



17 North Main Street • Medford • NJ 08055 • 609/654-2608

www.medfordtownship.com

MAIN FAX 609/953-4087

CLERK/FINANCE FAX 609/714-1790

CONSTRUCTION FAX 609/953-7720

PUBLIC WORKS FAX 609/654-7646

July 29, 2020

Via email: opra+equest-12528-8ac9697a@requests.opramachine.com

Dear Taeho Kim:

The Township of Medford received your Open Public Records Act (OPRA) request on May 27, 2020. The official Records Custodian received your OPRA request on May 27, 2020. As such, the seven (7) business day deadline to respond to your request is June 8, 2020, with a forty-five (45) day extension deadline to respond to your request is July 29, 2020.

The following records are being requested: A list of lawsuits and cases in which any officer of the police department was involved between 2012 and 2019. For each lawsuit/case, please provide the date (month and year) of the alleged incident at issue, whether the alleged incident was excessive force, settlement amount (if any), and final compensation amount ruled (if any). Please provide copies of the complaint in any lawsuits and cases described above.

The attached records are responsive to your request. All personal identification information has been redacted in part pursuant to N.J.S.A. 47:1A-1.1. As this request is being provided by email, there is no cost for your request.

- Steinberg, d/a: 8/2/14-complaint attached. MSJ granted-no money paid.
- WM Dunn, d/a: 10/20/13-complaint attached. MSJ granted-no money paid.
- Joseph Miles, d/a: 10/29/10 but complaint filed within the OPRA dates (2012-2019)-complaint attached. Dismissed-no money paid.
- Paul Schoellkopf, d/a: 7/23/10 but complaint filed within the OPRA dates-complaint attached-\$75,000 paid as \$49,988.13 to counsel and \$26,011.87 to Plaintiff.

If your request for access to a government record has been denied or unfilled within the seven (7) business days required by law, you have a right to challenge the decision by the Township of Medford to deny access. At your option, you may either institute a proceeding in the Superior Court of New Jersey or file a complaint with the Government Records Council (GRC) by completing the Denial of Access Complaint Form. You may contact the GRC by toll-free telephone at 866-850-0511, by mail at P.O. Box 819, Trenton, NJ, 08625, by e-mail at grc@dca.state.nj.us, or at their web site at www.state.nj.us/grc. The GRC can also answer other questions about the law. All questions regarding complaints filed in Superior Court should be directed to the Court Clerk in your County.

Sincerely,

Krystle Garrison,
Administrative Assistant
To the Manager

F. MICHAEL DAILY, JR., LLC
ATTORNEY AT LAW
216 Haddon Avenue • Sentry Office Plaza
Suite 106
Westmont, New Jersey 08108
Telephone No. [REDACTED]
Fax No. [REDACTED]
Our File #F-2362-12

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAUL SCHOELLKOPFF, : CIVIL ACTION NO.
Plaintiff, :
v. :
CRAIG HUMBLE, TOWNSHIP OF : COMPLAINT
MEDFORD, AND JOHN DOES #1 TO 10 :
: (Electronically Filed)
Defendant

____ Plaintiff, by way of complaint against the defendants,
hereby avers:

PARTIES, JURISDICTION AND VENUE

1. The plaintiff, Paul Schoellkopff, is an individual who resides at 6 Aldworth Court, Medford, Burlington County, New Jersey.

2. The defendant, Township of Medford, is a governmental entity created under the laws of the State of New Jersey and maintains a principal place of business at 17 North Main Street, Medford, Burlington County, New Jersey.

3. The defendant Craig Humble, is an individual who at all times relevant to this matter was employed as a police officer by the Township of Medford.

4. Defendants, John Does #1 to 10, are individuals, whose identities are unknown at the present time, who, while employed as a police officers and supervisors by the Township of Medford, assisted, directed and/or approved the actions of defendant, Craig Humble, in the seizing, charging and incarcerating the plaintiff.

5. The aforesaid individual defendants are sued in their official and individual capacities.

6. This suit arises under the United States Constitution and the laws of the United States and is brought pursuant to 42 U.S.C. §1983, together with pendent state law claims.

7. The Court has jurisdiction over plaintiff's federal claims pursuant to 38 U.S.C. §1331, as an action arising under the Constitution of the United States, and 28 U.S.C. §1343(A)(3), to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States; and over plaintiffs pendent state law claims pursuant to 28 U.S.C. §1367.

8. Venue is properly laid pursuant to 28 U.S.C. §1391(b) in the District of New Jersey, because defendant is located in this district, and the events giving rise to the claim occurred in this district.

FACTUAL ALLEGATIONS

9. At all times relevant to this complaint, the plaintiff was the spouse of Ann Schoellkopf and prior to July 19, 2010, resided with said spouse and their 3 children at 401 Valley Forge Court, Medford, New Jersey.

10. On July 19, 2010, Ann Schoellkopf made an application under the New Jersey Law for the Prevention of Domestic Violence, N.J.S.A. 2C:25-17 et seq. for a temporary restraining order (hereafter, "TRO") against the plaintiff.

11. The aforesaid application was made and adjudicated without any notice to the plaintiff or an opportunity to be heard.

12. The aforesaid application was reviewed by a judge of the New Jersey Superior Court, granted and served upon the plaintiff by a Medford Police Officer at 6:30 pm on July 19, 2010.

13. The TRO entered by the court ordered Paul Schoellkopf to vacate the family home within 15 minutes.

14. The TRO entered by the court ordered Paul Schoellkopf not to have any contact with Ann Schoellkopf.

15. The TRO entered by the court ordered that Ann Schoellkopf have custody of the children.

16. The TRO entered by the court ordered that a hearing would be held on July 26, 2010 as to whether the restraints should be made permanent.

17. The TRO entered by the court did not order "support" for

Ann Schoellkopf or the children.

18. The TRO entered by the court did not order "emergent support" for Ann Schoellkopf or the dependant children.

19. Paul Schoellkopf complied with all of the aforesaid conditions contained in the TRO.

20. Notwithstanding the foregoing, on Friday, July 23, 2010 in the late evening, the defendant Craig Humble accompanied by certain of the John Does, appeared at the home of the plaintiff's parents located at 251 Amsion Road which was where the plaintiff was staying.

21. At that time, without performing any investigation and without any legal or factual basis, they arrested, handcuffed, and transported Paul Schoellkopf to the Medford Police facility.

22. At headquarters Paul Schoellkopf was accused of violating the TRO by not providing support to his spouse.

23. Specifically his was told that he had failed to provide support by closing a joint bank account.

24. In response Paul Schoellkopf demonstrated with his phone that the joint account was still open and that funds were in it.

25. Paul Schoellkopf was then told that he was being criminally charged with violating the TRO and he would be incarcerated in the Burlington County Jail until his bail was set.

26. Thereafter he was formally charged with violating N.J.S.A. 2C:29-9B by failing to provide "ongoing support (access to

money from joint bank account)" to his spouse.

27. At this time "A. G. Guidelines" promulgated by the Attorney General of New Jersey, which guidelines control the conduct of all law enforcement officers in said state, provided in regard to TRO violators that: "On weekends, holidays and other times when the court is closed, bail should be set by the designated emergent duty Superior Court judge [and that if] the defendant is unable to post bail, take appropriate steps to have the defendant incarcerated at police headquarters or the county jail."

28. Notwithstanding the foregoing the defendants failed to apply for bail while the plaintiff was in their custody.

29. The defendants then transported the plaintiff to the Burlington County Jail, where as part of the admission process he was strip searched.

30. The plaintiff was then held for 12 hours in a cell with numerous other prisoners.

31. Because no bed was available the plaintiff had to sleep on the floor.

32. Eventually bail was set in the amount of \$2,000, plaintiff's parents posted it and he was released.

33. Prior to the foregoing the plaintiff had never been arrested, placed in physical custody, or charged with any criminal or disorderly persons' offenses.

34. On July 26, 2010, a plenary hearing was held on the complaint of Ann Schoellkopf against the plaintiff.

35. At the conclusion of the hearing the court determined that allegations of domestic violence had not been substantiated and it dismissed the complaint and terminated all restraints.

36. On July 26, 2010, the aforesaid charges that had been filed by defendant, Humble, were received by the Office of the Prosecutor of Burlington County.

37. On August 18, 2010, said charges were administratively dismissed by the Prosecutor because it was beyond issue that they were baseless.

38. As a result of the aforesaid seizure and charges Paul Schoellkopf sustained pecuniary losses in the form of costs associated with his defense.

39. As a result of the aforesaid charges Paul Schoellkopf sustained non-pecuniary losses in the form of emotional distress including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and such other non-pecuniary losses as maybe disclosed in discovery.

40. The aforesaid actions of the individual defendants were willful and intentional and especially egregious.

First Count

41. The aforesaid actions of the defendants, Craig Humble and John Does #1 to 10, in seizing the person of the plaintiff and

charging the plaintiff with criminal acts when they had no probable cause to do so, constituted an unreasonable search and seizure in violation of the Fourth Amendment.

42. The aforesaid actions were approved by upper level police supervisors who were final decision makers.

43. The aforesaid actions were the result of formal and informal policies of the Medford Township that directed and encouraged such actions and which ignored applicable Attorney General Guidelines.

44. As a result of the foregoing actions of the individual defendants and the policies of the defendant Medford, the plaintiff sustained the foregoing damages.

45. Pursuant to 42 U.S.C. §1988, plaintiff is entitled to attorney's fees and expert fees in connection with the bringing of the claims alleged in this count.

Wherefore, plaintiff, demands judgement against the defendants for:

- a. Compensatory damages;
- b. Nominal damages in the event no compensatory damages are allowed;
- c. Punitive damages from the individual defendants;
- d. Costs of the action;
- e. Reasonable attorney's fees and costs; and,
- f. Such other and further relief as this Court may deem

Jury Demand

Plaintiff herewith demands a jury trial as to all issues which are triable by jury.

F. MICHAEL DAILY, JR., LLC
Attorney for the Plaintiff

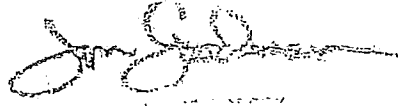
BY: *F. Michael Daily, Jr.*
F. Michael Daily, Jr.

Dated: July 22, 2012.

SUPERIOR COURT BERGEN COUNTY

FILED

FEB 14 2013



William Dunn
 Name
 50 Clairmont Ave. Westwood, N.J. 07675
 Address
 [REDACTED]
 Telephone Number

William Dunn
 Plaintiff

v.

Jason Deorian, Robert Romano.
 Defendant (s)

Superior Court of New Jersey

Law Division Bergen County

Docket No (to be filled in by the court)

CIVIL ACTION
 Complaint

Plaintiff, William Dunn, residing at
 (your name)
 50 Clairmont Ave City of Westwood
 (your address) (your city or town)
 County of Bergen
 (your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On 6/20, 2012, Jason Deorian, Robert Romano, Defendant
 (name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Defendant Robert Romano : Defendant Robert romano made false statements to a police officer in regards to an investigation into fraudulent electronic payments on a bank account that I was named as a owner of that account. Defendant Robert Romano made false statements to a police officer as to the sale of a motor vehicle that I suffered financial loss in which I had to pay taxes on vehicle in which there was no actual sale.

