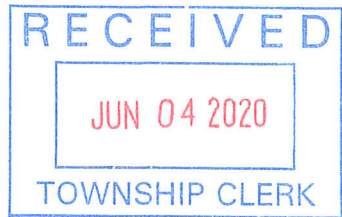


BASTARRIKA, SOTO, GONZALEZ, & SOMOHANO, LLP
3 GARRET MOUNTAIN PLAZA - SUITE 302
WOODLAND PARK, NEW JERSEY 07434
TEL. # (973) 977-9919
ATTORNEYS FOR PLAINTIFF(S)



GUILLIAN IFILL as guardian ad litem for
KELLY IFILL, a minor

SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY- Law Division
DOCKET# BER-L-003202-20

PLAINTIFF(S),
Vs.

CIVIL ACTION

TOWNSHIP OF TEANECK, TOWNSHIP OF
TEANECK POLICE DEPARTMENT, JUVENILE
DETECTIVE RYLAND (#242), PAGAN (#315), JOHN DOES 1-10,
FICTICIOUS INDIVIDUALS AND ABC & XYZ CO,
1-10 FICTICIOUS BUSINESS ENTITIES,

DEFENDANTS,

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, and 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.

DATED: June 3, 2020

/s/ Michelle M. Smith

Michelle M. Smith Clerk of the Superior Court

Name of Defendant to be served:
Address for service:

TOWNSHIP OF TEANECK
818 TEANECK ROAD
TEANECK, NJ

David Ventoso, Esq. (187612020)
Bastarrika, Soto, Gonzalez & Somohano, LLP
3 Garret Mountain Plaza, Suite 302
Woodland Park, NJ 07424
Tel (973) 977-9919
Attorney(s) for Plaintiff

**Gillian Ifill as guardian ad litem for Kelly Ifill, a
minor,**

Plaintiff,

v.

**Township of Teaneck, Township of Teaneck
Police Department, Juvenile Detective Ryland
(#242), and Juvenile Detective Pagan (#315),
John and Jane Does 1-10 (fictitious persons),
ABC and XYZ Corporations 1-10 (fictitious
entities),**

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
BERGEN COUNTY**

DOCKET NO.: BER-L- 003202-20

COMPLAINT

Plaintiff, **Gillian Ifill as guardian ad litem for Kelly Ifill**, by and through her counsel, Bastarrika, Soto, Gonzalez & Somohano, LLP, by way of Complaint against the Defendants, allege as follows:

PARTIES

1. Plaintiff, **Kelly Ifill** (hereinafter referred to as "Plaintiff"), a minor (D.O.B. 06/08/2002), resides at **169 Griggs Avenue, Teaneck Township, New Jersey 07666**.
2. **Gillian Ifill** is the guardian ad litem for the Plaintiff and resides at **169 Griggs Avenue, Teaneck Township, New Jersey 07666**.
3. Defendant, **Township of Teaneck** (hereinafter referred to as "Teaneck"), is a municipal corporation organized under the laws of the State of New Jersey. At all times relevant hereto,

Defendant Teaneck, acting through the Township of Teaneck Police Department (hereinafter referred to as "TPD"), was responsible for the policy, practice, supervision, implementation, and conduct of all TPD matters and was responsible for the appointment, training, supervision, discipline, and retention and conduct of all TPD personnel. In addition, at all times here relevant, Defendant Teaneck was responsible for enforcing the rules of the TPD, and for ensuring that the TPD personnel obey the laws of the United States and the State of New Jersey. Defendant, Teaneck, has a mailing address for purposes of this claim located at **818 Teaneck Road, Teaneck, New Jersey 07666.**

4. Defendant, **Township of Teaneck Police Department** ("TPD"), is the municipal law enforcement agency of the Teaneck located at 900 Teaneck Rd, Teaneck, NJ 07666. At all times relevant hereto, Defendant TPD, acting through both individual Defendants (Juvenile Detective Ryland (#242) and Juvenile Detective Pagan (#315)) listed on the caption of this complaint, was responsible for the policy, practice, supervision, implementation, and conduct of both individual Defendants and was responsible for the appointment, training, supervision, discipline, and retention and conduct of all TPD personnel, including both individual Defendants. In addition, at all times here relevant, Defendant TPD was responsible for enforcing the rules for both individual defendants and ensuring both individual defendants obey the laws of the municipality, Defendant Teaneck, United States and the State of New Jersey. Defendant, TPD, has a mailing address for purposes of this claim located at **818 Teaneck Road, Teaneck, New Jersey 07666.**
5. Individual Defendant #1, **Juvenile Detective Ryland (#242)** (hereinafter referred to as "Ryland"), has a residential address that is unknown to the Plaintiff as this time. He is currently employed as a police officer, to wit a juvenile detective, at TPD. Defendant, Ryland, has a mailing address for purposes of this claim located at **818 Teaneck Road, Teaneck, New Jersey 07666.**

