the application to proceed without prepayment of fees under 28 U.S.C. §1915, IT IS ORDERED the application is:

☒ **GRANTED, and**

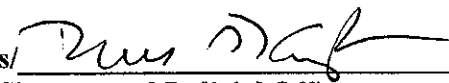
☒ **The clerk is ordered to file the complaint,**

☒ **IT IS FURTHER ORDERED, the clerk issue a summons and the U.S. Marshal serve a copy of the complaint, summons and this order upon the defendant(s) as directed by the plaintiff(s). All costs of service shall be advanced by the United States.**

☐ **DENIED, for the following reasons:**

☐ **IT IS FURTHER ORDERED, the clerk is ordered to close the file.**
Plaintiff(s) may submit payment in the amount of \$400 within 14 days
from the date of this order to reopen the case without further action from the
Court.

ENTERED this 10th day of January, 2014.

s/ 
Signature of Judicial Officer

ROBERT B. KUGLER
Name and Title of Judicial Officer