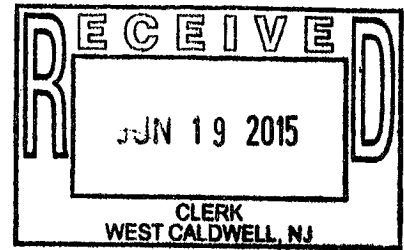


STARK & STARK, A Professional Corporation
Mailing Address: PO Box 5315, Princeton, NJ 08543
Office Location: 993 Lenox Drive, Lawrenceville, NJ 08648
(609) 896-9060

Mark W. Davis, Esq., Attorney ID#: 03420-1996
Attorneys for Plaintiffs



TRACY MARTIN and
GAIL MARTIN

Plaintiffs,

vs.

MICHAEL J. BRAMHALL, TOWNSHIP OF
WEST CALDWELL, WEST CALDWELL
POLICE DEPARTMENT and JOHN DOES 1-
10 (fictitious designations)

Defendants.

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY LAW DIVISION

Docket No. ESX-L-003745-15

**CIVIL ACTION
SUMMONS**

From The State of New Jersey to The Defendant Named Above: Township of West Caldwell

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 \$175.00 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.

STARK & STARK
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
MAILING ADDRESS
P.O. BOX 5315
PRINCETON, NJ 08543-5315

/s/ Michelle M. Smith
Clerk of the Superior Court

DATED: June 18, 2015

Name of Defendant to be served: Township of West Caldwell
Address of Defendant to be served: 30 Clinton Road, West Caldwell, NJ 07006

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division; Direct Filing
Atlantic County Civil Courthouse
1201 Bacharach Blvd., 1st Floor
Atlantic City, NJ 08401
LAWYER REFERRAL
609-345-3444
LEGAL SERVICES
609-348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Case Processing Section, Room 119
Justice Center, 10 Main St.
Hackensack, NJ 07601-0769
LAWYER REFERRAL
201-488-0044
LEGAL SERVICES
201-487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attention: Judicial Intake
1st Floor, Courts Facility
49 Rancocas Road
Mount Holly, NJ 08060
LAWYER REFERRAL
609-261-4862
LEGAL SERVICES
800-496-4570

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
1st Floor, Hall of Justice
101 S. 5th Street
Camden, NJ 08103
LAWYER REFERRAL
856-964-4320
LEGAL SERVICES
856-964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Box DN-209
Cape May Court House, NJ 08210
LAWYER REFERRAL
609-463-0313
LEGAL SERVICES
609-465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Broad & Fayette Sts., P.O. Box 615
Bridgeton, NJ 08302
LAWYER REFERRAL
856-692-6207
LEGAL SERVICES
856-451-0003

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Broad & Fayette Sts., P.O. Box 615
Bridgeton, NJ 08302
LAWYER REFERRAL
856-692-6207
LEGAL SERVICES
856-451-0003

ESSEX COUNTY:

Deputy Clerk of the Superior Court
50 W. Market St., Room 131
Newark, NJ 07102
LAWYER REFERRAL
973-622-6207
LEGAL SERVICES
973-624-4300

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Floor, Court House
1 N. Broad St., P.O. Box 129
Woodbury, NJ 08096
LAWYER REFERRAL
856-848-4589
LEGAL SERVICES
856-848-5360

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House - 1st Floor
583 Newark Ave.
Jersey City, NJ 07306
LAWYER REFERRAL
201-798-2727
LEGAL SERVICES
201-792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Ave.
Flomington, NJ 08822
LAWYER REFERRAL
908-263-6109
LEGAL SERVICES
908-782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad St., P.O. Box 8068
Trenton, NJ 08650-0068
LAWYER REFERRAL
609-383-6200
LEGAL SERVICES
609-693-6249

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court
Administration Building
Third Floor
1 Kennedy Sq., P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
732-828-0053
LEGAL SERVICES
732-249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
71 Monument Pl.
P.O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
732-431-5544
LEGAL SERVICES
732-866-0020

MORRIS COUNTY:

Deputy Clerk of the Superior Court
Civil Division
30 Schuyler Pl., P.O. Box 910
Morristown, NJ 07960-0910
LAWYER REFERRAL
973-267-5882
LEGAL SERVICES
973-285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754
LAWYER REFERRAL
973-240-3666
LEGAL SERVICES
732-341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07305
LAWYER REFERRAL
973-276-9223
LEGAL SERVICES
973-523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
92 Market St., P.O. Box 18
Salem, NJ 08079
LAWYER REFERRAL
856-676-8363
LEGAL SERVICES
856-451-0003

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
New Court House, 3rd Floor
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
908-685-2323
LEGAL SERVICES
908-231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
973-267-3882
LEGAL SERVICES
973-383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-6073
LAWYER REFERRAL
908-353-4713
LEGAL SERVICES
908-354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500
LAWYER REFERRAL
973-267-3882
LEGAL SERVICES
973-475-2010

ESSEX COUNTY - CIVIL DIVISION
SUPERIOR COURT OF NJ
465 MARTIN LUTHER KING JR BLVD
NEWARK NJ 07102

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 693-5529
COURT HOURS 8:30 AM - 4:30 PM

DATE: JUNE 03, 2015
RE: MARTIN VS BRAMWALL
DOCKET: ESX 1 -003745 15

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON MICHELLE HOLLAR-GREGORY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (973) 693-6462 EXT 6528.

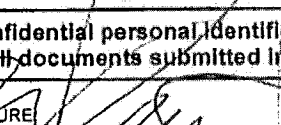
IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

STARK & STARK
993 LENOX DRIVE
BUILDING 2
LAURENCEVILLE NJ 08648

JUGWIL3

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY PAYMENT TYPE: ☐ CK ☐ CG ☐ CA CHG/CK NO. _____ AMOUNT: _____ OVERPAYMENT: _____ BATCH NUMBER: _____			
	ATTORNEY / PRO SE NAME Mark W. Davis, Esquire		TELEPHONE NUMBER (609) 896-9060		COUNTY OF VENUE Essex	
	FIRM NAME (if applicable) Stark & Stark, A Professional Corporation		DOCKET NUMBER (when available) L-3745-15		DOCUMENT TYPE Complaint	
	OFFICE ADDRESS 993 Lenox Drive, Building Two Lawrenceville, NJ 08648		JURY DEMAND ☒ Yes ☐ No			
NAME OF PARTY (e.g., John Doe, Plaintiff) Tracy Martin, Plaintiff Gail Martin, Plaintiff			CAPTION Tracy Martin and Gail Martin v. Michael Bramhall, Township of West Caldwell, West Caldwell Police Department			
CASE TYPE NUMBER (See reverse side for listing) 603Y		HURRICANE SANDY RELATED? ☐ YES ☒ NO		IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? ☐ Yes ☒ No		IF YES, LIST DOCKET NUMBERS				
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? ☐ Yes ☒ No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) Inservco Insurance Services, Inc. ☐ NONE ☐ UNKNOWN				
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.						
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION						
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? ☐ Yes ☒ No		IF YES, IS THAT RELATIONSHIP: ☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) ☐ FAMILIAL ☐ BUSINESS				
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? ☐ Yes ☒ No						
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION						
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? ☐ Yes ☒ No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION				
WILL AN INTERPRETER BE NEEDED? ☐ Yes ☒ No		IF YES, FOR WHAT LANGUAGE?				
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 <i>Rule 1:38-7(b)</i> .						
ATTORNEY SIGNATURE 						



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 288 PRUDENTIAL TORT LITIGATION |
| 271 ACCUTANE/ISOTRETINOIN | 289 REGLAN |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 278 ZOMETHA/AREXIA | 291 PELVIC MESH/GYNECARE |
| 279 GADOLINIUM | 292 PELVIC MESH/BARD |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 282 FOSAMAX | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 284 NUVARING | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 601 ASBESTOS |
| 287 YAZ/YASMIN/OCELLA | 623 PROPECIA |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

STARK & STARK
A Professional Corporation
Attorneys at Law
Princeton Pike Corporate Center
993 Lenox Drive, Building 2
P.O. Box 5315
Princeton, New Jersey 08543-5315
(609) 896-9060
Attorneys for Plaintiffs
By: Mark W. Davis, Esquire (03420-1996)

TRACY MARTIN and
GAIL MARTIN

Plaintiffs

vs.