The defendant in this action resides at 113 South Plymouth Court, Southampton, N.J.,
(defendant's address)

In the County of Burlington, State Of New Jersey.
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.
3. The harm that occurred as a result of defendant's acts include:

(list each item of damage and injury),

1. Defendant Robert Romano. In making false statements to a police officer about the fraudulent electronic payments that he made on a account that I was named on myself in which I suffered financial loss to attempt to recover the lost funds as a result of his thefts of monies from that account.
2. Defendant Robert Romano. In making false statements to a police officer in a investigation as to the fraudulent listing of sales tax on a motor vehicle of which he had no authority to do so, caused the plaintiff to suffer financial loss into paying sales tax when the vehicle transaction was basically a turning over of the title of the vehicle
3. Defendant Robert Romano. In making false statements as to my character which caused the investigation of matters to be one of bias and discrimination. By the Defendant's responses in a deposition that were false, the action caused my standing as witness in criminal charges against the defendant to be affected un justly.

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 01/20/2013

Signature: 

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made

a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 01/20/2013

Signature: William Sund

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court *Rules* 1:8-2(b) and 4:35-1(a).

Dated: _____

Signature: _____

RECEIVED

2013 MAR 25 P 12:15

CIVIL DIVISION
CASE PROCESSING

William Dunn

Name

50 Clairmont Ave. Westwood, N.J. 07675

Address

Telephone Number

William Dunn

Plaintiff

v.

Judge Charles Powers, Jr.

Defendant (s)

Superior Court of New Jersey

Law Division Bergen County

Docket No L-000085-13

(to be filled in by the court)

CIVIL ACTION

Complaint

ORDER TO SHOW
CAUSE

Plaintiff, William Dunn, residing at

(your name)

50 Clairmont Ave

(your address)

City of Westwood

(your city or town)

County of Bergen

(your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On March 22, 2013, Judge Charles Powers Jr., Defendant
(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Caused Bias With Malice, Discrimination Against A Disabled Person, Refusal And Denial
Of Medical Doctor's Diagnosis And Directive Excusing Plaintiff From Personal
Appearance As Well As Appearance By Teleconference. Defendant Powers Violated
The Civil Rights Of A Disabled Person With Malfeasance, Derogatory Statements In Total
Character Assassination Of Plaintiff. (SEE ATTACHED STATEMENT OF CLAIMS))

The defendant in this action resides at 10 Main Street, Hackensack ,
(defendant's address)

In the County of Bergen , State Of New Jersey.
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.

3. The harm that occurred as a result of defendant's acts include:

(list each item of damage and injury),

1. Defendant Powers Violated The Civil Rights Of A Disabled Person, Refusing To Accept Medical Doctor's Directive Statement Excusing The Plaintiff From In Person and Teleconference Appearance Due To Plaintiff's Medical Condition And Disability.
2. Defendant Powers Allowed And Accepted Ex Parte Communications And Correspondence From Defendant Rothmel Who Manipulated The Court Of Powers And Defendant Powers Allowed Infiltration Of The Civil Lawsuit By Allowing Powers and The Court To Be In Receipt Of Perverted Injustice Committed By The Defendant.
3. Defendant Powers Allowed And Accepted Correspondence And Motions By The Defendant Rothmel Without The Plaintiff Being Copied And In Receipt Of Motions And Correspondence.
(SEE ATTACHED STATEMENT OF LIST DETAIL OF DAMAGE AND INJURY)

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 03/23/2013 Signature: William Dunn

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made

a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 03/23/2013 Signature: William Davis

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court *Rules* 1:8-2(b) and 4:35-1(a).

Dated: 03/23/2013 Signature: William Davis

<u>William Dunn</u> , [Insert the plaintiff's name], Plaintiff(s), v. <u>Judge Charles E Powers</u> , [Insert the defendant's name], Defendant(s).	Superior Court of New Jersey Law Division Bergen County Civil Part Docket No.: L-000085-13 CIVIL ACTION ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINTS PURSUANT TO RULE 4:52
--	--

THIS MATTER being brought before the court by William Dunn, attorney for plaintiff, [insert the plaintiff's name], seeking relief by way of temporary restraints pursuant to R. 4:52, based upon the facts set forth in the verified complaint filed herewith; and it appearing that [the defendant has notice of this application] or [defendant consent's to plaintiff's application] or [immediate and irreparable damage will probably result before notice can be given and a hearing held] and for good cause shown.

It is on this ____ day of _____ ORDERED that defendant, [insert the defendant's name], appear and show cause before the Superior Court at the _____ County Courthouse in _____, New Jersey at ____ o'clock in the ____ noon or as soon thereafter as counsel can be heard, on the ____ day of _____, 20 ____ why an order should not be issued preliminarily enjoining and restraining defendant, [insert the defendant's name], from

A. [Set forth with specificity the return date relief that the plaintiff is seeking.];

B. 3/26/2013;

C. ORDER TO SHOW CAUSE MUST BE HEARD IN ANOTHER COUNTY

D. Granting such other relief as the court deems equitable and just.

And it is further ORDERED that pending the return date herein, the defendant is [temporarily] enjoined and restrained from:

A. [Set forth with specificity the temporary restraints that the plaintiff is seeking.];

Restrain & Prevent Judge Powers From Proceeding in Docket L-000085-13

- B. Recusal Of Judge Powers. _____;
- C. Civil Rights Violations Against Judge Powers. _____

And it is further *ORDERED* that:

1. The defendant may move to dissolve or modify the temporary restraints herein contained on two (2) days notice to the [plaintiff's attorney *or alternate*: plaintiff].
2. A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendant [personally *or alternate*: describe form of substituted service] within ____ days of the date hereof, in accordance with *R. 4:4-3* and *R. 4:4-4*, this being original process.
3. The plaintiff must file with the court his/her/its proof of service of the pleadings on the defendant no later than three (3) days before the return date.
4. Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by _____, 20___. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. You must send a copy of your opposition papers directly to Judge _____, whose address is _____, New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$ _____ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.
5. The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by _____, 20___. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge _____.
6. If the defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default,

provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

7. If the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

8. Defendant take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at

http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Include a \$_____ filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). 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. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

10. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than ____ days before the return date.

J.S.C.

United States District Court
District of New Jersey

Titles of Action: Redress as towards Deprivation Of Constitutional Rights

Joseph A. Miles Jr., Pro Se
Plaintiff
vs

Civil Action Number
1:10-cv-06179-MEH-KMW

Safeer Ansari, MD (Lourdes Medical Center)
Willingboro, NJ, John and Jack Doe
Medford Township Police Department,
Robert Doe (SCIP Drenk Foundation, Willingboro
NJ) Mark Doe (Lourdes Medical Center,
Willingboro, NJ)
Defendants

COMPLAINT

Plaintiff: Joseph A. Miles, Jr. Pro Se
24 Georgia Trail
Medford, New Jersey
08055

Defendants: Various, as denoted
above:
Lourdes Medical Center
Willingboro, NJ 08046

Medford Township Police Department
Medford, NJ 08055

Jurisdiction

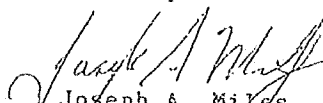
Basic provisions of the United States Constitution; to seek redress in the Federal Courts of the United States

Cause of Action

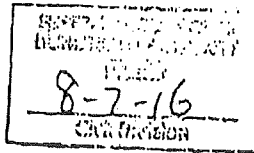
Deprivation of Plaintiff's Constitutional rights, involuntary incarceration., Defendants acted to cause Plaintiff's incarceration, took custody of Plaintiff without due process of law and with threat to cause bodily harm. John and Jack Doe, of the Medford Police Department, were armed and a threat to Plaintiff. Incarceration was from October 29, 2010 to November 12, 2010; a period of 13 days.

demand

Demand for trial by Jury, with relief sought being in the amount of \$100,000.00 in punitive damages.


Joseph A. Miles, Jr.
Plaintiff Pro Se

ZUCKER STEINBERG & WIXTED
By: Saul J. Steinberg
Attorney Id: 009271973
415 Federal Street
Camden, New Jersey 08103
[REDACTED]



SUPERIOR COURT
BURLINGTON CO.
2016 AUG -8 PM 3:54
RECEIVED
BY: D05

HAYLEY STEINBERG,

Plaintiff

vs.

PHILIP D'ALAONZO,

Defendants

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION
: BURLINGTON COUNTY

: DOCKET NO. L-1630-16

: Civil Action

: COMPLAINT & DEMAND FOR JURY
: TRIAL

Plaintiff, Hayley Steinberg, residing at 4 Braddock's Mill Court, in the City of Medford,
County of Burlington, State of New Jersey, says by way of Complaint as follows:

1. On or about August 2, 2014, Plaintiff, Hayley Steinberg, was at her residence located at 4 Braddock's Mill Court, in the City of Medford, County of Burlington, and State of New Jersey.
2. At that time, defendant, Philip D'Alonzo, was a Medford police officer who came to the residence at the request of Plaintiff's mother.
3. Plaintiff was asleep at the time defendant entered her residence, and was startled awake by the defendant.
4. At that time, defendant decided to place Plaintiff under arrest.
5. Defendant used excessive force during the arrest causing Plaintiff to sustain injuries.

WHEREFORE, Plaintiff, Hayley Steinberg, demands Judgment on this Count against the Defendant, Philip D'Alonzo,, jointly, severally or in the alternative for the following:

- a. Such damages, both compensatory and/or punitive as will reasonably compensate Plaintiff;
- b. Interest;
- c. Costs of suit;
- d. Reasonable attorney's fees as are permitted and/or authorized by the Constitutions of The United States and the State of New Jersey and/or 42 USC 1981 et seq; and
- e. Such other relief as the Court deems just and equitable.

ZUCKER STEINBERG
& WIXTED, PA

BY: _____

SAUL J. STEINBERG
Attorneys for Plaintiff

Dated: August 2, 2016

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff in the above-entitled action hereby demand a trial as to all issues by a jury.

ZUCKER STEINBERG
& WIXTED, PA

BY: _____

SAUL J. STEINBERG
Attorneys for Plaintiff

Dated: August 2, 2016

McCRINK, KEHLER & McCRINK

Matthew R. McCrink, Esquire

Attorney Id No.: 285601972

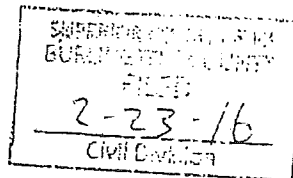
475 Route 73 North

West Berlin, NJ 08091

Tel: [REDACTED]

Fax: [REDACTED]

Attorneys for Plaintiff Philip D'Alonzo



CLERK
EY: COE

PHILIP D'ALONZO,

Plaintiff,

v.

