

SUMMONS

Attorney(s) Jeffrey D. Catrambone, Esq.
Office Address 1130 Clifton Ave
Town, State, Zip Code Clifton, NJ 07013

Telephone Number (973) 242-2442
Attorney(s) for Plaintiff Robert Wysokowski,

Superior Court of New Jersey

mor COUNTY

Civil DIVISION

Docket No: MRS-L-1324-14

Plaintiff(s)

Vs.

Township of Mendham & Township of Mendham Police
Department
Defendant(s)

CIVIL ACTION SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court 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.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

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

If you cannot afford an attorney, you may call the Legal Services office in the county where you live 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.

121
Clerk of the Superior Court

DATED: 05/30/2013

Name of Defendant to Be Served: Township of Mendham

Address of Defendant to Be Served: Attn: Kathleen Potter, Clerk
2 West Main Street, Brookside, NJ 07926

SCIARRA & CATRAMBONE, L.L.C.
Jeffrey D. Catrambone, Esq.
Atty ID # 024491996
1130 Clifton Avenue
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Attorney for Plaintiff
Robert Wysokowski

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2014 MAY 23 P 3:31
MORRIS COUNTY
CIVIL DIVISION

ROBERT WYSOKOWSKI,

Plaintiff,

vs.

TOWNSHIP OF MENDHAM &
TOWNSHIP OF MENDHAM POLICE
DEPARTMENT,

Defendants.

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

: CIVIL ACTION

: DOCKET NO.: MRS-L- 1324 -14

: COMPLAINT & JURY DEMAND

Plaintiff Robert Wysokowski ("Plaintiff"), by and through his attorneys, Law Offices of Sciarra & Catrambone, LLC, as and for a Complaint, alleges as follows:

PRELIMINARY STATEMENT

1. This is an action brought by Plaintiff against his employers, the Township of Mendham ("the Township") and the Mendham Township Police Department ("the Department"), ("Defendants", collectively). Plaintiff seeks judgment of this Court against Defendants for relief permitted under the Conscientious Employee Protection Act, N.J.S.A. 34:19-1 et seq. ("CEPA").

PARTIES

2. Plaintiff is an employee of Defendants within the meaning of CEPA.
3. At all times relevant to this Complaint, Defendants are/were employers within the meaning of CEPA.
4. Defendant Township of Mendham is a political sub-division, and a public entity located in the County of Morris, State of New Jersey.

JURISDICTION

5. Jurisdiction is properly laid in this Court in that Defendants are subject to the personal jurisdiction in the State of New Jersey, County of Morris, and the events giving rise to this Complaint occurred in Morris County, New Jersey.

STATEMENT OF FACTS

6. Defendants currently employ Plaintiff as a Police Officer in the Township of Mendham's Police Department.
7. Plaintiff has been employed by Defendants since in or about September 1998 as a Police Officer. Prior to assuming his duties, he attended and completed his required training at the Monmouth County Police Academy.
8. Plaintiff holds Associate's Degrees from Mercer County Community College in the areas of criminal justice and special education, a Bachelor's Degree from Monmouth University in Criminal Justice, and a Master's Degree from Seton Hall

University in Human Resources.

9. Plaintiff, at all times during his employment with Defendant, has performed his duties in a competent, thorough manner. He has no history of any major discipline.
10. In an evaluation for the period of July 1999 through December 1999, Defendants indicated that Plaintiff "has demonstrated that he has above average initiative for police work. Motor vehicle enforcement and public contacts are his strongest points".
11. In his evaluation for the period of January 2001 through June 2001, Defendants indicated that Plaintiff "is among the highest in traffic stops and summonses".
12. Throughout his career, Plaintiff consistently met the Department's standards with regard to his performance as a police officer, including but not limited to enforcement of motor vehicle laws, executing warrants and effectuating arrests.
13. Notwithstanding the above, on or about February 8, 2005, the Chief of the Department at the time, Thomas Costanza, added the following statement to Plaintiff's most recent performance evaluation, which Plaintiff had already reviewed with his Sergeant and signed: "[Patrolman] Wysokowski, while working 3 months during this period is under the acceptable level of initiated arrests. If he had worked the entire 6 months it is possible he may have risen to acceptable standards."
14. Plaintiff then asked Chief Costanza what an acceptable level

of arrests was. The Chief responded merely that Plaintiff "had to increase his numbers," or words to that effect. Nonetheless, Plaintiff had better statistics than other officers in the Department, including two Sergeants, Anthony Fondaco and Vito Abrusci.

15. Plaintiff's then-Sergeant, Steven Crawford, who is currently the Chief of the Department, advised Plaintiff that he should seek out and target younger drivers for motor vehicle stops. Plaintiff objected to this practice, and advised Crawford that it constituted illegal profiling. Crawford told Plaintiff that it "was good police work," or words to that effect.
16. During the course of 2005, Plaintiff stated his objections to the Department's awards program, specifically that it provided an incentive to officers to profile motorists and to effectuate motor vehicle stops and arrests without probable cause. Under the program, officers within the Department would receive an honorable service medal or meritorious service medal for effectuating ten (10) DWI arrests leading to a conviction and five (5) felony arrests, or for fifteen (15) DWI convictions. Additionally, officers who lead the Department in arrests or motor vehicle summonses issued would receive twelve (12) hours of compensatory time.
17. Then-Sergeant Crawford advised Plaintiff to pull over any car with a group of younger drivers / passengers who appeared to be in their late teens or early twenties. Crawford went so far as to suggest to Plaintiff that he should look for

vehicles with a Morris County College parking permit or other identifier and to stop that vehicle.

18. Crawford suggested to Plaintiff that every vehicle has a violation, and that one could be found after a stop was effectuated, which is contrary to the laws of New Jersey regarding probable cause for motor vehicle stops by police officers. Plaintiff advised Crawford that he refused to engage in this illegal practice.
19. Crawford also instructed officers within the Department to follow a car with a group of younger drivers and passengers and wait for the vehicle to engage in a motor vehicle violation. Plaintiff likewise told Crawford that he refused to engage in this practice as illegal profiling.
20. When Crawford became aware of Plaintiff's statements, he advised Plaintiff on more than one occasion to "keep [his] mouth shut and do [his] job," or words to that effect.
21. In or about September 2005, Plaintiff had one of his conversations with Crawford wherein he expressed his concerns about and refused to participate in the practice of targeting and profiling younger drivers.
22. Within a week of that conversation, Defendants issued a written reprimand against Plaintiff for purportedly leaving the headlights of a police vehicle on and draining the battery. Defendants had never written up similarly situated officers for such a violation. Plaintiff challenged the reprimand, by way of Lieutenant James Hughes of the

Department. On or about September 27, 2005, the reprimand was removed from Plaintiff's personnel file maintained by Defendants.

23. On or about May 10, 2006, Defendants appointed an officer junior to Plaintiff to be an Acting Sergeant, even though the Department's past practice had been to appoint the most senior officer to that position.
24. On or about September 13, 2006, Plaintiff received his semi-annual performance evaluation. Sergeant Fandaco of the Department rated Plaintiff as "acceptable" in the categories of arrests and motor vehicle stops. However, Crawford designated Plaintiff as "unacceptable" in those areas.
25. Plaintiff grieved that evaluation on or about September 13, 2006 to the Township Administrator, Steve Mountain. Plaintiff advised Mountain that the Department had an illegal quota system in place and that Chief Costanza and Sergeant Crawford were targeting Plaintiff for complaining about and refusing to participate in Defendants' illegal profiling practices.
26. In response, Chief Costanza admonished Plaintiff that "if [Plaintiff] ever went outside the chain of command again, [Costanza] would suspend him for 20 days," or words to that effect.
27. For the evaluation period from July 2006 through December 2006, then-Sergeant Crawford designated Plaintiff as "unacceptable" in the areas of motor vehicle stops and motor vehicle enforcement initiative, even though Plaintiff's

numbers were similar to those exhibited earlier in his career prior to his whistle-blowing activity. Plaintiff continually met or exceeded those standards during his career.

28. On or about June 15, 2007, Defendants issued a written reprimand against Plaintiff for allegedly failing to supervise a junior officer, Patrolman Jason Ferreira, who was favored by the Chief.
29. Previously, on or about March 20, 2007, Plaintiff had criticized Ferreira for unnecessarily conducting a motor vehicle stop with his police firearm drawn. After the incident, then-Sergeant Crawford directed Plaintiff to "leave him alone," or words to that effect, referring to Ferreira.
30. On or about November 16, 2007, Sergeant Crawford issued an order to Plaintiff questioning why Plaintiff had not met the Department's "quota" of issuing twenty (20) motor vehicle summonses per month. Notwithstanding the illegality of such a "quota", Plaintiff had worked eight (8) shifts that month and had written thirteen (13) motor vehicle summonses, which exceeded the Department's "standard" of officers issuing one summons per shift.
31. On or about January 16, 2008, Defendants issued a written reprimand upon Plaintiff again for allegedly failing to meet the Department's "quota" for motor vehicle summonses for December 2007, even though Plaintiff had issued twenty-one (21) summonses in fifteen (15) work days. Defendants then falsely advised that Plaintiff had written eleven (11)

summonses in error, and subsequently removed the street signs and took out of the ordinance book the ordinances, upon which Plaintiff legally based those summonses.

32. During an evaluation in 2008, Defendants rated Plaintiff as "needs improvement" regarding arrests, but "superior" in performance of departmental responsibilities and contact with the public.
33. In or about 2009, Costanza retired from the Department and Defendants promoted Crawford to Chief. In his first evaluation after Costanza retired, Plaintiff received an extremely positive evaluation from his new Sergeant, Ross Johnson.
34. On or about April 18, 2010, Plaintiff was ill and called out sick from his shift in accordance with the Department's existing procedures. On that date, Sergeant Steven Bittman of the Department, per Chief Crawford's directive, appeared at Plaintiff's home to purportedly make sure he was home. The Department had never engaged in such a practice.
35. When Plaintiff returned to duty, Defendants implemented a new sick leave policy authorizing Sergeants to perform random home visits / checks upon officers who had called out sick. This purported policy was noticed the day after Plaintiff called out sick but supposedly went into effect the day before.
36. On or about August 27, 2010, Defendants announced a promotional process. Plaintiff engaged in that process, seeking to be promoted to the rank of Sergeant and was an

eligible candidate for that position. Defendants sought to promote two officers to Sergeant.

37. The first phase of the process was an interview with the New Jersey State Association of Chief of Police "Oral Board", an outside entity, which was weighted as 30% of the overall score. Plaintiff finished second after that phase. After the written essay (30%) and Township interview portions (40%), Defendants ranked Plaintiff third. Defendants promoted Patrolman Vincent Pagano and Brian Herchick to Sergeant.
38. Plaintiff had been assigned as the senior officer in charge from July 2010 through December 2010. During the Township's promotional interview of Plaintiff in or about October 2011, Chief Crawford falsely denied that Plaintiff had been assigned to that position. The Township Administrator subsequently advised Plaintiff that "lack of responsibility" was an issue which negatively impacted him during the promotional process.
39. Subsequent to the scores being issued for the promotional process, Defendants continually and unjustifiably scrutinized Plaintiff's reports. Defendants did not engage in that conduct towards other similarly situated officers regarding their reports. On one occasion, Plaintiff was ordered to redraft an operations report, wherein a derogatory and chastising reference was made to Plaintiff having a masters degree.
40. On or about March 11, 2011, Plaintiff wrote a valid parking summonses to a Township resident who was also a member of the

local First Aid Squad.