MICHAEL BRAMHALL, TOWNSHIP OF
WEST CALDWELL, WEST CALDWELL
POLICE DEPARTMENT and JOHN DOES
1-10 (fictitious designations)

Defendants

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY
LAW DIVISION

Docket No. *L-374575*

CIVIL ACTION

COMPLAINT AND JURY DEMAND

**DEMAND FOR ANSWERS TO
INTERROGATORIES**

Plaintiffs, TRACY MARTIN and GAIL MARTIN, residing in the Township of North
Caldwell, County of Essex, and State of New Jersey, by way of Complaint, say:

FIRST COUNT

1. On or about August 9, 2014, Plaintiff, TRACY MARTIN, was operating his bicycle
along the right side of the roadway on Bloomfield Avenue, near its intersection with Personette
Street, in the Township of Caldwell, County of Essex, and State of New Jersey.

2. At or about the same time and place, Defendant, WEST CALDWELL POLICE DEPARTMENT, was the owner of a motor vehicle which was being operated by Defendant, MICHAEL BRAMHALL, as agent, servant, and/or employee of Defendants, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT, and/or Defendant, JOHN DOES 1-10 (fictitious designations), and/or otherwise with the knowledge, consent and/or permission of Defendants, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT, and/or Defendant, JOHN DOES 1-10 (fictitious designations).

3. At present, the identities of Defendants, JOHN DOES 1-10, is unknown. As such, "JOHN DOES 1-10", is a fictitious designation, 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 all times material, Defendant, MICHAEL BRAMHALL, had parked the aforesaid vehicle on the side of the roadway and proceeded to open the door to same, suddenly and without first fully or properly looking for approaching cyclists, and in so doing, violated Plaintiff, TRACY MARTIN's right-of-way and caused a collision.

5. At all times material hereto, Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT and/or JOHN DOES 1-10 (fictitious designations), were careless and negligent with regard to the ownership, operation, maintenance, and/or entrustment of their motor vehicle(s), which caused the aforesaid collision.

6. As a direct and proximate result of the carelessness, recklessness, and negligence of the Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT and/or JOHN DOES 1-10 (fictitious designations),

as aforesaid, and their disregard for the safety of others, Plaintiff, TRACY MARTIN, was caused to suffer severe bodily injuries, some or all of which are permanent in nature; has been caused to aggravate any pre-existing medical condition, symptomatic 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; and, has been caused and will be caused to lose large sums of money due to his inability to pursue his usual occupation.

WHEREFORE, Plaintiff, TRACY MARTIN, demands Judgment for damages generally against the Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT and JOHN DOES 1-10 (fictitious designations), individually, jointly, severally, or in the alternative, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff, GAIL MARTIN, is the wife of Plaintiff, TRACY MARTIN.

2. Plaintiff, GAIL MARTIN, repeats all of the Paragraphs of the First Count of this Complaint and makes them a part hereof.

3. As a further direct and proximate result of the carelessness, recklessness, and negligence of the Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT and/or JOHN DOES 1-10 (fictitious designations), and their disregard for the safety of others, Plaintiff, GAIL MARTIN, has been caused and will be caused to lose the services of her dear husband, and has been caused and will be caused to suffer loss of consortium.

WHEREFORE, Plaintiff, GAIL MARTIN, demands Judgment for damages generally against the Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT and JOHN DOES 1-10 (fictitious designations), individually, jointly, severally, or in the alternative, together with interest and costs of suit.

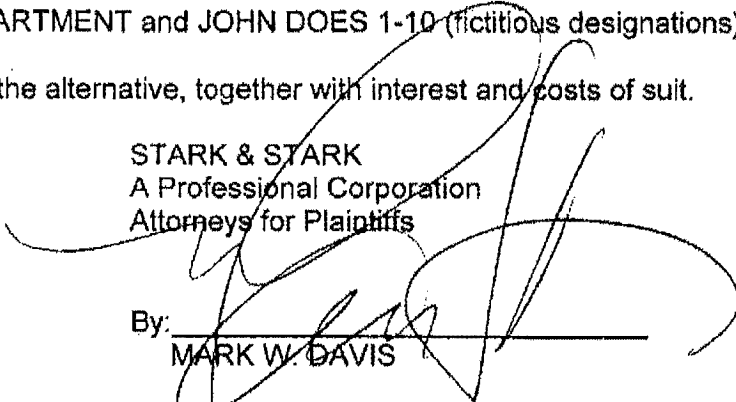
THIRD COUNT

1. Plaintiff, TRACY MARTIN, repeats all of the Paragraphs of the First Count of this Complaint and makes them a part hereof.