HAYLEY D. STEINBERG, DIANNE
STEINBERG, JOHN DOES ONE, TWO,
AND THREE

Defendants

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY, LAW DIVISION

DOCKET - L-440-16

CIVIL ACTION

COMPLAINT

Plaintiff, PHILIP D'ALONZO, (Hereinafter Plaintiff) by way of Complaint against Defendant(s), alleges as follows

FACTUAL BACKGROUND

1. At all relevant times, Plaintiff was a police officer in the township of Medford, County of Burlington, State of New Jersey when this cause of action arose. Defendants resided in the Township of Medford at 4 Braddock's Mill Court, County of Burlington, State of New Jersey.
2. On August 2, 2014, Plaintiff was brought to the home of HAYLEY D. STEINBERG and DIANNE STEINBERG regarding a request of Defendant DIANNE STEINBERG regarding problems with her daughter HAYLEY D. STEINBERG.

- 3 Defendant Dianne Steinberg directed Plaintiff to the location of her daughter knowing she was under the influence of drugs or prescription medications or alcohol, had a history of being violent, and was a danger to the officer without giving him any warning of her daughter's violent tendencies
- 4 Defendant Hayley D. Steinberg when approached by Officer D'Alonzo, while she was under the influence of a controlled dangerous substance, alcohol, or other medications negligently tried to wrestle with Plaintiff inflicting injury and permanent damage to his right ear and hearing
- 5 Defendant Dianne Steinberg took no action to assist Officer D'Alonzo and allowed her daughter to wrestle with the officer without provocation or warning or intervention
- 6 The true names and/or capacities, whether individual, corporate, associate or otherwise of Does 1-5, inclusive, are unknown to Plaintiffs at this time, and who therefore sue said defendant by such fictitious names. Plaintiffs are informed and believe and thereupon allege that each of the defendants fictitiously named herein as DOES are legally responsible, negligently or in some other actionable manner, for the events and happening hereinafter referred to and thereby proximately and legally caused the injuries and damages to Plaintiffs as hereinafter alleged.

FIRST COUNT
CLAIM OF NEGLIGENCE DIANNE STEINBERG

1. Plaintiff repeats the allegations of paragraphs one through six as though the same were set forth at length herein.
2. As an invitee into the home of Dianne Steinberg, Plaintiff was owed the highest duty of care as regards known dangers and threats to his welfare by defendant homeowner Dianne

Steinberg Dianne Steinberg knew of the threat her daughter posed to the Plaintiff but did not warn him of her daughter's violent nature

3 As a business invitee on Defendant's premises, Plaintiff was owed the highest duty in the care and maintenance of the premises, including the obligation to affirmatively investigate, monitor for, seek out and correct defects or conditions of which it knew or should have known upon reasonable inspection.

4 Defendant Dianne Steinberg breached her duty to Plaintiff by failing to detect, prevent, correct or cure the defective and dangerous condition her daughter represented, in that she allowed her daughter to reside in her home and consume drugs and or alcohol which posed a danger not only to her daughter Co-Defendant Hayley D Steinberg but to the infant child in her daughter's care, and innocent persons entering the home to assist defendant Dianne Steinberg, notably Plaintiff Philip D'Alonzo

5 As a direct and proximate result of Defendant's breach of duty and negligence in failing to detect, prevent, correct or cure the dangerous condition or defect, the Plaintiff sustained a serious and permanent injury to his person including but not limited to a an ear drum injury and a blunt trauma to the head causing permanent hearing loss in his right ear and tinnitus.

6 As a direct result of the aforesaid injury Plaintiff missed significant time from work was required to undergo surgery to his right ear, was charged with sick days against his accrued benefits and suffered related losses for transportation to the care facilities and medical treatment.

7 Plaintiff's injuries are significant and permanent with their complications are likely to continue permanently

WHEREFORE, Plaintiff hereby demands judgment against Defendant Dianne Steinberg for

(a) All damages sustained and costs incurred.

- (b) Interest and costs of suit;
- (c) Reasonable attorneys' fees
- (d) Such further relief as the Court may deem equitable and just

SECOND COUNT
CLAIM OF NEGLIGENCE DEFENDANT HAYLEY D. STEINBERG

- 1 Plaintiff repeats and realleges the allegations of the first count as if set forth at length
- 2 Defendant Hayley D Steinberg negligently caused injury to Plaintiff as a result of her lack of control of her rational faculties due to her state of intoxication or medication or drug use
- 3 Defendant Hayley D Steinberg was otherwise careless and negligent in her contact with Plaintiff in failing to control her actions when approached by Plaintiff resulting in injury and loss to Plaintiff.

WHEREFORE PLAINTIFF DEMANDS JUDGMENT:

- (a) For all damages sustained;
- (b) For lost benefits and sick time;
- (c) For reasonable attorneys fees and costs;
- (d) For such other relief as shall be deemed equitable and just

THIRD COUNT
CLAIM OF NEGLIGENCE JOHN DOES ONE, TWO, THREE

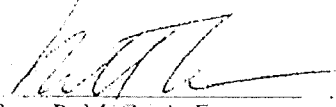
- 1 Plaintiff repeats and realleges the allegations of counts one and two as if set forth at length
- 2 John Does one, two, and three are unknown parties who have responsibility for the care and control of defendant Hayley D Steinberg and should have maintained the premises in such a fashion that no improper substances were available to her causing her to act irrationately and

(negligently towards Officer D'Alonzo, which resulted in his injuries

WHEREFORE PLAINTIFF DEMANDS JUDGMENT

- (a) For all damages sustained;
- (b) for all lost benefits and wages;
- (c) for reasonable attorneys fees and costs;
- (d) for such other relief as the court shall deem equitable and just

McCRINK, KEHLER & McCRINK

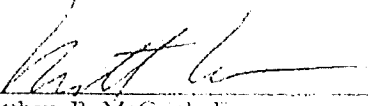
By: 
Matthew R. McCrink, Esquire

DATED February 22, 2016

JURY DEMAND

Pursuant to R. 1:8-1(b) and R. 4:35-1 of the New Jersey Court Rules, Plaintiff(s) hereby demand a trial by Jury for all issues so triable

McCRINK, KEHLER & McCRINK

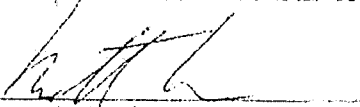
By: 
Matthew R. McCrink, Esquire

DATED: February 22, 2016

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c) and R. 4:25-4 of the New Jersey Court Rules, Matthew R. McCrink, Esquire is hereby designated as Trial Counsel for Plaintiff(s) in connection with this litigation.

McCRINK, KEHLER & McCRINK

By: 
Matthew R. McCrink, Esquire

DATED: February 22, 2016

CERTIFICATION PURSUANT TO RULES R:5-1 AND 4:6-1(d)

Pursuant to R. 4:5-1(b) of the New Jersey Court Rules, the undersigned hereby certifies that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding. No other action or arbitration proceeding is contemplated, other than, if applicable to this case, UM/TM arbitration. The undersigned does not know of the names of any other parties who should be joined in the action or who are subject to joinder.

McCRINK, KEHLER & McCRINK

By 
Matthew R. McCrink, Esquire

DATED: February 22, 2016

CERTIFICATION PURSUANT TO R. 1:38-7(b)

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)

McCRINK, KEHLER & McCRINK

By 
Matthew R. McCrink, Esquire

DATED: February 19, 2016

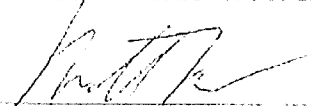
AUTOMATIC SERVICE OF UNIFORM INTERROGATORIES

Pursuant to R. 4:17-1(b)(2) DEMAND is hereby made of Defendant, for certified answers to Form C Interrogatories. All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3)

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.

McCRINK, KEHLER & McCRINK

By


Matthew R. McCrink, Esquire

DATED February 22, 2016

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to R. 4:18 of the New Jersey Court Rules, Plaintiff hereby request and demand that answering party produce at the Law Offices McCrink, Kehler & McCrink 475 Route 73 North, West Berlin, NJ 08091 the following documents and things in the time and manner provided by New Jersey Court Rules and the Discovery Instructions and Definitions set forth below:

1. True copies of all documents, materials, reports, photographs, drawings, videotapes, audio tapes, graphs, charts, statements, things affecting credibility, reproductions, surveillance, recordings, publications, learned treatises, authorities, exhibits or any other writing, object or thing that answering party will rely upon, present, offer or utilize at the time of Trial during direct examination, cross-examination or any other part of the Trial.

2. True copies of all statements, admissions or testimony, whether written, oral, tape recorded, transcribed, video taped, digitalized, transcribed, or memorialized on any other medium, made by: (a) any party to this lawsuit; (b) any agent, representative, employee or assign of any party to this lawsuit; (c) any witness named in this lawsuit; or (d) any person with knowledge of facts pertaining to the subject matter of this lawsuit.

3. True copies of the following materials from your expert witnesses, forensic examiners, investigators and independent medical examiners (each referred to herein as "said expert"):

- a. All reports rendered in this case by said expert.
- b. Updated curriculum vitae of said expert.
- c. All documents, statements, physical evidence and other things relied upon by said expert in forming an opinion.
- d. All documents, things, statements, correspondence (including letters from counsel or litigant), pleadings and other materials provided to said expert in this case whether or not same impacted on final opinion.
- e. All learned treatises, reports, statutes, codes, ordinances, rules, regulations or other published documents or authorities relied upon in forming

F. MICHAEL DAILY, JR., LLC
ATTORNEY AT LAW
216 Haddon Avenue • Sentry Office Plaza
Suite 106
Westmont, New Jersey 08108
Telephone No. [REDACTED]
Fax No. [REDACTED]
Our File #F-2362-12

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAUL SCHOELLKOPFF, : CIVIL ACTION NO.
Plaintiff, :
v. :
CRAIG HUMBLE, TOWNSHIP OF : COMPLAINT
MEDFORD, AND JOHN DOES #1 TO 10 : (Electronically Filed)
Defendant

_____ Plaintiff, by way of complaint against the defendants,
hereby avers:

PARTIES, JURISDICTION AND VENUE

1. The plaintiff, Paul Schoellkopff, is an individual who resides at 6 Aldworth Court, Medford, Burlington County, New Jersey.

2. The defendant, Township of Medford, is a governmental entity created under the laws of the State of New Jersey and maintains a principal place of business at 17 North Main Street, Medford, Burlington County, New Jersey.

3. The defendant Craig Humble, is an individual who at all times relevant to this matter was employed as a police officer by the Township of Medford.

4. Defendants, John Does #1 to 10, are individuals, whose identities are unknown at the present time, who, while employed as a police officers and supervisors by the Township of Medford, assisted, directed and/or approved the actions of defendant, Craig Humble, in the seizing, charging and incarcerating the plaintiff.

5. The aforesaid individual defendants are sued in their official and individual capacities.

6. This suit arises under the United States Constitution and the laws of the United States and is brought pursuant to 42 U.S.C. §1983, together with pendent state law claims.

7. The Court has jurisdiction over plaintiff's federal claims pursuant to 38 U.S.C. §1331, as an action arising under the Constitution of the United States, and 28 U.S.C. §1343(A)(3), to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States; and over plaintiffs pendent state law claims pursuant to 28 U.S.C. §1367.

8. Venue is properly laid pursuant to 28 U.S.C. §1391(b) in the District of New Jersey, because defendant is located in this district, and the events giving rise to the claim occurred in this district.

