

Richard Hughes Justice Complex
25 Market Street
P.O. Box 080
Trenton, NJ 08625

RE: Tort Claims Notice for Aramis Rosario
Spoliation Letter.
Date of Incident: Endless and continuing series of incidents, last one
occurring on March 27, 2017

Dear Sir/Madam:

This office has been retained to represent Aramis Rosario for injuries and/or damages Mr. Rosario sustained by consistent harassment and unreasonable and excessive force employed against him by the continuous reckless and outrageous conduct of the following Carteret Borough Police Officers: Joseph Reiman, Dan Kelly, John Moody, Eric S. Reuter, Theodore Nycz and DSG Marcus Rosario.

(A) Name & Address of Client:

Aramis Rosario
313 Wagner Ave.
Perth Amboy, N.J. 08861

(B) Name & Address of Attorney:

Law Office of Kevin T. Flood, Esq., LLC
204 Towne Centre Dr.
Hillsborough, New Jersey 08844
Attention: Kevin T. Flood

(C) Date of Incidents and Locations: The incidents continued to occur over several months with the last incident occurring on March 27, 2017, in the Borough of Carteret, Middlesex County, New Jersey

(D) Description of Injuries: L.P. sustained injury to his head, face, and other parts of his body along with severe emotional distress.

(E) Responsible Parties: Mayor Daniel Reiman, and Officers Joseph Reiman, Dan Kelly, John Moody, Eric S. Reuter, Theodore Nycz, agents and/or officers and/or managers and/or managing members and/or employees and/or representatives and/or agents and/or servants who had actual and/or apparent authority to act on the behalf of the Borough of Carteret.

(F) Amount of Damages Claimed: \$5,000,000.00.

(G) SPOILIATION NOTICE: In relation to this filing, you are hereby put on Notice that you are required to preserve, protect and safeguard any and all documents, correspondences, emails, phone messages, phone logs, tape recordings, digital

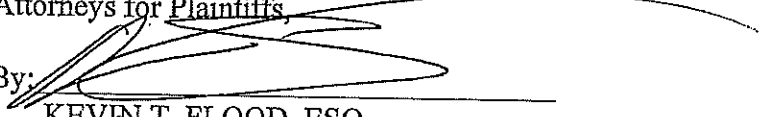
recordings, video and/or CD and/or DVD recordings, transcripts, photographs, sketches, medical documents, notes taken either by hand or through electric means, both internal and external memorandum, as well as any other related material, all of which shall be preserved until the statutory conclusion of this matter, or conclusion of any litigation. This Notice also applies to any and all of your subordinates and/or employees under your control and/or authority, including by not limited to secretaries, investigators, police officers/detectives, civilian employees, assistants and interns.

In particular, there is voluminous audio and video evidence, which includes, but is not limited to security and/or surveillance video, Motor Vehicle Recordings, body cameras and sound recordings relative to the numerous incidents that occurred against Aramais Rosario. Accordingly, this letter serves to put you on notice that any and all security and/or surveillance video, Motor Vehicle Recordings, body cameras and/or sound recordings relative to these numerous incidents, shall be maintained and preserved until the conclusion of this matter. No such data shall be destroyed, discarded, changed, repaired, or altered in any manner. The subject evidence is relevant to the plaintiff's cause of action.

Failure to comply with the terms of this Notice will result in an application to the Court for the imposition of any and all available sanctions to be imposed for the spoliation of any of the requested preservation of items.

Should you have any questions regarding this matter, please feel free to contact me at 908-705-2623.

LAW OFFICE OF KEVIN T. FLOOD, LLC
Attorneys for Plaintiffs,

By: 

KEVIN T. FLOOD, ESQ.
I.D. # 005662003

Dated: June 20, 2017

William J. Garces
William N. Grabler ♦
Lawrence A. LeBrocq, LL. M. ★□

Alan T. Grening ■□
Jonathan A. Kessous ♦♦♦
Arlindo B. Araujo □♦
Joseph T. Delgado
Michelle M. Tullio
Ileana J. Montes
David E. Rehe ♦
Anna M. Buontempo ♦
Robert B. White, III □
Nicholas L. Krochta
Michele LaBrada
Genevieve G. Redd □♦
Michael D. Pomerantz □
Matthew V. Futerfas
Mena R. Francis
Karina Garcia
Brian A. Lara
Jean-Claude Labady

Paul A. O'Connor III - Of Counsel ★

■ Member DC Bar
□ Member PA Bar
♦ Member NY Bar
● Certified by The Supreme Court of New Jersey
as a Workers' Compensation Law Attorney
★ Certified by The Supreme Court of New Jersey
as a Civil Trial Attorney
* Certified by The Supreme Court of New Jersey
as a Criminal Trial Attorney
◇ Certified by The Supreme Court of New Jersey
as a Municipal Court Trial Attorney

February 16, 2018

Via Regular Mail & Certified RRR

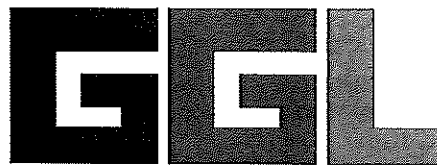
Department of Transportation
1035 Parkway Avenue
Trenton, NJ 08625

Borough of Carteret
Memorial Municipal Building
61 Cooke Avenue
Carteret, NJ 07008

County Clerk
County of Middlesex
Administration Bldg., 4th Floor
75 Bayard Street
New Brunswick, NJ 08901

State of New Jersey
Department of Law and Public Safety
Hughes Justice Complex
25 West Market Street
Trenton, NJ 08625

Office of the Attorney General
Department of Law and Public Safety
25 West Market Street
Trenton, NJ 08625



GARCES, GRABLER & LEBROcq

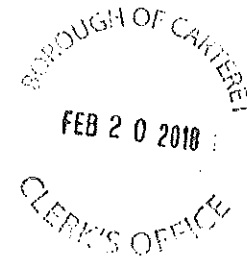
A PROFESSIONAL CORPORATION

235 LIVINGSTON AVENUE
NEW BRUNSWICK, NJ 08901

732.317.0704 Direct Dial
732.220.1555 Fax

www.garcesgrabler.com

Se habla Español



2 South Broad Street
Elizabeth, N.J. 07202
(908) 416-0001
(908) 416-0002 Fax

6 Throckmorton Street
Freehold, N.J. 07728
By Appointment Only
(732) 414-5000
(732) 414-5001 Fax

20 Green Street
Newark, N.J. 07102
(973) 848-0500
(973) 848-1601 Fax

502 Amboy Avenue
Perth Amboy, N.J. 08861
(732) 826-2300
(732) 826-4027 Fax

415 Watchung Avenue
Plainfield, N.J. 07060
(908) 769-3366
(908) 769-7893 Fax

253 E. Front Street
Trenton, N.J. 08611
(609) 393-0700
(609) 393-8581 Fax

325 South River Street
Hackensack, NJ 07601
(201) 857-8100
(201) 857-8101 Fax

2 Penn Center, 1500 JFK Blvd.
Suite 605
Philadelphia, PA 19102
(215) 837-3704
(609) 393-2383 Fax

Reply to: New Brunswick

2-20-18
3-20-18
Copies to
B. Baumgartner
& R. Berger
JB

Re: James Ellis
Date of Accident: January 17, 2018
Our File No.: 285617

Dear Sir/Madam:

In connection to the above captioned accident, enclosed please find original and one copy of Tort Claim Notice for the above claimant. Kindly forward same to the appropriate person for handling.

Please contact this office if you should have any questions concerning this matter. Thank you for your cooperation in this matter.

Kindly mark your file accordingly.

Very truly yours,
GARCES, GRABLER, & LEBROCQ, P.C.



Michele Labrada, Esq.

ML/nb
Encl.

Certified Mail RRR NJDOT - 9590 9402 2939 7094 4361 85
Borough of Carteret - 9590 9402 2939 7094 4361 78
County Clerk - 9590 9402 2939 7094 4361 61
State of NJ - 9590 9402 2939 7094 4361 54
Attorney General - 9590 9402 2939 7094 4361 23