2. As a further direct and proximate result of the carelessness, recklessness, and negligence of the Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT and/or JOHN DOES 1-10 (fictitious designations), and their disregard for the safety of others, Plaintiff's bicycle and cycling gear was severely damaged, required extensive repairs, was depreciated in value and Plaintiff lost use of same.

WHEREFORE, Plaintiff, TRACY MARTIN, demands Judgment for damages according to proof, against the Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL, WEST CALDWELL POLICE DEPARTMENT and 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 Plaintiffs

By: 
MARK W. DAVIS

JURY DEMAND

Plaintiffs, TRACY MARTIN and GAIL MARTIN, 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.

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

Pursuant to Rule 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 MARK W. DAVIS is hereby designated as trial counsel.

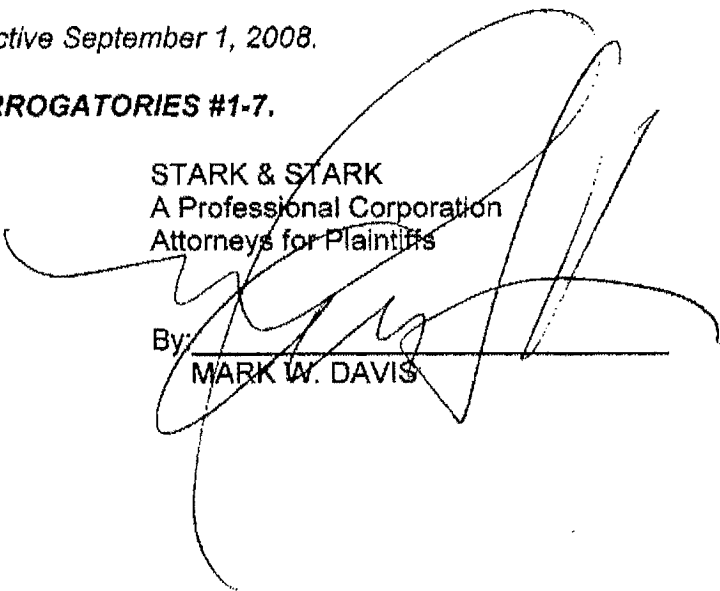
DEMAND FOR ANSWERS TO INTERROGATORIES
& SUPPLEMENTAL INTERROGATORIES

Plaintiffs, TRACY MARTIN and GAIL MARTIN, demand that Defendants, MICHAEL BRAMHALL, TOWNSHIP OF WEST CALDWELL and WEST CALDWELL POLICE DEPARTMENT, 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 effective September 1, 2008.

SUPPLEMENTAL INTERROGATORIES #1-7.

STARK & STARK
A Professional Corporation
Attorneys for Plaintiffs

By: 

MARK W. DAVIS

Dated:

5-22-15

STARK & STARK
A Professional Corporation
Attorneys at Law
Princeton Pike Corporate Center
993 Lenox Drive, Building 2
P.O. Box 5315
Princeton, New Jersey 08543-5315
(609) 896-9060
Attorneys for Plaintiffs
By: Mark W. Davis, Esquire (03420-1996)

TRACY MARTIN and
GAIL MARTIN

Plaintiffs

vs.

MICHAEL BRAMHALL, TOWNSHIP OF
WEST CALDWELL, WEST CALDWELL
POLICE DEPARTMENT and JOHN DOES
1-10 (fictitious designations)

Defendants

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY
LAW DIVISION

Docket No.

CIVIL ACTION

DEMAND FOR DISCOVERY
OF INSURANCE COVERAGE

TO: MICHAEL BRAMHALL
TOWNSHIP OF WEST CALDWELL
WEST CALDWELL POLICE DEPARTMENT

Pursuant to Rule 4:10-2(b) demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

YES () NO ()

If the answer is "yes" attach a copy of each or in the alternative state, under oath or certification (a) number (b) name and address of insurer or issuer (c) inception of expiration dates (d) names and addresses of all persons insured thereunder (e) personal injury limits (f) property damage limits (g) medical payment limits (h) name and address of person who has custody and possession thereof (i) where and when each policy or agreement can be inspected and copied.