FACTUAL ALLEGATIONS

9. At all times relevant to this complaint, the plaintiff was the spouse of Ann Schoellkopf and prior to July 19, 2010, resided with said spouse and their 3 children at 401 Valley Forge Court, Medford, New Jersey.

10. On July 19, 2010, Ann Schoellkopf made an application under the New Jersey Law for the Prevention of Domestic Violence, N.J.S.A. 2C:25-17 *et seq.* for a temporary restraining order (hereafter, "TRO") against the plaintiff.

11. The aforesaid application was made and adjudicated without any notice to the plaintiff or an opportunity to be heard.

12. The aforesaid application was reviewed by a judge of the New Jersey Superior Court, granted and served upon the plaintiff by a Medford Police Officer at 6:30 pm on July 19, 2010.

13. The TRO entered by the court ordered Paul Schoellkopf to vacate the family home within 15 minutes.

14. The TRO entered by the court ordered Paul Schoellkopf not to have any contact with Ann Schoellkopf.

15. The TRO entered by the court ordered that Ann Schoellkopf have custody of the children.

16. The TRO entered by the court ordered that a hearing would be held on July 26, 2010 as to whether the restraints should be made permanent.

17. The TRO entered by the court did not order "support" for

Ann Schoellkopf or the children.

18. The TRO entered by the court did not order "emergent support" for Ann Schoellkopf or the dependant children.

19. Paul Schoellkopf complied with all of the aforesaid conditions contained in the TRO.

20. Notwithstanding the foregoing, on Friday, July 23, 2010 in the late evening, the defendant Craig Humble accompanied by certain of the John Does, appeared at the home of the plaintiff's parents located at 251 Amsion Road which was where the plaintiff was staying.

21. At that time, without performing any investigation and without any legal or factual basis, they arrested, handcuffed, and transported Paul Schoellkopf to the Medford Police facility.

22. At headquarters Paul Schoellkopf was accused of violating the TRO by not providing support to his spouse.

23. Specifically his was told that he had failed to provide support by closing a joint bank account.

24. In response Paul Schoellkopf demonstrated with his phone that the joint account was still open and that funds were in it.

25. Paul Schoellkopf was then told that he was being criminally charged with violating the TRO and he would be incarcerated in the Burlington County Jail until his bail was set.

26. Thereafter he was formally charged with violating N.J.S.A. 2C:29-9B by failing to provide "ongoing support (access to

money from joint bank account)" to his spouse.

27. At this time "A. G. Guidelines" promulgated by the Attorney General of New Jersey, which guidelines control the conduct of all law enforcement officers in said state, provided in regard to TRO violators that: "On weekends, holidays and other times when the court is closed, bail should be set by the designated emergent duty Superior Court judge [and that if] the defendant is unable to post bail, take appropriate steps to have the defendant incarcerated at police headquarters or the county jail."

28. Notwithstanding the foregoing the defendants failed to apply for bail while the plaintiff was in their custody.

29. The defendants then transported the plaintiff to the Burlington County Jail, where as part of the admission process he was strip searched.

30. The plaintiff was then held for 12 hours in a cell with numerous other prisoners.

31. Because no bed was available the plaintiff had to sleep on the floor.

32. Eventually bail was set in the amount of \$2,000, plaintiff's parents posted it and he was released.

33. Prior to the foregoing the plaintiff had never been arrested, placed in physical custody, or charged with any criminal or disorderly persons' offenses.

34. On July 26, 2010, a plenary hearing was held on the complaint of Ann Schoellkopf against the plaintiff.

35. At the conclusion of the hearing the court determined that allegations of domestic violence had not been substantiated and it dismissed the complaint and terminated all restraints.

36. On July 26, 2010, the aforesaid charges that had been filed by defendant, Humble, were received by the Office of the Prosecutor of Burlington County.

37. On August 18, 2010, said charges were administratively dismissed by the Prosecutor because it was beyond issue that they were baseless.

38. As a result of the aforesaid seizure and charges Paul Schoellkopf sustained pecuniary losses in the form of costs associated with his defense.

39. As a result of the aforesaid charges Paul Schoellkopf sustained non-pecuniary losses in the form of emotional distress including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and such other non-pecuniary losses as maybe disclosed in discovery.

40. The aforesaid actions of the individual defendants were willful and intentional and especially egregious.

First Count

41. The aforesaid actions of the defendants, Craig Humble and John Does #1 to 10, in seizing the person of the plaintiff and

charging the plaintiff with criminal acts when they had no probable cause to do so, constituted an unreasonable search and seizure in violation of the Fourth Amendment.

42. The aforesaid actions were approved by upper level police supervisors who were final decision makers.

43. The aforesaid actions were the result of formal and informal policies of the Medford Township that directed and encouraged such actions and which ignored applicable Attorney General Guidelines.

44. As a result of the foregoing actions of the individual defendants and the policies of the defendant Medford, the plaintiff sustained the foregoing damages.

45. Pursuant to 42 U.S.C. §1988, plaintiff is entitled to attorney's fees and expert fees in connection with the bringing of the claims alleged in this count.

Wherefore, plaintiff, demands judgement against the defendants for:

- a. Compensatory damages;
- b. Nominal damages in the event no compensatory damages are allowed;
- c. Punitive damages from the individual defendants;
- d. Costs of the action;
- e. Reasonable attorney's fees and costs; and,
- f. Such other and further relief as this Court may deem

Jury Demand

Plaintiff herewith demands a jury trial as to all issues which are triable by jury.

F. MICHAEL DAILY, JR., LLC
Attorney for the Plaintiff

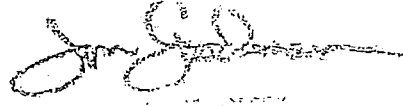
BY: *F. Michael Daily, Jr.*
F. Michael Daily, Jr.

Dated: July 22, 2012.

SUPERIOR COURT BERGEN COUNTY

FILED

FEB 13 2013



William Dunn

Name
50 Clairmont Ave. Westwood, N.J. 07675

Address

Telephone Number

William Dunn

Plaintiff

v.

Jason Deorian, Robert Romano.

Defendant (s)

Superior Court of New Jersey

Law Division Bergen County

Docket No _____
(to be filed in by the court)

**CIVIL ACTION
Complaint**

Plaintiff, William Dunn, residing at
(your name)

50 Clairmont Ave City of Westwood
(your address) (your city or town)
County of Bergen
(your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On 6/20, 2012, Jason Deorian, Robert Romano, Defendant
(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Defendant Robert Romano : Defendant Robert romano made false statements to a police officer in regards to an investigation into fraudulent electronic payments on a bank account that I was named as a owner of that account. Defendant Robert Romano made false statements to a police officer as to the sale of a motor vehicle that I suffered financial loss in which I had to pay taxes on vehicle in which there was no actual sale.

The defendant in this action resides at 113 South Plymouth Court, Southampton, N.J.,
(defendant's address)

In the County of Burlington, State Of New Jersey.

(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.
3. The harm that occurred as a result of defendant's acts include:

(list each item of damage and injury),

1. Defendant Robert Romano. In making false statements to a police officer about the fraudulent electronic payments that he made on a account that I was named on myself in which I suffered financial loss to attempt to recover the lost funds as a result of his thefts of monies from that account.
2. Defendant Robert Romano. In making false statements to a police officer in a investigation as to the fraudulent listing of sales tax on a motor vehicle of which he had no authority to do so, caused the plaintiff to suffer financial loss into paying sales tax when the vehicle transaction was basically a turning over of the title of the vehicle
3. Defendant Robert Romano. In making false statements as to my character which caused the investigation of matters to be one of bias and discrimination. By the Defendant's responses in a deposition that were false, the action caused my standing as witness in criminal charges against the defendant to be affected unjustly.

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 01/20/2013

Signature: 

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made

a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 01/20/2013

Signature: William Sund

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court *Rules* 1:8-2(b) and 4:35-1(a).

Dated: _____

Signature: _____

RECEIVED

20 MAR 25 P 12:15

CIVIL DIVISION
CASE PROCESSING

William Dunn

Name

50 Clairmont Ave. Westwood, N.J. 07675

Address

Telephone Number

William Dunn

Plaintiff

v.

Judge Charles Powers, Jr.

Defendant (s)

Superior Court of New Jersey

Law Division Bergen County

Docket No L-000085-13

(to be filled in by the court)

CIVIL ACTION

Complaint

ORDER TO SHOW
CAUSE

Plaintiff, William Dunn, residing at

(your name)

50 Clairmont Ave

(your address)

City of Westwood

(your city or town)

County of Bergen

(your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On March 22, 2013, Judge Charles Powers Jr., Defendant
(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Caused Bias With Malice, Discrimination Against A Disabled Person, Refusal And Denial
Of Medical Doctor's Diagnosis And Directive Excusing Plaintiff From Personal
Appearance As Well As Appearance By Teleconference. Defendant Powers Violated
The Civil Rights Of A Disabled Person With Malfeasance, Derogatory Statements In Total
Character Assassination Of Plaintiff. (SEE ATTACHED STATEMENT OF CLAIMS))

The defendant in this action resides at 10 Main Street, Hackensack ,
(defendant's address)

In the County of Bergen , State Of New Jersey.
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.
3. The harm that occurred as a result of defendant's acts include:

(list each item of damage and injury),

1. Defendant Powers Violated The Civil Rights Of A Disabled Person, Refusing To Accept Medical Doctor's Directive Statement Excusing The Plaintiff From In Person and Teleconference Appearance Due To Plaintiff's Medical Condition And Disability.
2. Defendant Powers Allowed And Accepted Ex Parte Communications And Correspondence From Defendant Rothmel Who Manipulated The Court Of Powers And Defendant Powers Allowed Infiltration Of The Civil Lawsuit By Allowing Powers and The Court To Be In Receipt Of Perverted Injustice Committed By The Defendant.
3. Defendant Powers Allowed And Accepted Correspondence And Motions By The Defendant Rothmel Without The Plaintiff Being Copied And In Receipt Of Motions And Correspondence.
(SEE ATTACHED STATEMENT OF LIST DETAIL OF DAMAGE AND INJURY)

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 03/23/2013 Signature: William Dunn

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made

a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 03/23/2013

Signature: William Davis

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court *Rules* 1:8-2(b) and 4:35-1(a).

Dated: 03/23/2013

Signature: William Davis

<u>William Dunn</u> _____ [Insert the plaintiff's name], Plaintiff(s), v. <u>Judge Charles E Powers</u> _____ [Insert the defendant's name], Defendant(s).	Superior Court of New Jersey Law Division Bergen County Civil Part Docket No.: L-000085-13 CIVIL ACTION ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINTS PURSUANT TO RULE 4:52
--	--

THIS MATTER being brought before the court by William Dunn, attorney for plaintiff, [insert the plaintiff's name], seeking relief by way of temporary restraints pursuant to R. 4:52, based upon the facts set forth in the verified complaint filed herewith; and it appearing that [the defendant has notice of this application] or [defendant consent's to plaintiff's application] or [immediate and irreparable damage will probably result before notice can be given and a hearing held] and for good cause shown.