6. Individual Defendant #2, **Juvenile Detective Pagan** (#315) (hereinafter referred to as “Pagan”), has a residential address that is unknown to the Plaintiff as this time. He is currently employed as a police officer, to wit a juvenile detective, at TPD. Defendant, Pagan, has a mailing address for purposes of this claim located at **818 Teaneck Road, Teaneck, New Jersey 07666**.
7. Defendants, **John and Jane Does 1-10 (fictitious persons), ABC and XYZ Corporations 1-10 (fictitious entities)**, are fictitious names and businesses intended to identify any and all parties, including individuals, corporations and/or other entities whose identities are presently unknown to the Plaintiff, and whose identities, when revealed, will halt the running of the Statute, who together with the named defendants were responsible for ownership, operation, control, management and supervision of the aforesaid defendants and/or employees.
8. At all times here mentioned Defendants were acting under color of the laws of the United States and United States Constitution, State of New Jersey law and New Jersey Constitution, and Township of Teaneck local law in accordance with the statutes, ordinances, regulations, policies, customs and usages of such laws.
9. For ease of reference, the Defendants cited in this claim, Teaneck, TPD, Ryland, and Pagan, will be collectively referred to as “Defendants.”

FACTUAL ALLEGATIONS

10. On or around Tuesday, March 22, 2016, while Plaintiff was on her way back from school, she was approached by two Teaneck Police officers dressed in plain clothes, later identified in the Teaneck Police Incident Report as the individual defendants in the above-referenced caption, Ryland and Pagan.

11. Ryland and Pagan, alerted on an alleged shoplifting that occurred at CVS located at 188 Cedar Lane, Teaneck, New Jersey 07666 (hereinafter referred to as "CVS"), asked Plaintiff whether she stopped at CVS on her walk home from school that afternoon.
12. Plaintiff informed the officers that she had not been in the vicinity of CVS that afternoon.
13. Plaintiff was prevented from calling her mother during the interaction with Ryland and Pagan.
14. Plaintiff was handcuffed and placed inside a police vehicle while the officers spoke to the CVS manager to make an identification of the shoplifting suspect.
15. The CVS manager positively identified Plaintiff as the alleged shoplifter.
16. Ryland and Pagan detained Plaintiff while they searched her backpack for the alleged shoplifted soda and chips from CVS.
17. The officers' search yielded negative results.
18. Thereafter, Ryland and Pagan transported Plaintiff back to her home and spoke to Plaintiff's mother about the incident.
19. Plaintiff has consulted and had eleven (11) appointments with a psychologist because of psychological and emotional turmoil she experienced during the encounter on March 22, 2016.
20. As a result of the encounter with Ryland and Pagan, Plaintiff suffers and continues to suffer psychological and emotional harm.

COUNT ONE (False Arrest)

21. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 20 as if fully set forth herein at length.
22. The Defendants arrested and detained Plaintiff against her will on the date of this incident.
23. The arrest of the Plaintiff was without proper legal authority, legal justification, or probable cause.
24. As a result, Plaintiff suffered damages.

WHEREFORE, Plaintiff demands judgment against Defendants, for:

- a. Compensatory damages;
- b. Punitive damages;
- c. Interest and costs of suit;
- d. Attorney's fees and costs;
- e. Such other and further relief as the Court deems proper and just.

COUNT TWO (Intentional Infliction of Emotional Distress)

25. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 24 as if fully set forth herein at length.
26. The Defendants false arrest, by placing Plaintiff in handcuffs, and improper search of Plaintiff's backpack in violation of both U.S. Constitution and N.J. Constitution's 4th Amendment, is extreme and outrageous conduct.
27. By placing Plaintiff, a minor of thirteen (13) years of age attending 8th grade at the time, in handcuffs in a police vehicle and then improperly seizing and searching her backpack was conduct was intentional that the officers knew or should have known would have produced emotional distress.
28. Moreover, by placing Plaintiff, a minor of thirteen (13) years of age attending 8th grade at the time, in handcuffs in a police vehicle and then improperly seizing and searching her backpack was conduct that was reckless and disregarded the high degree of probability that Plaintiff would experience emotional distress as a result.
29. The officer's conduct during the encounter on March 22, 2016 proximately caused Plaintiff to suffer emotional distress so severe that no reasonable person could be expected to endure it.

WHEREFORE, Plaintiff demands judgment against Defendant, for:

- a. Compensatory damages;
- b. Punitive damages;

- c. Interest and costs of suit;
- d. Attorney's fees and costs;
- e. Such other and further relief as the Court deems proper and just.

COUNT THREE (Bias Crime Causing Damage)

- 30. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 29 as if fully set forth herein at length.
- 31. Defendants unlawfully and falsely arrested Plaintiff, a crime according to N.J.S.A. 2C:13-3.
- 32. Defendants conduct was for the purpose of intimidating Plaintiff because of race, color, religion, gender, disability, gender identity or expression, national origin, sexual orientation, or ethnicity.
- 33. As a result, of the this false arrest, Plaintiff suffered emotional distress.

WHEREFORE, Plaintiff demands judgment against Defendant, for:

- a. Damages for emotional distress;
- b. Injunctive relief;
- c. Punitive damages;
- d. Interest and costs of suit;
- e. Attorney's fees and costs;
- f. Such other and further relief as the Court deems proper and just.

COUNT FOUR (Respondeat Superior)

- 34. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 33 as if fully set forth herein at length.
- 35. Defendants, Teaneck and TPD, were the employers of Ryland and Pagan at the time of the incident described herein.
- 36. The officers (Ryland and Pagan) committed the wrong upon the Plaintiff within the scope of the employment relationship to Teaneck and TPD.

37. The officers' (Ryland and Pagan) wrongful conduct upon the Plaintiff (i) was of the kind that the officers (Ryland and Pagan) is engaged or employed to perform; (ii) occurred substantially within the authorized time and space limits, and (iii) was actuated in part by a purpose to serve Teaneck and TPD.
38. Further, Teaneck and TPD was reckless and failed to exercise reasonable care in either the implementation of policy, practice, supervision, appointment, training, supervision, discipline, retention and conduct of Ryland and Pagan.
39. Teaneck and TPD (i) knew or had reason to know of particular unfitness, incompetence, or dangerous attributes of the individual Defendants, Ryland and Pagan, (ii) could have reasonably foreseen that such qualities created a risk of harm to other persons, and (iii) the wronged party's injuries were proximately caused by the wrongdoers' incompetence, unfitness, or dangerous characteristics.
40. Teaneck and TPD demonstrated willful indifference to egregious conduct of Ryland and Pagan.

WHEREFORE, Plaintiff demands judgment against Defendant, for:

- a. Compensatory damages;
- b. Punitive damages;
- c. Interest and costs of suit;
- d. Attorney's fees and costs;
- e. Such other and further relief as the Court deems proper and just.

COUNT FIVE (Public Employee Wrongfully Enforcing Law)

41. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 40 as if fully set forth herein at length.
42. Defendants wrongful execution and enforcement of the penal law of the State of New Jersey proximately caused damages to Plaintiff.

43. Such acts by the Defendants are without reasonable good faith.
44. Officers, Ryland and Pagan, are liable for damages against Plaintiff.
45. Teaneck and TPD are vicariously liable for the conduct of Ryland and Pagan, because the acts by Ryland and Pagan were (i) within the scope of employment, and/or (ii) criminal, fraudulent, malicious, or willful misconduct.

WHEREFORE, Plaintiff demands judgment against Defendants, for:

- a. Compensatory damages;
- b. Punitive damages;
- c. Interest and costs of suit;
- d. Attorney's fees and costs;
- e. Such other and further relief as the Court deems proper and just.

COUNT SIX (Public Entity Liable for Act of Public Employee)

46. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 45 as if fully set forth herein at length.
47. Teaneck and TPD are a public entity that is responsible in part for the enforcement and execution of the laws of the municipality and the State of New Jersey by way of their public employees.
48. As a result of the wrongful conduct of two public employees, Ryland and Pagan, Plaintiff suffered severe emotional distress.
49. Plaintiff's injuries were proximately caused by the acts of Ryland and Pagan, public employees, within the scope of their employment with Teaneck and TPD.
50. Teaneck and TPD (i) knew or had reason to know of particular unfitness, incompetence, or dangerous attributes of the individual Defendants, Ryland and Pagan, (ii) could have reasonably foreseen that these attributes created a risk of harm to other persons, and (iii) the wronged party's

injuries were proximately caused by the wrongdoers' incompetence, unfitness, or dangerous characteristics.

WHEREFORE, Plaintiff demands judgment against Defendants, for:

- a. Compensatory damages;
- b. Punitive damages;
- c. Interest and costs of suit;
- d. Attorney's fees and costs;
- e. Such other and further relief as the Court deems proper and just.

COUNT SEVEN (State or U.S. Constitutional Rights Violation)

- 51. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 50 as if fully set forth herein at length.
- 52. Plaintiff's rights are protected by the New Jersey State Constitution and the United States Constitution.
- 53. Defendants, collectively violated Plaintiff's rights under the New Jersey State Constitution and the United States Constitution, which proximately caused Plaintiff's damages.
- 54. To wit, Defendants violated Plaintiffs right to (i) the right to enjoy and defend life and liberty, (ii) the right to pursue and obtain safety and happiness, (iii) the right to due process of law, (iv) right to equal protection of the laws, (v) the right to be secure against unreasonable searches or seizures, and (vi) the right to any other natural and unalienable right retained by the people.
- 55. Defendants acted within the color of law of the United States Constitution, New Jersey Constitution, laws of the United States, laws of the State of New Jersey, and/or laws of the municipality of Teaneck, New Jersey.
- 56. Further, Defendants deprived, interfered, or attempted to interfere by threats, intimidation, or coercion of the exercise or enjoyment by Plaintiff of any substantive de process or equal protection

rights, privileges or immunities secured by the United States Constitution or laws of the United States, or any substantive rights, privileges or immunities secured by the New Jersey Constitution or laws of the State of New Jersey.

57. Therefore, Defendants are liable to Plaintiff for damages, injunctive, or other appropriate relief.

WHEREFORE, Plaintiff demands judgment against Defendants, for:

- a. Compensatory damages;
- b. Injunctive relief;
- c. Punitive damages;
- d. Interest and costs of suit;
- e. Attorney's fees and costs;
- f. Such other and further relief as the Court deems proper and just.

COUNT EIGHT (Violation of § 1983 of Civil Rights Act of 1871)

58. Plaintiff repeats and re-alleges the allegations of Paragraphs 1 through 57 as if fully set forth herein at length.

59. Plaintiff's rights are protected by the New Jersey State Constitution, United States Constitution, along their respective Amendments.

60. Further, Plaintiff's rights are protected by the laws of the State of New Jersey and United States.

61. Defendants' conduct, the arrest of Plaintiff, was central police function, which was an act "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia" (42 U.S.C.A. § 1983 (2017)).

62. The false arrest of Plaintiff was in violation of the Plaintiff's rights, including but not limited to (i) the right to enjoy and defend life and liberty, (ii) the right to pursue and obtain safety and happiness, (iii) the right to due process of law, (iv) right to equal protection of the laws, (v) the

right to be secure against unreasonable searches or seizures, and (vi) the right to any other natural and unalienable right retained by the people.

63. Further, Defendants deprived, interfered, or attempted to interfere by threats, intimidation, or coercion of the exercise or enjoyment by Plaintiff of any substantive de process or equal protection rights, privileges or immunities secured by the United States Constitution or laws of the United States, or any substantive rights, privileges or immunities secured by the New Jersey Constitution or laws of the State of New Jersey.

64. Therefore, Defendants are liable to Plaintiff for damages, injunctive, or other appropriate relief.

WHEREFORE, Plaintiff demands judgment against Defendants, for:

- a. Compensatory damages;
- b. Injunctive relief;
- c. Punitive damages;
- d. Interest and costs of suit;
- e. Attorney's fees and costs;
- f. Such other and further relief as the Court deems proper and just.

DEMAND FOR ANSWERS TO INTERROGATORIES

Plaintiff hereby demands that *all* Defendants provide answers to the attached *Plaintiff's Demand for Answers to Interrogatories*.

DEMAND FOR REQUESTS FOR ADMISSION

Plaintiff hereby demands that Defendants, **Juvenile Detective Ryland and Juvenile Detective Pagan**, provide answers to the attached *Requests for Admission*.

DEMAND FOR RESPONSES TO NOTICE TO PRODUCE

Plaintiff hereby demands that *all* Defendants provide responses to the attached *Notice to Produce Documents*.

DESIGNATION OF TRIAL COUNSEL

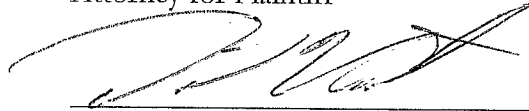
Pursuant to Rule 4:25-4, David Ventoso, Esq., is hereby designated as trial counsel for the Plaintiff in this case.

RULE 4:5-1 CERTIFICATION

I am the attorney for the Plaintiff in the foregoing Complaint. The matter in controversy is not the subject of any pending arbitration proceeding or other action and no arbitration proceeding is contemplated in the future.

I hereby 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.

Bastarrika, Soto, Gonzalez, & Somohano, LLP.
Attorney for Plaintiff

A handwritten signature in black ink, appearing to read 'David Ventoso', is written over a horizontal line.

David Ventoso, Esq.

Dated: June 2, 2020

David Ventoso, Esq. (187612020)
Bastarrika, Soto, Gonzalez & Somohano, LLP
3 Garret Mountain Plaza, Suite 302
Woodland Park, NJ 07424
Tel (973) 977-9919
Attorney(s) for Plaintiff

Gillian Ifill *as guardian ad litem* for Kelly Ifill, a
minor,

Plaintiff,

v.

Township of Teaneck, Township of Teaneck
Police Department, Juvenile Detective Ryland
(#242), and Juvenile Detective Pagan (#315),
John and Jane Does 1-10 (fictitious persons),
ABC and XYZ Corporations 1-10 (fictitious
entities),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
BERGEN COUNTY
DOCKET NO.: BER-L-

PLAINTIFF'S DEMAND FOR ANSWERS TO
INTERROGATORIES

To: Township of Teaneck
818 Teaneck Road
Teaneck, New Jersey 07666

Juvenile Detective Ryland (#242)
Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

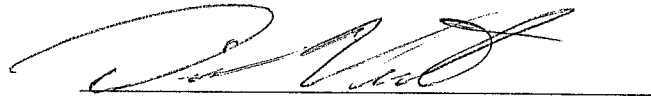
Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

Juvenile Detective Pagan (#315)
Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

PLEASE TAKE NOTICE that Plaintiff, Gillian Ifill *as guardian ad litem* for Kelly Ifill, a
minor, by and through its counsel, David Ventoso, Esq. from the law firm of Bastarrika, Soto,
Gonzalez & Somohano, LLP, hereby demands that Defendants provide certified answers Plaintiff's
Demand for Answers to Interrogatories in accordance with R. 4:17. You have sixty (60) days to
provide answers to these Interrogatories.

Bastarrika, Soto, Gonzalez, & Somohano, LLP.
Attorney for Plaintiff

Dated: June 2, 2020



David Ventoso, Esq.

Interrogatories

1. Please state the name and address of the individual answering this set of interrogatories.
2. Please provide the badge number, if applicable, of the person answering this interrogatory.
3. Please list the employer and current position of the person answering this interrogatory.
4. Please provide details describing your present work including but not limited to (a) the nature of the work, (b) the length of time at your present employer, (c) if no longer working, details as to the termination.
5. State you position, employer, and job duties on March 22, 2016 (hereinafter referred to as "the date of the incident").
6. Set forth your badge number and other identifying details on the date of the incident.
7. Please list prior employment history including (a) position(s) held, (b) name of employer(s), (c) nature of employment, (d) length of employment, and (e) description of your duties at previous employment.
8. Describe your training and educational history, including (a) schools you have attended, (b) degrees earned, (c) specialized schools attended, (d) reasons for leaving school from which you have not graduated, (e) trainings necessary to obtain your jobs at the Teaneck Police Department, and (f) any continued training.
9. List any prior involvements with the law including (a) arrests and/or convictions, and (b) disciplinary procedures.
10. Have you ever been involved in a prior or subsequent lawsuit, either personally or in your official capacity as a police officer involving (a) abuse of authority, (b) false arrest and/or malicious prosecution, and/or (c) violation of civil rights? If so, please provided the date(s) of these previous lawsuits, the name of suit, and result.