41. Two days later, on or about March 13, 2011, Plaintiff reported for his shift. At that time, Sergeant Bittman admonished Plaintiff for writing the summonses and ordered him to void it. Bittman had apologized to the individual to whom Plaintiff lawfully issued the summons. Plaintiff indicated he had provided a courtesy to the individual by writing a summons based upon a local ordinance instead of a motor vehicle violation based upon Title 39 of the New Jersey Statutes.
42. Bittman then became extremely angry at Plaintiff and yelled at him, stating "if you issue that summons you will have to deal with the consequences and we will see what happens to you", or words to that effect.
43. Plaintiff complained to Defendants in writing on or about March 17, 2011 about being ordered by his Sergeant not to issue the summons. Plaintiff cited in his memorandum to Chief Crawford specific rules, regulations, ordinances, and laws which Bittman had violated.
44. Ultimately, Defendants issued a written reprimand against Plaintiff as a result of this incident.
45. On or about January 9, 2012, the Township swore in Pagano and Herchick to Sergeant. Pagano advised Plaintiff that there was a delay in the scores for the Township interviews being issued because Chief Crawford had engineered the scoring process in order to skew it against Plaintiff, in a deliberate and calculated effort to lower Plaintiff's score and prevent him

from being promoted.

46. On or about January 19, 2012, Crawford advised Plaintiff that the Township was going to retest for promotions to the rank of Sergeant, even though promotions had been made off that list only ten (10) days earlier. At the time, Plaintiff was effectively sitting #1 on the list and was next-in-line to be promoted to Sergeant.
47. On or about February 2, 2012, Plaintiff had a meeting with Sergeant Herchick. He advised Plaintiff that he had to increase his arrest numbers. Plaintiff again refused to engage in illegal profiling, stating that he could only arrest individuals whom he observes actually engaging in illegal conduct and could not contrive any arrests.
48. Plaintiff asked Herchick if he could identify any instances where Plaintiff did not effectuate an arrest where he observed illegal conduct. Herchick could provide no such examples.
49. Herchick then ordered Plaintiff to adopt the Department's philosophy of randomly effectuating motor vehicle stops of younger drivers (in their late teens or early 20's) without probable cause, as that would increase Plaintiff's arrest and motor vehicle summons numbers.
50. Plaintiff told Herchick that constituted illegal profiling and a violation of the law regarding probable cause. Plaintiff refused to engage in such conduct. Herchick stated to Plaintiff, "Rob you already have a target on your back you don't need to make it bigger," or words to that effect.

51. The following day, on or about February 3, 2012, Plaintiff met with Sergeant Bittman and told him about his meeting with Herchick. Plaintiff told Bittman that he would not engage in profiling of younger drivers.
52. Approximately one week later on or about February 10, 2012, Plaintiff met with Chief Crawford and Sergeant Herchick. Crawford again falsely indicated that Plaintiff should find a car with a driver and passengers in their late teen's and early 20's, follow them, wait for a violation, and pull them over. Plaintiff refused, stating that he seeks to enforce motor vehicle violations which are actually observed, regardless of the profile of the driver.
53. Less than one month later, on March 5, 2012, Bittman issued a "performance development plan" to Plaintiff in order to attempt to increase his arrests. Notably, Plaintiff had effectuated more arrests than Bittman over the previous five (5) years. Bittman submitted a letter dated March 6, 2012 regarding the "performance plan" to Lieutenant Abrusci of the Department.
54. Plaintiff submitted a written response on or about March 12, 2012, outlining the lack of any legitimate rationale for the need for any such "performance plan". On or about March 16, 2012, Bittman ordered Plaintiff to his office and admonished him for writing the letter.
55. On or about August 14, 2012, Herchick, during his evaluation of Plaintiff, told him he had to improve his spelling in his

reports. Lieutenant Abrusci had a similar conversation with Plaintiff a few days later. Additionally, Herchick rated Plaintiff as "needs improvement" on local ordinance enforcement.

56. On or about August 26, 2012, Plaintiff received a written reprimand purportedly for issuing juveniles summonses for local ordinance violations for being in a park after dark. Plaintiff advised Abrusci that he followed the proper policy and procedure. Abrusci stated to Plaintiff, "Rob you should know better, you should have realized the policy was wrong," or words to that effect. Abrusci then asked Plaintiff how the policy should read in order to be in compliance with New Jersey law. Based upon Plaintiff's research, on or about August 30, 2012, Abrusci changed the policy regarding juvenile matters.
57. On or about October 10, 2012, Bittman wrote up Plaintiff for being late for his shift, even though he arrived at the Department prior to the beginning of his shift. Defendants have not disciplined similarly situated officers in that manner.
58. On or about May 29, 2013, Defendants announced a promotional process for one (1) Lieutenant's position and two (2) Sergeant's positions.
59. The process was comprised of a written essay (worth 30% of the total score), a Sergeant Staff interview (30%) and the Township Committee Interview (40%).

60. During the promotional process, Defendants falsely accused Plaintiff of cheating, specifically by plagiarizing his written answers to the essay questions. There was no legitimate basis for such an allegation. Plaintiff was given a poor score for the written and Township interview phases of the promotional process based upon this scurrilous and false allegation.
61. During the promotional process, Herchick told Plaintiff that he did not write his own essay. Herchick also referenced Plaintiff's refusal to profile and target younger drivers for motor vehicle stops.
62. Ultimately, Defendants promoted Patrolman Daniel Taquinto and Matthew Ambrosi to Sergeant by way of Township Resolution dated December 23, 2013.
63. Defendants continue to encourage officers to write as many summonses and effectuate motor vehicle stops regardless of whether probable cause exists, including a quota implemented in or about November 2013 whereby patrolmen assigned to a detail were required to write fifteen (15) tickets in a four (4) hour span. According to Herchick, if an officer did not issue the 15 summonses, then that officer would not be eligible for overtime.
64. Additionally, superiors in the Department systematically train younger officers to shine a light into a moving vehicle in order to determine the age of the vehicle's driver and passengers.

65. Defendants have, and continue to, deny Plaintiff opportunities for overtime work and the resulting pay. Beginning in or about 2012 and continuing to in or about September 2013, Plaintiff received no overtime opportunities, resulting in significant economic loss to Plaintiff as a result of Defendants' retaliatory conduct.
66. Defendants continue to limit Plaintiff's overtime opportunities as compared to other officers, by calling Plaintiff in for overtime assignments only if no other officers are available.
67. The adverse employment actions, harassment and other illegal acts by Defendant against Plaintiff as outlined above are/were initiated by Defendant for the purpose to harass, intimidate, and retaliate against Plaintiff based on Plaintiff's protected whistle-blowing activities outlined herein.

COUNT ONE
(Violation of CEPA
N.J.S.A. 34:19-1 et seq.)

68. Plaintiff reasserts and realleges each and every previous paragraph as if fully set forth and reiterated herein.
69. Defendants' actions against Plaintiff, as outlined above, are in retaliation for Plaintiff's whistle-blowing activities described herein, in violation of the New Jersey Conscientious Employee Protection Act ("CEPA"), N.J.S.A. 34:19-1 et seq.
70. Plaintiff engaged in "whistle-blowing" activities in that he disclosed and objected to, and/or refused to participate in,

Defendants' conduct which he reasonably believed was in violation of law and/or public policy, and/or rules or regulations promulgated pursuant to law and/or public policy, was fraudulent, and/or negatively impacted the health, safety and welfare of the public. In retaliation for his whistle-blowing activities, Plaintiff suffered adverse employment action(s) and other retaliatory and harassing acts at the hands of Defendants, as outlined above.

71. Those adverse employment actions include, but are not limited to, Defendants' failure to promote Plaintiff to the rank of Sergeant, as well as disciplinary action and loss of overtime opportunities and pay.
72. Defendants created, and continue to create, a hostile work environment against Plaintiff in retaliation for his whistle-blowing activities.
73. Defendants' adverse employment actions and harassment against Plaintiff are without any legitimate and/or lawful purpose. The purported rationale for Defendants' adverse employment actions are pre-textual and are advanced in order to mask Defendants' retaliatory intent.
74. Defendants' harassing and retaliatory actions against Plaintiff constitute violations of CEPA.
75. As a result, Plaintiff's statutory rights have been violated and his protections under the law have been eviscerated.
76. Plaintiff has suffered damages resulting in the loss of compensation and benefits, loss of earning power, physical

injury, mental injury, the loss of opportunities for prospective employment, the loss of fringe benefits, loss of overtime opportunities, and is incurring legal expenses and other expenses as a result of Defendants' actions.

77. Defendants' foregoing actions were knowing, willful and deliberate violations of law and deprivations of Plaintiff's statutory and civil rights, and Plaintiff is entitled to punitive damages under applicable law.

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

a. Awarding Plaintiff damages, including, but not limited to, equitable, punitive and compensatory damages on all lost benefits, wages and rights, including but not limited to front and back pay, lost earning power, as well as all commensurate pension benefits, the adverse tax consequences of a lump sum award, and other benefits with respect to Plaintiff's employment, and non-economic damages for emotional distress, together with both prejudgment and post-judgment interest and attorneys' fees and costs of court for Defendants' violations of Plaintiff's civil rights;

b. Awarding Plaintiff damages, including, but not limited to, equitable, punitive and compensatory damages on all lost benefits, wages and rights, including but not limited to front and back pay, lost earning power, as well as all commensurate pension benefits, the adverse tax consequences of a lump sum award, and

other benefits with respect to Plaintiff's employment, and non-economic damages for emotional distress, together with both prejudgement and post-judgement interest and attorneys' fees and costs of court with regard to hostile work environment, retaliation, disparate treatment, and with regard to adverse employment action(s) and other retaliation and harassment as a result of Plaintiff's whistle-blowing activities;

c. Awarding Plaintiff damages, including, but not limited to, equitable, punitive, compensatory and liquidated damages provided by statute or common law on all lost benefits, wages and rights, including but not limited to front and back pay, lost earning power, as well as all commensurate pension benefits and fringe benefits, the adverse tax consequences of a lump sum award, and other benefits with respect to Plaintiff's employment, and non-economic damages for emotional distress, together with both prejudgement and post judgement interest and attorneys' fees and costs of court as Defendants have violated Plaintiff's rights to be free from the injuries which he has suffered due to the Defendants' actions;

d. For an Order from the Court instating Plaintiff to the rank and position of Police Sergeant, and/or an Order restoring Plaintiff to his position which was in place prior to the adverse employment action imposed by Defendants in violation of CEPA, in addition to the award of compensatory and punitive damages, and attorneys' fees and costs, flowing therefrom, as outlined above;

e. For an Order from the Court expunging Plaintiff's

personnel and internal affairs / disciplinary files maintained by Defendants of any disciplinary action instituted in retaliation for Plaintiff's protected activity;

f. For an Order of the Court awarding Plaintiff with any additional relief permitted by CEPA;

g. For an Order of the Court retaining jurisdiction over this action until Defendants have fully complied with the Orders of this Court, and that the Court require Defendants to file such reports as may be necessary to supervise such compliance; and

h. For such other, further, additional and different relief as this Court deems just and proper.

DESIGNATION OF TRIAL COUNSEL

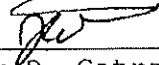
Pursuant to R. 4:25-4, the Court is advised that Jeffrey D. Catrambone, Esq., is hereby designated as trial counsel.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues involved herein pursuant to R. 4:35-1.

Respectfully submitted,
SCIARRA & CATRAMBONE, L.L.C.,
Attorneys for Plaintiff

Dated: May 23, 2014

By: 

Jeffrey D. Catrambone, Esq.

CERTIFICATION PURSUANT TO R. 4:5-1

The undersigned, of full age, hereby certifies as follows:

1. The matter in controversy is not the subject of any other pending action before any Court.

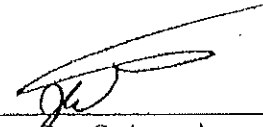
2. No other action or arbitration proceeding is contemplated.

3. There are no other parties to be joined in this action at the present time.

I hereby certify that the foregoing statements made by me are true.

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

Dated: May 23, 2014


Jeffrey D. Catrambone, Esq.

MORRIS COUNTY
SUPERIOR COURT
COURT STREET
MORRISTOWN

NJ 07960

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 656-4100
COURT HOURS 9:30 AM - 4:30 PM

DATE: MAY 27, 2014
RE: WYSOKOWSKI VS TOWNSHIP OF HENRIAM
DOCKET: MRS L -001324 14

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RDS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON DONALD S. COBURN

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (973) 656-4100.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JEFFREY D. LATRAMBONE
SCIARRA & LATRAMBONE
1130 CLIFTON AVE STE 3
CLIFTON NJ 07013

JUN2010