It is on this ____ day of _____ ORDERED that defendant, [insert the defendant's name], appear and show cause before the Superior Court at the _____ County Courthouse in _____, New Jersey at ____ o'clock in the ____ noon or as soon thereafter as counsel can be heard, on the ____ day of _____, 20 ____ why an order should not be issued preliminarily enjoining and restraining defendant, [insert the defendant's name], from

A. [Set forth with specificity the return date relief that the plaintiff is seeking.];

B. 3/26/2013;

C. ORDER TO SHOW CAUSE MUST BE HEARD IN ANOTHER COUNTY

D. Granting such other relief as the court deems equitable and just.

And it is further ORDERED that pending the return date herein, the defendant is [temporarily] enjoined and restrained from:

A. [Set forth with specificity the temporary restraints that the plaintiff is seeking.];

Restrain & Prevent Judge Powers From Proceeding in Docket L-000085-13

- B. Recusal Of Judge Powers. _____;
- C. Civil Rights Violations Against Judge Powers. _____.

And it is further *ORDERED* that:

1. The defendant may move to dissolve or modify the temporary restraints herein contained on two (2) days notice to the [plaintiff's attorney *or alternate*: plaintiff].
2. A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendant [personally *or alternate*: describe form of substituted service] within _____ days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.
3. The plaintiff must file with the court his/her/its proof of service of the pleadings on the defendant no later than three (3) days before the return date.
4. Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by _____, 20____. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. You must send a copy of your opposition papers directly to Judge _____, whose address is _____, New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$ _____ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.
5. The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by _____, 20____. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge _____.
6. If the defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default,

provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

7. If the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

8. Defendant take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at

http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Include a \$_____ filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). 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. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

10. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than ____ days before the return date.

J.S.C.

United States District Court
District of New Jersey

Titles of Action? Redress as towards Deprivation Of Constitutional Rights

Joseph A. Miles Jr., Pro Se
Plaintiff
vs

Civil Action Number
1:10-cv-06179-MEH-RMW

Safeer Ansari, MD (Lourdes Medical Center)
Willingboro, NJ, John and Jack Doe
Medford Township Police Department,
Robert Doe (SCIP Drenk Foundation, Willingboro
NJ) Mark Doe (Lourdes Medical Center,
Willingboro, NJ)
Defendants

COMPLAINT

Plaintiff: Joseph A. Miles, Jr. Pro Se
24 Georgia Trail
Medford, New Jersey
08055

Defendants: Various, as denoted
above:
Lourdes Medical Center
Willingboro, NJ 08046

Medford Township Police Department
Medford, NJ 08055

Jurisdiction

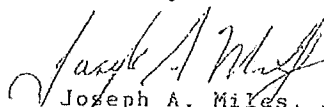
Basic provisions of the United States Constitution; to seek
redress in the Federal Courts of the United States

Cause of Action

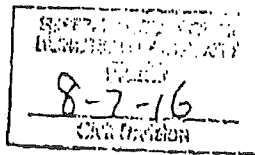
Deprivation of Plaintiff, Constitutional rights, involuntary
incarceration., Defendants acted to cause Plaintiff, s
incarceration, took custody of Plaintiff without due process
of law and with threat to cause bodily harm. John and Jack
Doe, of the Medford Police Department, were armed and a threat
to Plaintiff. Incarceration was from October 29, 2010 to
November 12, 2010; a period of 13 days.

demand

Demand for trial by Jury, with relief sought being in the amount
of \$100,000.00 in punitive damages.


Joseph A. Miles, Jr.
Plaintiff Pro Se

ZUCKER STEINBERG & WIXTED
By: Saul J. Steinberg
Attorney Id: 009271973
415 Federal Street
Camden, New Jersey 08103
[REDACTED]



SUPERIOR COURT
BURLINGTON COUNTY
2016 AUG -8 PM 3:54
RECEIVED
BY: DOS

HAYLEY STEINBERG,

Plaintiff

vs.

PHILIP D'ALANZO,

Defendants

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION
: BURLINGTON COUNTY

: DOCKET NO. L-1630-16

: Civil Action

: COMPLAINT & DEMAND FOR JURY
: TRIAL

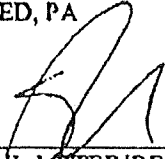
Plaintiff, Hayley Steinberg, residing at 4 Braddock's Mill Court, in the City of Medford, County of Burlington, State of New Jersey, says by way of Complaint as follows:

1. On or about August 2, 2014, Plaintiff, Hayley Steinberg, was at her residence located at 4 Braddock's Mill Court, in the City of Medford, County of Burlington, and State of New Jersey.
2. At that time, defendant, Philip D'Alonzo, was a Medford police officer who came to the residence at the request of Plaintiff's mother.
3. Plaintiff was asleep at the time defendant entered her residence, and was startled awake by the defendant.
4. At that time, defendant decided to place Plaintiff under arrest.
5. Defendant used excessive force during the arrest causing Plaintiff to sustain injuries.

WHEREFORE, Plaintiff, Hayley Steinberg, demands Judgment on this Count against the Defendant, Philip D'Alonzo,, jointly, severally or in the alternative for the following:

- a. Such damages, both compensatory and/or punitive as will reasonably compensate Plaintiff;
- b. Interest;
- c. Costs of suit;
- d. Reasonable attorney's fees as are permitted and/or authorized by the Constitutions of The United States and the State of New Jersey and/or 42 USC 1981 et seq; and
- e. Such other relief as the Court deems just and equitable.

ZUCKER STEINBERG
& WIXTED, PA

BY: 

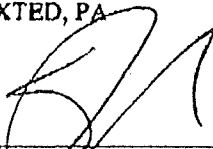
SAUL J. STEINBERG
Attorneys for Plaintiff

Dated: August 2, 2016

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff in the above-entitled action hereby demand a trial as to all issues by a jury.

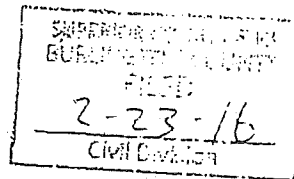
ZUCKER STEINBERG
& WIXTED, PA

BY: 

SAUL J. STEINBERG
Attorneys for Plaintiff

Dated: August 2, 2016

McCRINK, KEHLER & McCRINK
Matthew R. McCrink, Esquire
Attorney Id No. 285601972
475 Route 73 North
West Berlin, NJ 08091
Tel [REDACTED]
Fax [REDACTED]
Attorneys for Plaintiff Philip D'Alonzo



EX-100

PHILIP D'ALONZO,

Plaintiff,

v.

HAYLEY D. STEINBERG, DIANNE
STEINBERG, JOHN DOES ONE, TWO,
AND THREE

Defendants

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY, LAW DIVISION

DOCKET - L-440-16

CIVIL ACTION

COMPLAINT

Plaintiff, PHILIP D'ALONZO, (Hereinafter Plaintiff) by way of Complaint against Defendant(s), alleges as follows

FACTUAL BACKGROUND

1. At all relevant times, Plaintiff was a police officer in the township of Medford, County of Burlington, State of New Jersey when this cause of action arose. Defendants resided in the Township of Medford at 4 Braddock's Mill Court, County of Burlington, State of New Jersey.
2. On August 2, 2014, Plaintiff was brought to the home of HAYLEY D. STEINBERG and DIANNE STEINBERG regarding a request of Defendant DIANNE STEINBERG regarding problems with her daughter HAYLEY D. STEINBERG.

- 3 Defendant Dianne Steinberg directed Plaintiff to the location of her daughter knowing she was under the influence of drugs or prescription medications or alcohol, had a history of being violent, and was a danger to the officer without giving him any warning of her daughter's violent tendencies
- 4 Defendant Hayley D Steinberg when approached by Officer D'Alonzo, while she was under the influence of a controlled dangerous substance, alcohol, or other medications negligently tried to wrestle with Plaintiff inflicting injury and permanent damage to his right ear and hearing
- 5 Defendant Dianne Steinberg took no action to assist Officer D'Alonzo and allowed her daughter to wrestle with the officer without provocation or warning or intervention
- 6 The true names and or capacities, whether individual, corporate, associate or otherwise of Does 1-5, inclusive, are unknown to Plaintiffs at this time, and who therefore sue said defendant by such fictitious names. Plaintiffs are informed and believe and thereupon allege that each of the defendants fictitiously named herein as DOES are legally responsible, negligently or in some other actionable manner, for the events and happening hereinafter referred to and thereby proximately and legally caused the injuries and damages to Plaintiffs as hereinafter alleged.

FIRST COUNT
CLAIM OF NEGLIGENCE DIANNE STEINBERG

1. Plaintiff repeats the allegations of paragraphs one through six as though the same were set forth at length herein.
2. As an invitee into the home of Dianne Steinberg, Plaintiff was owed the highest duty of care as regards known dangers and threats to his welfare by defendant homeowner Dianne

Steinberg Dianne Steinberg knew of the threat her daughter posed to the Plaintiff but did not warn him of her daughter's violent nature

3 As a business invitee on Defendant's premises, Plaintiff was owed the highest duty in the care and maintenance of the premises, including the obligation to affirmatively investigate, monitor for, seek out and correct defects or conditions of which it knew or should have known upon reasonable inspection.

4 Defendant Dianne Steinberg breached her duty to Plaintiff by failing to detect, prevent, correct or cure the defective and dangerous condition her daughter represented, in that she allowed her daughter to reside in her home and consume drugs and or alcohol which posed a danger not only to her daughter Co-Defendant Hayley D Steinberg but to the infant child in her daughter's care, and innocent persons entering the home to assist defendant Dianne Steinberg, notably Plaintiff Philip D'Alonzo

5 As a direct and proximate result of Defendant's breach of duty and negligence in failing to detect, prevent, correct or cure the dangerous condition or defect, the Plaintiff sustained a serious and permanent injury to his person including but not limited to a an ear drum injury and a blunt trauma to the head causing permanent hearing loss in his right ear and tinnitus.

6 As a direct result of the aforesaid injury Plaintiff missed significant time from work was required to undergo surgery to his right ear, was charged with sick days against his accrued benefits and suffered related losses for transportation to the care facilities and medical treatment.

7 Plaintiff's injuries are significant and permanent with their complications are likely to continue permanently

WHEREFORE, Plaintiff hereby demands judgment against Defendant Dianne Steinberg for:

(a) All damages sustained and costs incurred,

- (b) Interest and costs of suit;
- (c) Reasonable attorneys' fees
- (d) Such further relief as the Court may deem equitable and just

SECOND COUNT
CLAIM OF NEGLIGENCE DEFENDANT HAYLEY D. STEINBERG

- 1 Plaintiff repeats and realleges the allegations of the first count as if set forth at length
- 2 Defendant Hayley D. Steinberg negligently caused injury to Plaintiff as a result of her lack of control of her rational faculties due to her state of intoxication or medication or drug use
- 3 Defendant Hayley D. Steinberg was otherwise careless and negligent in her contact with Plaintiff in failing to control her actions when approached by Plaintiff resulting in injury and loss to Plaintiff.

WHEREFORE PLAINTIFF DEMANDS JUDGMENT:

- (a) For all damages sustained;
- (b) For lost benefits and sick time;
- (c) For reasonable attorneys' fees and costs;
- (d) For such other relief as shall be deemed equitable and just

THIRD COUNT
CLAIM OF NEGLIGENCE JOHN DOES ONE, TWO, THREE

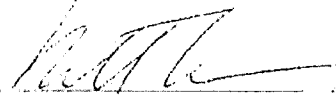
- 1 Plaintiff repeats and realleges the allegations of counts one and two as if set forth at length.
- 2 John Does one, two, and three are unknown parties who have responsibility for the care and control of defendant Hayley D. Steinberg and should have maintained the premises in such a fashion that no improper substances were available to her causing her to act irrationately and

negligently towards Officer D'Alenzo, which resulted in his injuries

WHEREFORE PLAINTIFF DEMANDS JUDGMENT

- (a) For all damages sustained;
- (b) for all lost benefits and wages;
- (c) for reasonable attorneys fees and costs;
- (d) for such other relief as the court shall deem equitable and just

McCRINK, KEHLER & McCRINK

By: 

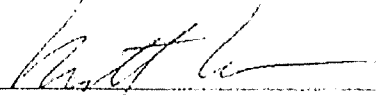
Matthew R. McCrink, Esquire

DATED February 22, 2016

JURY DEMAND

Pursuant to R. 1:8-1(b) and R. 4:35-1 of the New Jersey Court Rules, Plaintiff(s) hereby demand a trial by Jury for all issues so triable

McCRINK, KEHLER & McCRINK

By: 

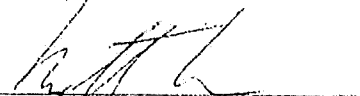
Matthew R. McCrink, Esquire

DATED: February 22, 2016

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c) and R. 4:25-4 of the New Jersey Court Rules, Matthew R. McCrink, Esquire is hereby designated as Trial Counsel for Plaintiff(s) in connection with this litigation.

McCRINK, KEHLER & McCRINK

By: 

Matthew R. McCrink, Esquire

DATED: February 22, 2016

CERTIFICATION PURSUANT TO RULES R:5-1 AND 4:6-1(d)

Pursuant to R. 4:5-1(b) of the New Jersey Court Rules, the undersigned hereby certifies that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding. No other action or arbitration proceeding is contemplated, other than, if applicable to this case, UM/UM arbitration. The undersigned does not know of the names of any other parties who should be joined in the action or who are subject to joinder.

McCRINK, KEHLER & McCRINK

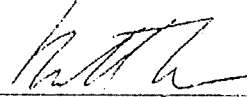
By 
Matthew R. McCrink, Esquire

DATED: February 22, 2016

CERTIFICATION PURSUANT TO R. 1:38-7(b)

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).

McCRINK, KEHLER & McCRINK

By 
Matthew R. McCrink, Esquire

DATED: February 19, 2016

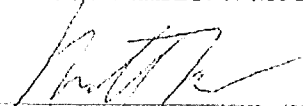
AUTOMATIC SERVICE OF UNIFORM INTERROGATORIES

Pursuant to R. 4:17-1(b)(2) DEMAND is hereby made of Defendant, for certified answers to Form C Interrogatories. All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

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.

McCRINK, KEHLER & McCRINK

By


Matthew R. McCrink, Esquire

DATED: February 22, 2016

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to R. 4:18 of the New Jersey Court Rules, Plaintiff hereby request and demand that answering party produce at the Law Offices McCrink, Kehler & McCrink 475 Route 73 North West Berlin, NJ 08091 the following documents and things in the time and manner provided by New Jersey Court Rules and the Discovery Instructions and Definitions set forth below:

1. True copies of all documents, materials, reports, photographs, drawings, videotapes, audio tapes, graphs, charts, statements, things affecting credibility, reproductions, surveillance, recordings, publications, learned treatises, authorities, exhibits or any other writing, object or thing that answering party will rely upon, present, offer or utilize at the time of Trial during direct examination, cross-examination or any other part of the Trial.

2. True copies of all statements, admissions or testimony, whether written, oral, tape recorded, transcribed, video taped, digitalized, transcribed, or memorialized on any other medium, made by: (a) any party to this lawsuit; (b) any agent, representative, employee or assign of any party to this lawsuit; (c) any witness named in this lawsuit; or (d) any person with knowledge of facts pertaining to the subject matter of this lawsuit.

3. True copies of the following materials from your expert witnesses, forensic examiners, investigators and independent medical examiners (each referred to herein as "said expert"):

- a. All reports rendered in this case by said expert.
- b. Updated curriculum vitae of said expert.
- c. All documents, statements, physical evidence and other things relied upon by said expert in forming an opinion.
- d. All documents, things, statements, correspondence (including letters from counsel or litigant), pleadings and other materials provided to said expert in this case whether or not same impacted on final opinion.
- e. All learned treatises, reports, statutes, codes, ordinances, rules, regulations or other published documents or authorities relied upon in forming

F. MICHAEL DAILY, JR., LLC
ATTORNEY AT LAW
216 Haddon Avenue • Sentry Office Plaza
Suite 106
Westmont, New Jersey 08108
Telephone No. [REDACTED]
Fax No. [REDACTED]
Our File #F-2362-12

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAUL SCHOELLKOPFF, : CIVIL ACTION NO.
Plaintiff, :
v. :
CRAIG HUMBLE, TOWNSHIP OF : COMPLAINT
MEDFORD, AND JOHN DOES #1 TO 10 : (Electronically Filed)
Defendant

____ Plaintiff, by way of complaint against the defendants,
hereby avers:

PARTIES, JURISDICTION AND VENUE

1. The plaintiff, Paul Schoellkopff, is an individual who resides at 6 Aldworth Court, Medford, Burlington County, New Jersey.

2. The defendant, Township of Medford, is a governmental entity created under the laws of the State of New Jersey and maintains a principal place of business at 17 North Main Street, Medford, Burlington County, New Jersey.

3. The defendant Craig Humble, is an individual who at all times relevant to this matter was employed as a police officer by the Township of Medford.

4. Defendants, John Does #1 to 10, are individuals, whose identities are unknown at the present time, who, while employed as a police officers and supervisors by the Township of Medford, assisted, directed and/or approved the actions of defendant, Craig Humble, in the seizing, charging and incarcerating the plaintiff.

5. The aforesaid individual defendants are sued in their official and individual capacities.

6. This suit arises under the United States Constitution and the laws of the United States and is brought pursuant to 42 U.S.C. §1983, together with pendent state law claims.

7. The Court has jurisdiction over plaintiff's federal claims pursuant to 38 U.S.C. §1331, as an action arising under the Constitution of the United States, and 28 U.S.C. §1343(A)(3), to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States; and over plaintiffs pendent state law claims pursuant to 28 U.S.C. §1367.

8. Venue is properly laid pursuant to 28 U.S.C. §1391(b) in the District of New Jersey, because defendant is located in this district, and the events giving rise to the claim occurred in this district.

FACTUAL ALLEGATIONS

9. At all times relevant to this complaint, the plaintiff was the spouse of Ann Schoellkopf and prior to July 19, 2010, resided with said spouse and their 3 children at 401 Valley Forge Court, Medford, New Jersey.

10. On July 19, 2010, Ann Schoellkopf made an application under the New Jersey Law for the Prevention of Domestic Violence, N.J.S.A. 2C:25-17 *et seq.* for a temporary restraining order (hereafter, "TRO") against the plaintiff.

11. The aforesaid application was made and adjudicated without any notice to the plaintiff or an opportunity to be heard.

12. The aforesaid application was reviewed by a judge of the New Jersey Superior Court, granted and served upon the plaintiff by a Medford Police Officer at 6:30 pm on July 19, 2010.

13. The TRO entered by the court ordered Paul Schoellkopf to vacate the family home within 15 minutes.

14. The TRO entered by the court ordered Paul Schoellkopf not to have any contact with Ann Schoellkopf.

15. The TRO entered by the court ordered that Ann Schoellkopf have custody of the children.

16. The TRO entered by the court ordered that a hearing would be held on July 26, 2010 as to whether the restraints should be made permanent.

17. The TRO entered by the court did not order "support" for

Ann Schoellkopf or the children.

18. The TRO entered by the court did not order "emergent support" for Ann Schoellkopf or the dependant children.

19. Paul Schoellkopf complied with all of the aforesaid conditions contained in the TRO.

20. Notwithstanding the foregoing, on Friday, July 23, 2010 in the late evening, the defendant Craig Humble accompanied by certain of the John Does, appeared at the home of the plaintiff's parents located at 251 Aulsion Road which was where the plaintiff was staying.

21. At that time, without performing any investigation and without any legal or factual basis, they arrested, handcuffed, and transported Paul Schoellkopf to the Medford Police facility.

22. At headquarters Paul Schoellkopf was accused of violating the TRO by not providing support to his spouse.

23. Specifically his was told that he had failed to provide support by closing a joint bank account.

24. In response Paul Schoellkopf demonstrated with his phone that the joint account was still open and that funds were in it.

25. Paul Schoellkopf was then told that he was being criminally charged with violating the TRO and he would be incarcerated in the Burlington County Jail until his bail was set.

26. Thereafter he was formally charged with violating N.J.S.A. 2C:29-9B by failing to provide "ongoing support (access to

money from joint bank account)" to his spouse.

27. At this time "A. G. Guidelines" promulgated by the Attorney General of New Jersey, which guidelines control the conduct of all law enforcement officers in said state, provided in regard to TRO violators that: "On weekends, holidays and other times when the court is closed, bail should be set by the designated emergent duty Superior Court judge [and that if] the defendant is unable to post bail, take appropriate steps to have the defendant incarcerated at police headquarters or the county jail."

28. Notwithstanding the foregoing the defendants failed to apply for bail while the plaintiff was in their custody.

29. The defendants then transported the plaintiff to the Burlington County Jail, where as part of the admission process he was strip searched.

30. The plaintiff was then held for 12 hours in a cell with numerous other prisoners.

31. Because no bed was available the plaintiff had to sleep on the floor.

32. Eventually bail was set in the amount of \$2,000, plaintiff's parents posted it and he was released.

33. Prior to the foregoing the plaintiff had never been arrested, placed in physical custody, or charged with any criminal or disorderly persons' offenses.

34. On July 26, 2010, a plenary hearing was held on the complaint of Ann Schoellkopf against the plaintiff.

35. At the conclusion of the hearing the court determined that allegations of domestic violence had not been substantiated and it dismissed the complaint and terminated all restraints.

36. On July 26, 2010, the aforesaid charges that had been filed by defendant, Humble, were received by the Office of the Prosecutor of Burlington County.

37. On August 18, 2010, said charges were administratively dismissed by the Prosecutor because it was beyond issue that they were baseless.

38. As a result of the aforesaid seizure and charges Paul Schoellkopf sustained pecuniary losses in the form of costs associated with his defense.

39. As a result of the aforesaid charges Paul Schoellkopf sustained non-pecuniary losses in the form of emotional distress including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and such other non-pecuniary losses as maybe disclosed in discovery.

40. The aforesaid actions of the individual defendants were willful and intentional and especially egregious.

First Count

41. The aforesaid actions of the defendants, Craig Humble and John Does #1 to 10, in seizing the person of the plaintiff and

charging the plaintiff with criminal acts when they had no probable cause to do so, constituted an unreasonable search and seizure in violation of the Fourth Amendment.