11. Have you ever been the subject of any administrative hearing? If so, please provide the date(s) of the administrative hearing(s) and the nature and substance of the disposition.
12. On the date of the incident, who was your immediate supervisor? Please set forth the name and address.
13. Describe your job responsibilities on the date of the incident complained of.
14. Did you have a partner on the date of the incident? If so, please set forth name and address.
15. Describe in detail what you understood your duty to be on the date of the incident. How do you know this? Who instructed you to do your duties?
16. Please provide a description of your recollection of the events that occurred on the date of the incident.
17. Please provide a description of the shoplifting suspect as described to you on the date of the incident.
18. Please provide a description of the Plaintiff as she appeared on the date of the incident.
19. If informed, please provide the (a) name and address of informant, (b) set forth the details of what the informant told you, and (c) where, when, and under what circumstances informant told you the incident took place.
20. Did the Plaintiff act in an unusual manner at the time you first observed her?
21. What caused you to first notice the Plaintiff?
22. Please describe any and all conversations that you had with the Plaintiff on the date of the incident, including whether the conversation(s) took place before or after the arrest.
23. At the time of the occurrence with Plaintiff, were you wearing a uniform? If yes, describe it. If no, describe what you were wearing.
24. Did you touch the Plaintiff in any manner? If so, please describe.
25. Did you see the Plaintiff conceal any merchandise? If yes, describe what you saw.

26. Were there eyewitnesses to the occurrence? If so, set forth name(s) and address(s).
27. Prior to this incident, have you ever seen the Plaintiff? If so, please describe date, place, and nature of encounter.
28. Were there any special instructions given with regard to the arrest of the Plaintiff? If so, please describe in detail the nature and substance of the instructions.
29. Did you arrest and/or detain the Plaintiff? If so, state how this was accomplished?
30. Was there a search performed of the Plaintiff's person, papers, or effects? If so, describe in detail the result of the search.
31. Did you advise Plaintiff of her rights? If so, set forth in detail what you said.
32. Were any statements made by the Plaintiff? If so, state in detail what Plaintiff said.
33. Immediately after arrest, what if anything did you do?
34. Were police called for additional backup? If so, please describe the details including (a) names and badge numbers, (b) the backup officers' duties at that time, and (c) any interaction you had with the officers.
35. Was Plaintiff at any time restrained during either the arrest or search of her person, papers, or effects? If so, describe the nature and substance of the restraining period of the Plaintiff.
36. Were any tests administered to the Plaintiff while in your custody or under the supervision of the policemen?
37. Was Plaintiff asked to sign any documents? If yes, identify those documents and attach true and complete copies hereto.
38. Did Plaintiff sign any of the aforementioned documents? If yes, describe the circumstances under which Plaintiff signed the documents. Please list any witnesses that saw Plaintiff sign documents.

39. Did Plaintiff appear injured on the date of the incident? If so, please describe the nature of the injury.
40. Did you prepare any memos, reports or records concerning this incident? If so, describe in detail what you prepared and attach true and complete copies.
41. Did anyone prepare memos, reports, or records concerning this incident that you signed? If yes, set forth true and complete copies of those documents.
42. Did you recover any property from Plaintiff? If so, describe in detail what you recovered and the packaging in which it was contained.
43. Where did you recover the aforementioned property?
44. After recovering the property, where did you place it?
45. Was Plaintiff incarcerated? If so, please describe the type of incarceration.
46. Was Plaintiff alone or with a group of people also incarcerated?
47. How long was she incarcerated?
48. Was she arraigned? If so, set forth the date, time, and place of arraignment? Also, state the name of the Judge and the part that she was arraigned for.
49. Please state the name(s) and badge number(s) of any and all police officers present at the time and occurrence of the arrest of the Plaintiff on March 22, 2016.
50. Please list of witnesses that may be called at trial. For each, please provide their (a) name, (b) address, (c) phone number, and (d) summary of the witness's knowledge of the events.
51. Please list of expert witnesses that may be called at trial. For each, please provide their (a) name, (b) address, (c) phone number, and (d) substance of the testimony of any and all expert witnesses.

CERTIFICATION

I hereby certify that the copies and reports annexed hereto, if any, are exact copies of the documents in my possession. I further certify that the documents annexed hereto are exact copies of the documents in my possession and that I have not altered, or caused to be altered, the originals. I am aware of the existence of other or ancillary documents not annexed hereto that would be responsive to the information sought herein.

