

DEL VACCHIO O'HARA, P.C.  
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Attorneys for Plaintiff

|                              |   |                                |
|------------------------------|---|--------------------------------|
| MORGAN JONES                 | : | SUPERIOR COURT OF NEW JERSEY   |
|                              | : | LAW DIVISION - SOMERSET COUNTY |
| Plaintiff                    | : | DOCKET NO.                     |
|                              | : |                                |
| vs.                          | : | Civil Action                   |
|                              | : |                                |
| MONTGOMERY TOWNSHIP POLICE   | : |                                |
| DEPARTMENT, TOWNSHIP OF      | : |                                |
| MONTGOMERY, CONNOR A.        | : |                                |
| CHAPKOWSKI, CHRISTINA LENZO, | : |                                |
| JANINE SANTE AND JOHN DOES   | : |                                |
| 1-15(representing presently  | : | COMPLAINT, JURY DEMAND,        |
| unknown individuals,         | : | DESIGNATION OF TRIAL COUNSEL,  |
| businesses, partnerships,    | : | CERTIFICATION, DEMAND FOR      |
| and/or corporations who      | : | DISCOVERY OF INSURANCE         |
| owned, operated, maintained  | : | COVERAGE, DEMAND FOR           |
| supervised and/or controlled | : | ANSWERS TO INTERROGATORIES,    |
| the vehicle in question or   | : | AND REQUEST FOR PRODUCTION     |
| otherwise employed the       | : | OF DOCUMENTS                   |
| defendants),                 | : |                                |
|                              | : |                                |
| Defendants                   | : |                                |

Plaintiff, Morgan Jones, residing at 93 Franklin Court,  
Flemington, NJ 08822, County of Hunterdon and State of New Jersey,  
by way of Complaint against the defendants says:

COUNT ONE

1. On or about November 9, 2019, the plaintiff, Morgan Jones  
was a passenger in a motor vehicle operated by Defendant, Christina  
Lenzo, which was traveling on Burnt Hill Road at the intersection  
of Orchard Road in Montgomery Township, New Jersey.

2. At or about the time and place aforesaid, 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, 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 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 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, associations, limited partnerships, general partnerships, limited liability companies and/or corporations, which in any way trained, drafted policies or procedures, 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, Janine Sante 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 carelessness, recklessness, and negligence of the defendants, Township of Montgomery, Montgomery Township Police Department, Connor A. Chapkowski, Christina A. Lenzo, Janine Sante, and/or John Does 1-10 (fictitious designations), as aforesaid, and their disregard for the safety of others, Plaintiff, Morgan Jones, 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 and/or asymptomatic, which is permanent; has been caused and will be caused to expend large sums of money for medical treatment necessary to effect a cure for her injuries in excess of \$3,600.00: and, has been caused and will be caused to lose large sums of money due to her inability to pursue her usual occupation.

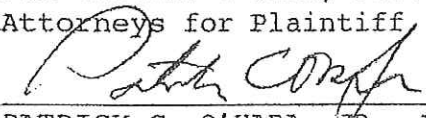
8. Plaintiff, Morgan Jones, has complied with all conditions set forth in N.J.S.A. 59:8-1, et seq.

WHEREFORE, Plaintiff, Morgan Jones demands Judgement for all damages available including punitive damages against the Defendants, Township of Montgomery, Montgomery Township Police Department, Christina A. Lenzo, Janine Sante, Connor A. Chapkowski and or John Does 1-10 (fictitious designations), individually, jointly, severally, or in the alternative, together with interest and costs of suit.

DEL VACCHIO O'HARA, P.C.

Attorneys for Plaintiff

By:

  
PATRICK C. O'HARA, JR., ESQ.

Dated:

11/6/19

JURY DEMAND

Plaintiff, pursuant R. 4:35-1, demands a trial by jury of not less than six (6) as to all issues.

DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Patrick C. O'Hara, Jr., Esq. as trial counsel in the above matter for the firm of Del Vacchio O'Hara, P.C., pursuant to R. 4:25-4.

CERTIFICATION PURSUANT R. 4:5-1

I hereby certify that this matter is not the subject matter of any other suit, pending or contemplated, in any other court or arbitration proceedings.