42. The aforesaid actions were approved by upper level police supervisors who were final decision makers.

43. The aforesaid actions were the result of formal and informal policies of the Medford Township that directed and encouraged such actions and which ignored applicable Attorney General Guidelines.

44. As a result of the foregoing actions of the individual defendants and the policies of the defendant Medford, the plaintiff sustained the foregoing damages.

45. Pursuant to 42 U.S.C. §1988, plaintiff is entitled to attorney's fees and expert fees in connection with the bringing of the claims alleged in this count.

Wherefore, plaintiff, demands judgement against the defendants for:

- a. Compensatory damages;
- b. Nominal damages in the event no compensatory damages are allowed;
- c. Punitive damages from the individual defendants;
- d. Costs of the action;
- e. Reasonable attorney's fees and costs; and,
- f. Such other and further relief as this Court may deem

Jury Demand

Plaintiff herewith demands a jury trial as to all issues which are triable by jury.

F. MICHAEL DAILY, JR., LLC
Attorney for the Plaintiff

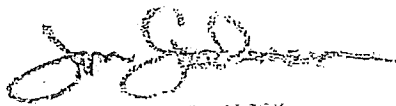
BY: *F. Michael Daily, Jr.*
F. Michael Daily, Jr.

Dated: July 22, 2012.

SUPERIOR COURT BERGEN COUNTY

FILED

FEB 14 2013



William Dunn

Name
50 Clairmont Ave. Westwood, N.J. 07675

Address

Telephone Number

William Dunn

Plaintiff

v.

Jason Deorian, Robert Romano.

Defendant (s)

Superior Court of New Jersey

Law Division Bergen County

Docket No _____
(to be filled in by the court)

**CIVIL ACTION
Complaint**

Plaintiff, William Dunn, residing at
(your name)

50 Clairmont Ave City of Westwood
(your address) (your city or town)
County of Bergen
(your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On 6/20, 2012, Jason Deorian, Robert Romano, Defendant
(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Defendant Robert Romano : Defendant Robert romano made false statements to a police officer in regards to an investigation into fraudulent electronic payments on a bank account that I was named as a owner of that account. Defendant Robert Romano made false statements to a police officer as to the sale of a motor vehicle that I suffered financial loss in which I had to pay taxes on vehicle in which there was no actual sale.

The defendant in this action resides at 113 South Plymouth Court, Southampton, N.J.,
(defendant's address)

In the County of Burlington, State Of New Jersey.
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.
3. The harm that occurred as a result of defendant's acts include:

(list each item of damage and injury),

1. Defendant Robert Romano. In making false statements to a police officer about the fraudulent electronic payments that he made on a account that I was named on myself in which I suffered financial loss to attempt to recover the lost funds as a result of his thefts of monies from that account.
2. Defendant Robert Romano. In making false statements to a police officer in a investigation as to the fraudulent listing of sales tax on a motor vehicle of which he had no authority to do so, caused the plaintiff to suffer financial loss into paying sales tax when the vehicle transaction was basically a turning over of the title of the vehicle
3. Defendant Robert Romano. In making false statements as to my charactar which caused the investigation of matters to be one of bias and discrimination. By the Defendant's responses in a deposition that were false, the action caused my standing as witness in criminal charges against the defendant to be affected un justly.

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 01/20/2013

Signature: William Dine

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made

a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 01/20/2013

Signature: William Sund

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court *Rules* 1:8-2(b) and 4:35-1(a).

Dated: _____ Signature: _____

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CIVIL DIVISION
CASE PROCESSING

William Dunn

Name

50 Clairmont Ave. Westwood, N.J. 07675

Address

Telephone Number

William Dunn

Plaintiff

v.

Judge Charles Powers, Jr.

Defendant (s)

Superior Court of New Jersey

Law Division Bergen County

Docket No L-000085-13

(to be filled in by the court)

CIVIL ACTION

Complaint

ORDER TO SHOW
CAUSE

Plaintiff, William Dunn, residing at

(your name)

50 Clairmont Ave

(your address)

City of Westwood

(your city or town)

County of Bergen

(your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On March 22, 2013, Judge Charles Powers Jr., Defendant
(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Caused Bias With Malice, Discrimination Against A Disabled Person, Refusal And Denial
Of Medical Doctor's Diagnosis And Directive Excusing Plaintiff From Personal
Appearance As Well As Appearance By Teleconference. Defendant Powers Violated
The Civil Rights Of A Disabled Person With Malfeasance, Derogatory Statements In Total
Character Assassination Of Plaintiff. (SEE ATTACHED STATEMENT OF CLAIMS))

The defendant in this action resides at 10 Main Street, Hackensack,
(defendant's address)

In the County of Bergen, State Of New Jersey.
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.
3. The harm that occurred as a result of defendant's acts include:

(list each item of damage and injury),

1. Defendant Powers Violated The Civil Rights Of A Disabled Person, Refusing To Accept Medical Doctor's Directive Statement Excusing The Plaintiff From In Person and Teleconference Appearance Due To Plaintiff's Medical Condition And Disability.
2. Defendant Powers Allowed And Accepted Ex Parte Communications And Correspondence From Defendant Rothmel Who Manipulated The Court Of Powers And Defendant Powers Allowed Infiltration Of The Civil Lawsuit By Allowing Powers and The Court To Be In Receipt Of Perverted Injustice Committed By The Defendant.
3. Defendant Powers Allowed And Accepted Correspondence And Motions By The Defendant Rothmel Without The Plaintiff Being Copied And In Receipt Of Motions And Correspondence.
(SEE ATTACHED STATEMENT OF LIST DETAIL OF DAMAGE AND INJURY)

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 03/23/2013 Signature: William Dunn

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made

a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 03/23/2013

Signature: William Dowd

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court *Rules* 1:8-2(b) and 4:35-1(a).

Dated: 03/23/2013

Signature: William Dowd

<u>William Dunn</u> , [Insert the plaintiff's name], Plaintiff(s), v. <u>Judge Charles E Powers</u> , [Insert the defendant's name], Defendant(s).	Superior Court of New Jersey Law Division Bergen County Civil Part Docket No.: L-000085-13 CIVIL ACTION ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINTS PURSUANT TO RULE 4:52
--	--

THIS MATTER being brought before the court by William Dunn, attorney for plaintiff, [insert the plaintiff's name], seeking relief by way of temporary restraints pursuant to R. 4:52, based upon the facts set forth in the verified complaint filed herewith; and it appearing that [the defendant has notice of this application] or [defendant consent's to plaintiff's application] or [immediate and irreparable damage will probably result before notice can be given and a hearing held] and for good cause shown.

It is on this ____ day of _____ ORDERED that defendant, [insert the defendant's name], appear and show cause before the Superior Court at the _____ County Courthouse in _____, New Jersey at ____ o'clock in the ____ noon or as soon thereafter as counsel can be heard, on the ____ day of _____, 20 __ why an order should not be issued preliminarily enjoining and restraining defendant, [insert the defendant's name], from

A. [Set forth with specificity the return date relief that the plaintiff is seeking.];

B. 3/26/2013;

C. ORDER TO SHOW CAUSE MUST BE HEARD IN Another County

D. Granting such other relief as the court deems equitable and just.

And it is further ORDERED that pending the return date herein, the defendant is [temporarily] enjoined and restrained from:

A. [Set forth with specificity the temporary restraints that the plaintiff is seeking.];

Restrain & Prevent Judge Powers From Proceeding in Docket L-000085-13

- B. Recusal Of Judge Powers.;
C. Civil Rights Violations Against Judge Powers.

And it is further *ORDERED* that:

1. The defendant may move to dissolve or modify the temporary restraints herein contained on two (2) days notice to the [plaintiff's attorney *or alternate*: plaintiff].
2. A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendant [personally *or alternate*: describe form of substituted service] within ____ days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.
3. The plaintiff must file with the court his/her/its proof of service of the pleadings on the defendant no later than three (3) days before the return date.
4. Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by ____, 20__. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. You must send a copy of your opposition papers directly to Judge ____, whose address is ____, New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$ ____ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.
5. The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by ____, 20__. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge ____.
6. If the defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default,

provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

7. If the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

8. Defendant take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at

http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Include a \$ _____ filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). 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. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

10. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than ____ days before the return date.

J.S.C.

United States District Court
District of New Jersey

Titles of Action: Redress as towards Deprivation Of Constitutional Rights

Joseph A. Miles Jr., Pro Se
Plaintiff
vs

Civil Action Number
1:10-cv-06179-NJH-KMW

Safeer Ansari, MD (Lourdes Medical Center)
Willingboro, NJ, John and Jack Doe
Medford Township Police Department,
Robert Doe (SCIP Drenk Foundation, Willingboro
NJ) Mark Doe (Lourdes Medical Center,
Willingboro, NJ)
Defendants

COMPLAINT

Plaintiff: Joseph A. Miles, Jr. Pro Se
24 Georgia Trail
Medford, New Jersey
08055

Defendants: Various, as denoted
above:
Lourdes Medical Center
Willingboro, NJ 08046

Medford Township Police Department
Medford, NJ 08055

Jurisdiction

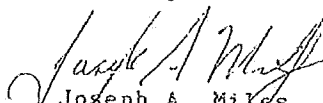
Basic provisions of the United States Constitution; to seek redress in the Federal Courts of the United States

Cause of Action

Deprivation of Plaintiff's Constitutional rights, involuntary incarceration., Defendants acted to cause Plaintiff's incarceration, took custody of Plaintiff without due process of law and with threat to cause bodily harm. John and Jack Doe, of the Medford Police Department, were armed and a threat to Plaintiff. Incarceration was from October 29, 2010 to November 12, 2010; a period of 13 days.

demand

Demand for trial by Jury, with relief sought being in the amount of \$100,000.00 in punitive damages.


Joseph A. Miles, Jr.
Plaintiff Pro Se

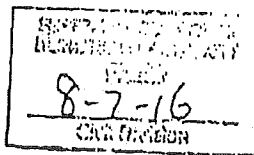
ZUCKER STEINBERG & WIXTED

By: Saul J. Steinberg

Attorney Id: 009271973

415 Federal Street

Camden, New Jersey 08103



SUPERIOR COURT
BURLINGTON COUNTY
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BY: DCS

HAYLEY STEINBERG,

Plaintiff

vs.

PHILIP D'ALONZO,

Defendants

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
BURLINGTON COUNTY

DOCKET NO. L-1630-16

Civil Action

COMPLAINT & DEMAND FOR JURY
TRIAL

Plaintiff, Hayley Steinberg, residing at 4 Braddock's Mill Court, in the City of Medford, County of Burlington, State of New Jersey, says by way of Complaint as follows:

1. On or about August 2, 2014, Plaintiff, Hayley Steinberg, was at her residence located at 4 Braddock's Mill Court, in the City of Medford, County of Burlington, and State of New Jersey.
2. At that time, defendant, Philip D'Alonzo, was a Medford police officer who came to the residence at the request of Plaintiff's mother.
3. Plaintiff was asleep at the time defendant entered her residence, and was startled awake by the defendant.
4. At that time, defendant decided to place Plaintiff under arrest.
5. Defendant used excessive force during the arrest causing Plaintiff to sustain injuries.