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

Date: _____

David Ventoso, Esq. (187612020)
Bastarrika, Soto, Gonzalez & Somohano, LLP
3 Garret Mountain Plaza, Suite 302
Woodland Park, NJ 07424
Tel (973) 977-9919
Attorney(s) for Plaintiff

Gillian Ifill *as guardian ad litem* for Kelly Ifill, a
minor,

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Township of Teaneck, Township of Teaneck
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
BERGEN COUNTY
DOCKET NO.: BER-L-

REQUESTS FOR ADMISSION

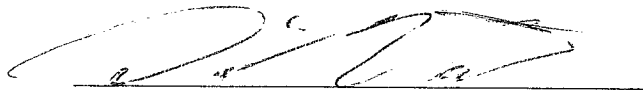
To: Juvenile Detective Ryland (#242)
Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

Juvenile Detective Pagan (#315)
Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

PLEASE TAKE NOTICE that in accordance with R. 4:10-1, R. 4:22-1, Plaintiff, Gillian Ifill *as guardian ad litem* for Kelly Ifill, a minor, by and through its counsel, David Ventoso, Esq. from the law firm of Bastarrika, Soto, Gonzalez & Somohano, LLP, hereby requests that Defendants, Juvenile Detective Ryland (#242) and Juvenile Detective Pagan (#315), make the following admissions for purposes of this action.

Bastarrika, Soto, Gonzalez, & Somohano, LLP.
Attorney for Plaintiff

Dated: June 2, 2020


David Ventoso, Esq.

Requests for Admission

1. I arrested K.I. (minor known as "Plaintiff") on March 22, 2016 (hereinafter referred to as the "date in question")

☐ Admit
☐ Deny

2. On the date in question, I received information that there was an alleged shoplifting at CVS located at 188 Cedar Lane, Teaneck, New Jersey 07666 (hereinafter referred to as the "CVS in Teaneck").

☐ Admit
☐ Deny

3. The manager at CVS in Teaneck described the suspect as black woman with a black hooded sweatshirt with a pink backpack.

☐ Admit
☐ Deny

4. The person that you arrested was a black thirteen (13) year-old girl wearing a navy parka with a fur lining on the hood and in possession of a black backpack with a pink zipper trimming.

☐ Admit
☐ Deny

5. A search of the Plaintiff backpack yielded negative results for the soda and chips allegedly shoplifted from the CVS in Teaneck.

☐ Admit
☐ Deny

6. While the search was conducted, the Plaintiff was placed inside a police vehicle.

☐ Admit
☐ Deny

7. I unlawfully arrested the Plaintiff without probable cause.

☐ Admit
☐ Deny

CERTIFICATION

I hereby certify that the copies and reports annexed hereto, if any, are exact copies of the documents in my possession. I further certify that the documents annexed hereto are exact copies of the documents in my possession and that I have not altered, or caused to be altered, the originals. I am aware of the existence of other or ancillary documents not annexed hereto that would be responsive to the information sought herein.

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

Date: _____

David Ventoso, Esq. (187612020)
Bastarrika, Soto, Gonzalez & Somohano, LLP
3 Garret Mountain Plaza, Suite 302
Woodland Park, NJ 07424
Tel (973) 977-9919
Attorney(s) for Plaintiffs, Jaime Gonzalez and Doris Gonzalez

Gillian Ifill *as guardian ad litem for Kelly Ifill, a minor,*

Plaintiff,

v.

Township of Teaneck, Township of Teaneck
Police Department, Juvenile Detective Ryland
(#242), and Juvenile Detective Pagan (#315),
John and Jane Does 1-10 (fictitious persons),
ABC and XYZ Corporations 1-10 (fictitious
entities),

Defendants.

SUPERIOR COURT OF NEW
JERSEY
LAW DIVISION
BERGEN COUNTY
DOCKET NO.: BER-L-

NOTICE TO PRODUCE DOCUMENTS

To: Township of Teaneck
818 Teaneck Road
Teaneck, New Jersey 07666

Juvenile Detective Ryland (#242)
Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

Juvenile Detective Pagan (#315)
Township of Teaneck Police Department
818 Teaneck Road
Teaneck, New Jersey 07666

PLEASE TAKE NOTICE that in accordance with the R. 4:18-1 of the Rules of Court, Plaintiff, Gillian Ifill *as guardian ad litem for Kelly Ifill, a minor*, hereby demand that Defendants, Township of Teaneck, Township of Teaneck Police Department, Juvenile Detective Ryland (#242), and Juvenile Detective Pagan (#315), produce the following to the office of Bastarrika, Soto, Gonzalez & Somohano, LLP, to the attention of David Ventoso, Esq., 3 Garret Mountain Plaza, Suite 302, Woodland Park, New Jersey 07424, within thirty-five (35) days of the date hereof:

1. A copy of any and all documents that you intend to use at trial in defense of this lawsuit.
2. A copy of any and all policies or employment manuals distributed to township of Teaneck police officers, which relate to their duties as police officers.
3. Copies of any and all proofs relating to a discrimination and harassment prevention protocol followed by the public employees, police officers, and other personnel of the township of Teaneck.
4. Copies of reports relating to the arrest of Plaintiff including but not limited to police reports, activity logs, police narratives, and other documents prepared in the regular course of business operations or practices of the Teaneck Police Department.
5. Copies of writings, books, records, documents, notes, reports, entries, communications, and incident reports *prior to* the occurrence complained of, including but not limited to the circumstances leading up to the arrest, the arrest and subsequent detention of Plaintiff.
6. Copies of writings, books, records, documents, notes, reports, entries, communications, and incident reports *subsequent to* the occurrence complained of, including but not limited to the circumstances leading up to the arrest, the arrest and subsequent detention of Plaintiff.
7. Copies of the investigation file leading to the arrest of the Plaintiff, including but not limited to tape recordings, video recordings, pictures and witness statements.
8. Copies of records and reports made as result of the investigation into the underlying arrest of the Plaintiff or, if no arrest, the incident in which Plaintiff was detained.
9. Copies of the complete memorandum book, entry made and maintained by Defendants, particularly the police officers, involved in and concerning the occurrence complained of.
10. Copies of any and all Plaintiff's statements including statements, recordings, abstracts, and/or writings taken by Defendant(s) individually or by the Defendant(s) attorneys, and/or agents from the Plaintiff with reference to the within litigation which are presently in the

possession of the Defendant(s), agents and/or employees. If any of the statements are oral, then the sum and substance of same, date, time and place of said statements.

11. Copies of the entire personnel file and jacket of each and every police officer involved in the occurrence complained of, including, but not limited to: Juvenile Detective Ryland (#242), Juvenile Detective Pagan (#315), Sergeant Forrest (#271), Officer Suarez (#320), and Officer Morena (#338).
12. Copies of the entire criminal file of Plaintiff including books, records, documents, writings and notes maintained in the ordinary course of business relating to the criminal case against Plaintiff.
13. Copies of any and all correspondences between either the parties or non-parties relating to the incident in this cause of action including but not limited to details of the incident, out-of-court settlement discussions, denials or approvals of liability, and other related communications.
14. Copies of any and all findings and decision of the civilian complaint review board (or other review board as same is appropriate to the facts of the case).
15. Copies of the entire contents (both oral, written and recorded) maintained in the ordinary course of business by the Civilian Complaint Review Board regarding the occurrences complained of, the police officers involved, and their findings, if any.
16. Copies of any and all photographs and diagrams, if any, taken by Defendants and original copies of same, if available. Color copies would be preferable.
17. Copies of results of all tests administered to Plaintiff (i.e. lie detector, blood, alcohol) by Defendant(s), agents, servants and/or employees or someone on their behalf.
18. Copies of a full and descriptive list from Plaintiff at the time of the arrest and incarceration.

19. Copies of a criminal conviction record search of all witnesses and the Plaintiff and the results of same.
20. Copies of any hospital, physician and other medical records of Plaintiff while in Defendants' custody.
21. Copies of sections of Police Manual, Administrative Guide, Patrol Guide, Student's Guide, Investigator's Guide or other guide book relating to procedures for making arrests and/or investigations of crime (i.e. shoplifting, etc.).
22. Copies of police bulletins, orders, special operating procedures in effect at the time the occurrence took place.

Bastarrika, Soto, Gonzalez, & Somohano, LLP.
Attorney for Plaintiff

A handwritten signature in black ink, appearing to read 'David Ventoso', is written over a horizontal line.

David Ventoso, Esq.

Dated: June 2, 2020

CERTIFICATION

I hereby certify that the copies and reports annexed hereto, if any, are exact copies of the documents in my possession. I further certify that the documents annexed hereto are exact copies of the documents in my possession and that I have not altered, or caused to be altered, the originals. I am aware of the existence of other or ancillary documents not annexed hereto that would be responsive to the information sought herein.

I certify that the foregoing statements and responses to the notices to produce documents are made by me and are true. I am aware that if any of the foregoing statements or answers made by me are willfully false, I am subject to punishment.

Date: _____