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Michael G. Donahue, Esq., Attorney ID#: 04577-1994
Attorneys for Plaintiffs, Janine Sante

JANINE SANTE,

Plaintiff,

vs.

TOWNSHIP OF MONTGOMERY;
MONTGOMERY TOWNSHIP POLICE
DEPARTMENT: CONNOR A.
CHAPKOWSKI; CHRISTINA A. LENZO;
and JOHN DOES 1-10 (fictitious
designations).

Defendants.

SUPERIOR COURT OF NEW JERSEY
SOMERSET COUNTY LAW DIVISION

Docket No.

CIVIL ACTION

COMPLAINT AND
JURY DEMAND

DEMAND FOR ANSWERS
TO INTERROGATORIES

Plaintiff, JANINE SANTE, residing at 127 Franklin Court, in the Township of
Flemington, County of Hunterdon, and State of New Jersey, by way of Complaint, says:

FIRST COUNT

1. On or about November 9, 2017, Plaintiff, JANINE SANTE, was a passenger in
a vehicle which she owned which was being operated by Defendant, CHRISTINA A. LENZO.

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ATTORNEY AT LAW

on Orchard Road at its intersection with Burnt Hill Road, in the Township of Montgomery, County of Somerset, and State of New Jersey.

2. At or about the same time and place, Defendants, TOWNSHIP OF MONTGOMERY and/or MONTGOMERY TOWNSHIP POLICE DEPARTMENT, were the owners of a motor vehicle which was being operated by Defendant, CONNOR A. CHAPKOWSKI, as agent, servant, and/or employee of Defendant, TOWNSHIP OF MONTGOMERY, MONTGOMERY TOWNSHIP POLICE DEPARTMENT, and/or Defendant, JOHN DOES 1-10 (fictitious designations), and/or otherwise with the knowledge, consent and/or permission of Defendant, TOWNSHIP OF MONTGOMERY, MONTGOMERY TOWNSHIP POLICE DEPARTMENT, and/or Defendant, JOHN DOES 1-10 (fictitious designations), on Burnt Hill Road at its intersection with Orchard Road, in the Township of Montgomery, County of Somerset, and State of New Jersey.

3. At present, the identities of Defendants, JOHN DOES 1-15, are unknown. As such, "JOHN DOES 1-5", are fictitious designations, representing one or more individuals, sole proprietorships, associations, limited partnerships, general partnerships, limited liability companies and/or corporations, which in any way owned, possessed, controlled, entrusted, insured, hired for and/or maintained any motor vehicle(s) which caused or contributed to the accident at issue herein, or who were otherwise responsible, in whole or in part, for the said accident or the injuries sustained by the Plaintiff.

4. At present, the identities of Defendants, JOHN DOES 6-10, are unknown. As such, "JOHN DOES 6-10", are fictitious designations, representing one or more individuals, sole proprietorships, associations, limited partnerships, general partnerships, limited liability companies and/or corporations, which in any way trained, drafted policies or procedures,

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implemented policies or procedures, supervised or otherwise controlled the entity or entities and/or individual or individuals who caused or contributed to the accident at issue herein, or who were otherwise responsible, in whole or in part, for the said accident or the injuries sustained by the Plaintiff.

5. At all times material hereto, Defendants, TOWNSHIP OF MONTGOMERY, MONTGOMERY TOWNSHIP POLICE DEPARTMENT, CONNOR A. CHAPKOWSKI, CHRISTINA A. LENZO, and/or JOHN DOES 1-10 (fictitious designations), so negligently owned, operated, maintained, insured, entrusted and/or hired for, their motor vehicles so as to cause a collision.

6. At all times material hereto, Defendants, TOWNSHIP OF MONTGOMERY, MONTGOMERY TOWNSHIP POLICE DEPARTMENT, and/or JOHN DOES 6-10 (fictitious designations), so recklessly, negligently and/or unreasonably trained, drafted policies or procedures, implemented policies or procedures, enforced policies or procedures, supervised or otherwise controlled the entity or entities and/or individual or individuals who caused or contributed to the accident at issue herein, so as to be responsible, in whole or in part, for the said accident or the injuries sustained by the Plaintiff.

7. As a direct and proximate result of the carelessness, recklessness, and negligence of the Defendants, TOWNSHIP OF MONTGOMERY, MONTGOMERY TOWNSHIP POLICE DEPARTMENT, CONNOR A. CHAPKOWSKI, CHRISTINA A. LENZO, and/or JOHN DOES 1-10 (fictitious designations), as aforesaid, and their disregard for the safety of others, Plaintiff, JANINE SANTE, was caused to suffer severe bodily injuries, some or all of which are permanent in nature; was caused to sustain a permanent loss of a bodily function; has been caused to aggravate any pre-existing medical condition, symptomatic

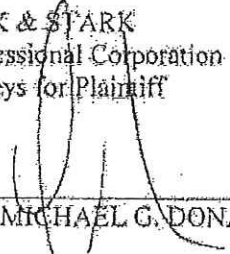
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and/or asymptomatic, which is permanent; has been caused and will be caused great pain and suffering; has been caused and will be caused to expend large sums of money for medical treatment necessary to effect a cure for his injuries in excess of \$3,600.00; and, has been caused and will be caused to lose large sums of money due to his inability to pursue his usual occupation.

6. Plaintiff, JANINE SANTE, has complied with all conditions set forth in N.J.S.A. 59:8-1, et seq.

WHEREFORE, Plaintiff, JANINE SANTE, demands Judgment for all damages available including punitive damages against the Defendants TOWNSHIP OF MONTGOMERY, MONTGOMERY TOWNSHIP POLICE DEPARTMENT, CONNOR A. CHAPKOWSKI, CHRISTINA A. LENZO, and/or JOHN DOES 1-10 (fictitious designations), individually, jointly, severally, or in the alternative, together with interest and costs of suit.

STARK & STARK
A Professional Corporation
Attorneys for Plaintiff

By: 
MICHAEL G. DONAHUE

JURY DEMAND

Plaintiffs, JANINE SANTE, hereby demand a trial by jury as to all issues.

CERTIFICATION OF OTHER ACTIONS/PARTIES

Pursuant to the provisions of Rule 4:5-1, the undersigned attorney certifies that this matter is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated, and all known necessary parties have been joined in this action.

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CERTIFICATION OF COMPLIANCE WITH R.1:38-7(c)(1)

Pursuant to R. 1:38-7(b), all confidential identifiers of the parties to this action have or will be redacted from all documents or pleadings submitted to the court.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of Rule 4:25-4 the Court is advised that MICHAEL G. DONAHUE is hereby designated as trial counsel.

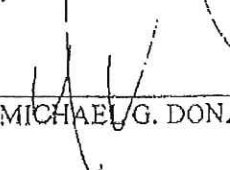
DEMAND FOR ANSWERS TO INTERROGATORIES
& SUPPLEMENTAL INTERROGATORIES

Plaintiffs, JANINE SANTE, demand that Defendants, TOWNSHIP OF MONTGOMERY, MONTGOMERY TOWNSHIP POLICE DEPARTMENT, CONNOR A. CHAPKOWSKI, and CHRISTINA A. LENZO, provide answers to interrogatories as follows:

FORM C and FORM C(1) UNIFORM INTERROGATORIES as set forth in Appendix II of the New Jersey Court Rules.

SUPPLEMENTAL INTERROGATORIES #1-10.

STARK & STARK
A Professional Corporation
Attorneys for Plaintiff

By: 
MICHAEL G. DONAHUE

Dated: March 1, 2019

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