Dated:

STARK & STARK
A Professional Corporation
Attorneys at Law
Princeton Pike Corporate Center
I-295 and Princeton Pike
P.O. Box 5315
Princeton, New Jersey 08543-5315
(609) 896-9060
Attorneys for Plaintiffs
By: Mark W. Davis, Esquire (03420-1996)

TRACY MARTIN and
GAIL MARTIN

Plaintiffs

vs.

MICHAEL BRAMHALL, TOWNSHIP OF
WEST CALDWELL, WEST CALDWELL
POLICE DEPARTMENT and JOHN DOES
1-10 (fictitious designations)

Defendants

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY
LAW DIVISION

Docket No.

CIVIL ACTION

NOTICE TO PRODUCE

TO: MICHAEL BRAMHALL
TOWNSHIP OF WEST CALDWELL
WEST CALDWELL POLICE DEPARTMENT

Pursuant to Rule 4:18-1, plaintiffs hereby request that the defendants produce the following documents within the time prescribed by the Court Rules:

1. If you allege any of the injuries plaintiff contends were caused by the incident in issue were not caused by incident/accident, please produce the following documents:

a) All medical reports and documents upon which you rely;

b) Copies of any and all pleadings, interrogatories, depositions or trial transcripts or any other records upon which you will rely.

2. If you allege the plaintiff has been involved in any previous or subsequent accidents or incidents or sustained any previous or subsequent injuries to those in question, please produce the following:

a) Copies of all medical reports and documents upon which you will rely;

b) Copies of any pleading, interrogatory, deposition, trial testimony or any other records upon which you will rely.

3. If you intend to utilize a seat belt defense please produce a copy of your expert's report including but not limited to, all raw data, all calculations, all computer programs, all engineering studies said expert's curriculum vitae, any and all standards and all treatises upon which said expert will rely.

4. If you intend to cross-examine any of the plaintiff's experts by use of any medical or scientific treatises or any treatises please attach copies of said documents.

5. Please attach copies of any photographs, videos, surveillance films, audio tapes or any other pictures, whether still or moving regarding any aspect of the happening of the accident or of the injuries and disabilities incurred by the plaintiff.

6. If you allege the plaintiff made any written admissions or declarations against interest as to the happening of the accident or the injuries sustained in the accident, please produce copies of any document containing such admissions or declarations against interest.

7. Please produce the following in regard to any surveillance conducted of the Plaintiff:

a) Any and all logs, notes, audio tapes, invoices, billing receipts or documents that were kept concerning the filming of the videotapes or other surveillance that did not result in videotape.

b) A list of all teams, members and other personnel involved in the filming of the videotapes along with the times those individuals were involved in the taping, the location of those individuals were involved in the taping, the location of those individuals at the time of the taping and what, if anything, those individuals were instructed to observe.

c) A list of all people involved in the editing and/or copying, and/or transferring of the videotapes along with the times they worked on said videotapes and a detailed description of what they edited to include:

- i) Portions of original tape removed;
- ii) Voice-overs;
- iii) Portions of the tape clarified;
- iv) Any other editing job performed by these individuals.

d) A list of all people speaking on the tapes and what times those people were present for filming or editing.

e) A description of what is contained on the videotapes.

f) An explanation of what is contained on the videotapes.

g) A detailed explanation of what the defendant claims is shown by the videotapes.

h) A labeled set of videotapes with each tape marked as to its contents.

i) A list of all people associated with the filming, editing, production, viewing, delivery and otherwise involved in any manner with the videotapes and when each person was involved with said tapes and what they did with or to said tapes.

j) A list of all the equipment used in the filming of the videotapes including the model numbers of such equipment.

k) All correspondence regarding the videotaped surveillance and any other surveillance which may have resulted in videotape.

l) All still photographs.

8. If you allege that any of the plaintiff's medical treatment was unnecessary, unreasonable or not related to the accident/incident forming the basis of this complaint, please attach copies of all documentation upon which you will rely to support this allegation.

9. If plaintiff is asserting a loss wage claim and you allege that the plaintiff was not disabled for any of the period of time claimed, please attach copies of any documentation upon which your allegation is based.

10. If you allege that plaintiff had any pre-existing medical condition please attach copies of any medical records or any other documentation upon which you intend to rely to support this allegation.

