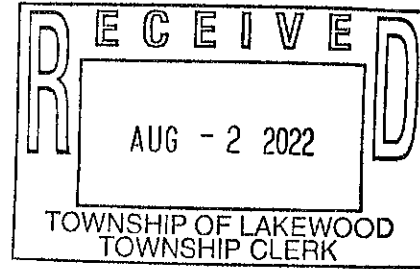


Steven D. Cahn, Esq.-ID#035021986
CAHN & PARRA, LLC
1015 New Durham Road
Edison, New Jersey 08817
(732) 650-0444
Attorney for Plaintiff



UJJWALA JAIN,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff,	:	OCEAN COUNTY
	:	DOCKET NO. OCN-L-1637-22
vs.	:	
MATTHEW T. McKee, and	:	<u>CIVIL ACTION</u>
LAKEWOOD TOWNSHIP,	:	
	:	
Defendant.	:	SUMMONS

From the State of New Jersey

To the Defendant(s) named above: **LAKEWOOD TOWNSHIP, 231 3rd Street,
Lakewood, New Jersey**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Ocean County, 118 Washington Street, Toms River, New Jersey 08754. A filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. These numbers may be listed in the yellow pages of your phone book or may be obtained by calling the New Jersey State Bar Association Referral Service.

/s/ Michelle M. Smith
Michelle M. Smith, Superior Court Clerk

Dated: July 27, 2022

Steven D. Cahn, Esq.-ID#035021986
CAHN & PARRA, P.A.
1015 New Durham Road
Edison, New Jersey 08817
(732) 650-0444
Attorney for Plaintiff

UJJWALA JAIN,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff,	:	OCEAN COUNTY
	:	DOCKET NO.
vs.	:	
MATTHEW T. McKee, and	:	<u>CIVIL ACTION</u>
LAKEWOOD TOWNSHIP,	:	
Defendant.	:	COMPLAINT WITH JURY DEMAND,
	:	DESIGNATION OF TRIAL COUNSEL
	:	

Plaintiff, *Ujjwala Jain*, residing at 145 Chickadee Court, in the Township of Freehold, County of Monmouth, State of New Jersey, by way of Complaint against the defendant, says:

FIRST COUNT

1. On or about January 13, 2022, plaintiff, *Ujjwala Jain*, was the driver of a certain motor vehicle which was traveling eastbound on Route 88 and was stopped in traffic, in Brick Township, New Jersey.

2. At the aforesaid time and place, the defendant, *Matthew T. McKee*, a Lakewood Township Police Officer was operating a Lakewood Township police vehicle in a nonemergency situation and was traveling behind the plaintiff eastbound on Route 88 in Brick Township, New Jersey.

3. The defendant, *Matthew T. McKee*, did operate his vehicle negligently, carelessly, and recklessly so as to strike the rear of the plaintiff's vehicle causing plaintiff to move forward into oncoming westbound traffic on Route 88 in Brick Township, New Jersey and having her vehicle struck by another motor vehicle.

4. At the time and place the defendant, *Matthew T. McKee*, was acting within the scope of his employment as a Lakewood Township Police Officer.

5. At the time and place of the accident the defendant, *Lakewood Township*, owned the motor vehicle, which was operated by the defendant, *Matthew T. McKee*.

6. As a direct result of the negligence of the defendants, *Matthew T. McKee and Lakewood Township*, the plaintiff, *Ujjwala Jain*, was seriously and permanently injured, suffered and in the future will experience great pain and suffering, did and in the future will be required to expend large sums of money for medical care and attention, and has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

7. As a direct and proximate result of the aforesaid negligence of the defendants, the plaintiff, *Ujjwala Jain*, has sustained a personal injury resulting in one or more of the following:

- a. death;
- b. dismemberment;
- c. significant disfigurement;

- d. fracture;
- e. loss of a fetus;
- f. permanent loss of use of a body organ, member, function, or system;
- g. permanent consequential limitation of use of a body organ or member;
- h. significant limitation of use of a body function or system, or
- i. a medically determined injury or impairment of a non-permanent nature which prevents the injured person from performing substantially all of the material acts which constitute that person's usual and customary daily activities for not less than 90 days during the 180 days immediately following the occurrence of the injury or impairment.

WHEREFORE, plaintiff, *Ujjwala Jain*, demands judgment against the defendants, *Matthew T. McKee*, and *Lakewood Township*, for damages, interest, and costs of suit.

**DEMAND FOR ANSWERS TO UNIFORM AND SUPPLEMENTAL
INTERROGATORIES**

Pursuant to Rule 4:17-1(b), the plaintiff hereby demands that the defendant provide answers to the Uniform Form C interrogatories.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues so triable.

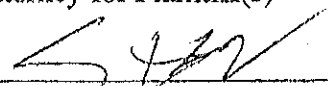
DESIGNATION OF TRIAL COUNSEL

STEVEN D. CAHN, Esquire, is hereby designated as trial counsel for the Plaintiff in the within matter.

I certify that the matter in controversy is not the subject of any other action or arbitration proceedings, now or contemplated.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

CAHN & PARRA
Attorney for Plaintiff(s)



STEVEN D. CAHN, ESQ.

Date: July 27, 2022

Civil Case Information Statement

Case Details: OCEAN Civil Part Docket# L-001637-22

Case Caption: JAIN UJJWALA VS MCKEE MATTHEW

Case Initiation Date: 07/27/2022

Attorney Name: STEVEN D CAHN

Firm Name: CAHN & PARRA, LLC

Address: 1015 NEW DURHAM ROAD

EDISON NJ 08817

Phone: 7326500444

Name of Party: PLAINTIFF : Jain, Ujjwala

Name of Defendant's Primary Insurance Company

(If known): Unknown

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same
transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Ujjwala Jain? NO

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? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? 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? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? YES Consumer Fraud? NO

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 Rule 1:38-7(b)

07/27/2022

Dated

/s/ STEVEN D CAHN

Signed