WHEREFORE, Plaintiff, Hayley Steinberg, demands Judgment on this Count against the Defendant, Philip D'Alonzo,, jointly, severally or in the alternative for the following:

- a. Such damages, both compensatory and/or punitive as will reasonably compensate Plaintiff;
- b. Interest;
- c. Costs of suit;
- d. Reasonable attorney's fees as are permitted and/or authorized by the Constitutions of The United States and the State of New Jersey and/or 42 USC 1981 et seq; and
- e. Such other relief as the Court deems just and equitable.

ZUCKER STEINBERG
& WIXTED, PA

BY: _____

SAUL J. STEINBERG
Attorneys for Plaintiff

Dated: August 2, 2016

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff in the above-entitled action hereby demand a trial as to all issues by a jury.

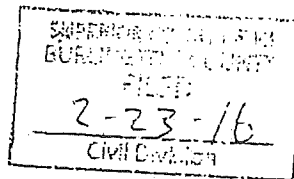
ZUCKER STEINBERG
& WIXTED, PA

BY: _____

SAUL J. STEINBERG
Attorneys for Plaintiff

Dated: August 2, 2016

McCRINK, KEHLER & McCRINK
Matthew R. McCrink, Esquire
Attorney Id No.: 285601972
475 Route 73 North
West Berlin, NJ 08091
Tel: [REDACTED]
Fax: [REDACTED]
Attorneys for Plaintiff Philip D'Alonzo



RECEIVED
EVL 08

PHILIP D'ALONZO,

Plaintiff,

v.

HAYLEY D. STEINBERG, DIANNE
STEINBERG, JOHN DOES ONE, TWO,
AND THREE

Defendants

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY, LAW DIVISION

DOCKET - L-440-16

CIVIL ACTION

COMPLAINT

Plaintiff, PHILIP D'ALONZO, (Hereinafter Plaintiff) by way of Complaint against Defendant(s), alleges as follows

FACTUAL BACKGROUND

1. At all relevant times, Plaintiff was a police officer in the township of Medford, County of Burlington, State of New Jersey when this cause of action arose. Defendants resided in the Township of Medford at 4 Braddock's Mill Court, County of Burlington, State of New Jersey.
2. On August 2, 2014, Plaintiff was brought to the home of HAYLEY D. STEINBERG and DIANNE STEINBERG regarding a request of Defendant DIANNE STEINBERG regarding problems with her daughter HAYLEY D. STEINBERG.

- 3 Defendant Dianne Steinberg directed Plaintiff to the location of her daughter knowing she was under the influence of drugs or prescription medications or alcohol, had a history of being violent, and was a danger to the officer without giving him any warning of her daughter's violent tendencies
- 4 Defendant Hayley D Steinberg when approached by Officer D'Alonzo, while she was under the influence of a controlled dangerous substance, alcohol, or other medications negligently tried to wrestle with Plaintiff inflicting injury and permanent damage to his right ear and hearing
- 5 Defendant Dianne Steinberg took no action to assist Officer D'Alonzo and allowed her daughter to wrestle with the officer without provocation or warning or intervention
- 6 The true names and capacities, whether individual, corporate, associate or otherwise of Does 1-5, inclusive, are unknown to Plaintiffs at this time, and who therefore sue said defendant by such fictitious names. Plaintiffs are informed and believe and thereupon allege that each of the defendants fictitiously named herein as DOES are legally responsible, negligently or in some other actionable manner, for the events and happening hereinafter referred to and thereby proximately and legally caused the injuries and damages to Plaintiffs as hereinafter alleged.

FIRST COUNT
CLAIM OF NEGLIGENCE DIANNE STEINBERG

1. Plaintiff repeats the allegations of paragraphs one through six as though the same were set forth at length herein.
2. As an invitee into the home of Dianne Steinberg, Plaintiff was owed the highest duty of care as regards known dangers and threats to his welfare by defendant homeowner Dianne

Steinberg Dianne Steinberg knew of the threat her daughter posed to the Plaintiff but did not warn him of her daughter's violent nature

3 As a business invitee on Defendant's premises, Plaintiff was owed the highest duty in the care and maintenance of the premises, including the obligation to affirmatively investigate, monitor for, seek out and correct defects or conditions of which it knew or should have known upon reasonable inspection.

4 Defendant Dianne Steinberg breached her duty to Plaintiff by failing to detect, prevent, correct or cure the defective and dangerous condition her daughter represented, in that she allowed her daughter to reside in her home and consume drugs and or alcohol which posed a danger not only to her daughter Co-Defendant Hayley D. Steinberg but to the infant child in her daughter's care, and innocent persons entering the home to assist defendant Dianne Steinberg, notably Plaintiff Philip D'Alonzo

5 As a direct and proximate result of Defendant's breach of duty and negligence in failing to detect, prevent, correct or cure the dangerous condition or defect, the Plaintiff sustained a serious and permanent injury to his person including but not limited to a an ear drum injury and a blunt trauma to the head causing permanent hearing loss in his right ear and tinnitus.

6 As a direct result of the aforesaid injury Plaintiff missed significant time from work was required to undergo surgery to his right ear, was charged with sick days against his accrued benefits and suffered related losses for transportation to the care facilities and medical treatment.

7 Plaintiff's injuries are significant and permanent with their complications are likely to continue permanently

WHEREFORE, Plaintiff hereby demands judgment against Defendant Dianne Steinberg for

(a) All damages sustained and costs incurred,

- (b) Interest and costs of suit;
- (c) Reasonable attorneys' fees
- (d) Such further relief as the Court may deem equitable and just

SECOND COUNT
CLAIM OF NEGLIGENCE DEFENDANT HAYLEY D. STEINBERG

- 1 Plaintiff repeats and realleges the allegations of the first count as if set forth at length
- 2 Defendant Hayley D. Steinberg negligently caused injury to Plaintiff as a result of her lack of control of her rational faculties due to her state of intoxication or medication or drug use
- 3 Defendant Hayley D. Steinberg was otherwise careless and negligent in her contact with Plaintiff in failing to control her actions when approached by Plaintiff resulting in injury and loss to Plaintiff.

WHEREFORE PLAINTIFF DEMANDS JUDGMENT:

- (a) For all damages sustained;
- (b) For lost benefits and sick time;
- (c) For reasonable attorneys' fees and costs;
- (d) For such other relief as shall be deemed equitable and just

THIRD COUNT
CLAIM OF NEGLIGENCE JOHN DOES ONE, TWO, THREE

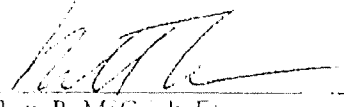
- 1 Plaintiff repeats and realleges the allegations of counts one and two as if set forth at length.
- 2 John Does one, two, and three are unknown parties who have responsibility for the care and control of defendant Hayley D. Steinberg and should have maintained the premises in such a fashion that no improper substances were available to her causing her to act irrationately and

negligently towards Officer D'Alonzo, which resulted in his injuries

WHEREFORE PLAINTIFF DEMANDS JUDGMENT

- (a) For all damages sustained,
- (b) for all lost benefits and wages,
- (c) for reasonable attorneys fees and costs,
- (d) for such other relief as the court shall deem equitable and just

McCRINK, KEHLER & McCRINK

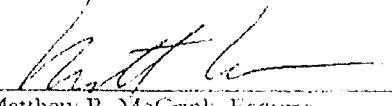
By: 
Matthew R. McCrink, Esquire

DATED February 22, 2016

JURY DEMAND

Pursuant to R. 1:8-1(b) and R. 4:35-1 of the New Jersey Court Rules, Plaintiff(s) hereby demand a trial by Jury for all issues so triable

McCRINK, KEHLER & McCRINK

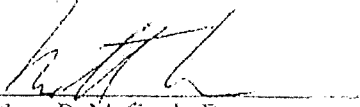
By: 
Matthew R. McCrink, Esquire

DATED: February 22, 2016

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c) and R. 4:25-4 of the New Jersey Court Rules, Matthew R. McCrink, Esquire is hereby designated as Trial Counsel for Plaintiff(s) in connection with this litigation.

McCRINK, KEHLER & McCRINK

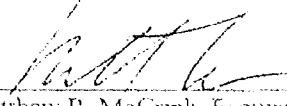
By: 
Matthew R. McCrink, Esquire

DATED: February 22, 2016

CERTIFICATION PURSUANT TO RULES R:5-1 AND 4:6-1(d)

Pursuant to R. 4:5-1(b) of the New Jersey Court Rules, the undersigned hereby certifies that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding. No other action or arbitration proceeding is contemplated, other than, if applicable to this case, UM/UM arbitration. The undersigned does not know of the names of any other parties who should be joined in the action or who are subject to joinder.

McCRINK, KEHLER & McCRINK

By 

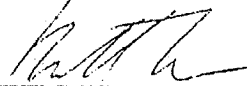
Matthew R. McCrink, Esquire

DATED: February 22, 2016

CERTIFICATION PURSUANT TO R. 1:38-7(b)

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).

McCRINK, KEHLER & McCRINK

By 

Matthew R. McCrink, Esquire

DATED: February 19, 2016

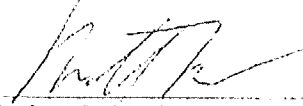
AUTOMATIC SERVICE OF UNIFORM INTERROGATORIES

Pursuant to R. 4:17-1(b)(2) DEMAND is hereby made of Defendant, for certified answers to Form C Interrogatories. All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

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.

McCRINK, KEHLER & McCRINK

By


Matthew R. McCrink, Esquire

DATED: February 22, 2010

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to R. 4:18 of the New Jersey Court Rules, Plaintiff hereby request and demand that answering party produce at the Law Offices McCrink, Kehler & McCrink 475 Route 73 North West Berlin, NJ 08091 the following documents and things in the time and manner provided by New Jersey Court Rules and the Discovery Instructions and Definitions set forth below:

1. True copies of all documents, materials, reports, photographs, drawings, videotapes, audio tapes, graphs, charts, statements, things affecting credibility, reproductions, surveillance, recordings, publications, learned treatises, authorities, exhibits or any other writing, object or thing that answering party will rely upon, present, offer or utilize at the time of Trial during direct examination, cross-examination or any other part of the Trial.

2. True copies of all statements, admissions or testimony, whether written, oral, tape recorded, transcribed, video taped, digitalized, transcribed, or memorialized on any other medium, made by: (a) any party to this lawsuit; (b) any agent, representative, employee or assign of any party to this lawsuit; (c) any witness named in this lawsuit; or (d) any person with knowledge of facts pertaining to the subject matter of this lawsuit.

3. True copies of the following materials from your expert witnesses, forensic examiners, investigators and independent medical examiners (each referred to herein as "said expert"):

- a. All reports rendered in this case by said expert.
- b. Updated curriculum vitae of said expert.
- c. All documents, statements, physical evidence and other things relied upon by said expert in forming an opinion.
- d. All documents, things, statements, correspondence (including letters from counsel or litigant), pleadings and other materials provided to said expert in this case whether or not same impacted on final opinion.
- e. All learned treatises, reports, statutes, codes, ordinances, rules, regulations or other published documents or authorities relied upon in forming