11. Please attach copies of all defense medical examinations.

12. Please attach copies of any medical examinations performed at the request of any person or entity not a party to this matter.

13. Please produce copies of any and all documents received from any subpoena or authorizations served in this matter.

14. Please attach copies of all written witness statements.

15. Please produce copies of any and all statements taken from any of your employees as a result of this accident.

16. Please produce copies of all statements taken by you, or anyone acting on your behalf or by any party to this action regarding the happening of this accident.

17. Please attach copies of any reports made to anyone concerning the incident which is the subject matter of this suit.

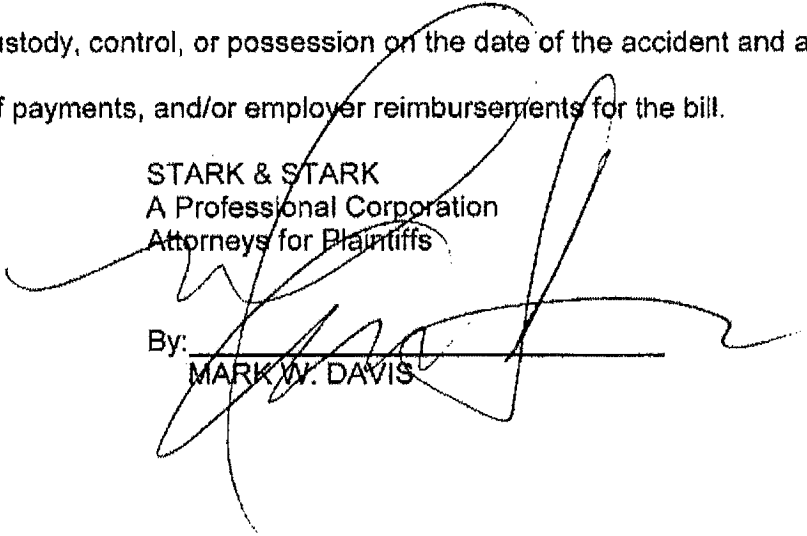
18. If you allege that this accident was caused in part or in whole by any mechanical failure or defect of any of the vehicles involved in the accident please attach copies of all said documentation supporting said allegation.

19. Please attach a copy of your cellular telephone records for each cellular telephone in your custody, control, or possession on the date of the accident, including, but not limited to, the following:

- a) Records of all incoming and outgoing calls, including, but not limited to, the start and end times of each call;
- b) Records of all incoming and outgoing text messages, including, but not limited to, the send and receive times of each text message;
- c) Records of all incoming and outgoing e-mails, including, but not limited to, the send and receive times of each e-mail; and
- d) The name and description of your rate plan, including, but not limited to, call, data, and text message plans.

20. Please attach a copy of the billing records that include the date of the accident for each cellular telephone in your custody, control, or possession on the date of the accident and a copy of any payments, receipts of payments, and/or employer reimbursements for the bill.

STARK & STARK
A Professional Corporation
Attorneys for Plaintiffs

By: 

MARK W. DAVIS

Dated: 5-22-15

SUPPLEMENTAL AUTO INTERROGATORIES

1. With respect to the collision referred to in the complaint, please state whether or not the operator of defendant's motor vehicle was operating the motor vehicle as the agent, servant or employee of any other person, party or entity. If so, please state the name and address of said person, party or entity.
2. State in terms of feet, the distance between your vehicle and plaintiff at the time you first observed the plaintiff.
3. Please state, in detail, all actions taken by you to verify the area was clear and it was safe to open your door before you proceeded to open same.
4. With regard to the operator of the vehicle involved, either owned or operated by you at the time of the accident, please state whether that person suffered from any physical or mental impairment at the time of the accident and if so, the nature and description of said impairment.

5. Were there any obstructions or impediments at or near the scene of the accident that interfered with the visual observations of any of the drivers involved in the alleged accident?
6. Please list cellular telephone numbers, provider names, and account numbers for every cellular telephone in the custody, control, or possession of the driver on the date of the accident.
7. If any of the parties have ever been convicted of a crime or disorderly person violation, please state the nature of said crime or violation and the date of said conviction.

CERTIFICATION

I hereby certify that the copies of the reports annexed hereto rendered by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

I acknowledge my continuing responsibility to amend or supplement these answers as facts or information become known by my representative or me.

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.

Print Name

Signature

Dated: