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ATTORNEY FOR PLAINTIFF(S)
OUR FILE NO: 29927

RECEIVED and FILED
SUPERIOR COURT OF NEW JERSEY
NOV - 3 2017
PASSAIC COUNTY

GERALD CAHILL and his wife
MELISSA CAHILL,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: PASSAIC COUNTY
DOCKET NO: PAS-L-3211-15

Plaintiff(s)

CIVIL ACTION

vs.

MATTHEW KENT, BOROUGH OF
ALPINE, ALPINE POLICE DEPARTMENT,
JOHN DOE (1-5), a fictitious name for a
person unknown, XYZ Corp. (6-10), a fictitious
name for a corporation unknown,

STIPULATION OF DISMISSAL
WITH PREJUDICE

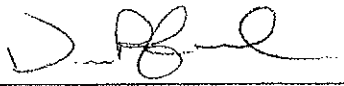
Defendant(s)

THE MATTER in difference in the entitled action having been amicably resolved by and between the parties, it is hereby stipulated and agreed that the same be and it is hereby dismissed with prejudice.

DATED: October 4, 2017

PFUND McDONALD, P.C.
Attorney for Defendant(s)
Matthew Kent, Borough of Alpine
and Alpine Police Dept.

SELLINGER & SELLINGER
Attorney for Plaintiff(s),
Gerald Cahill and Melissa Cahill

By: 

DAVID T. PFUND

By: 

TIMOTHY S. SELLINGER

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RECEIVED & FILED
SUPERIOR COURT OF NEW JERSEY
SEP 17 2015
PASSAIC COUNTY

GERALD CAHILL and his wife
MELISSA CAHILL

Plaintiff(s)

vs.

MATTHEW KENT
BOROUGH OF ALPINE
ALPINE POLICE DEPARTMENT
JOHN DOE (1-5), a fictitious name for a person
unknown and XYZ CORP. (6-10) a fictitious name
for a corporation unknown

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: PASSAIC COUNTY
DOCKET NO.: PAS-L-

3211-15

Civil Action

COMPLAINT
JURY DEMAND AND VERBAL
THRESHOLD CERTIFICATION

Plaintiff(s), Gerald Cahill and Melissa Cahill residing at [REDACTED]

[REDACTED] and State of New Jersey complaining of the defendant(s) says:

FIRST COUNT

1. On or about 10/23/2013, the plaintiff, Gerald Cahill was a driver of a motor vehicle in the City of Paterson, County of Passaic and State of New Jersey.
2. At the same time and place, the defendant, Borough of Alpine and/or Alpine Police Department was the owner of a motor vehicle which was maintained, controlled, repaired and operated in such a careless and negligent manner so as to cause a collision. At the same time and place the defendant, Matthew Kent individually, and as agent, servant and/or employee of the defendant, Borough of Alpine and/or Alpine Police Department operated said motor vehicle in such a careless and negligent manner so as to cause a collision.
3. Plaintiff has complied with all provisions of the New Jersey Tort Claim Act.
4. At the same time and place, the defendant, XYZ Corp. (6-10), a fictitious name for a corporation unknown was the owner of a motor vehicle which was maintained, controlled, repaired and operated in such a careless and negligent manner so as to cause a collision.

At the same time and place the defendant, John Doe (1-5), a fictitious name for a person unknown, individually and as agent, servant and/or employee of said defendant, operated said motor vehicle in such a careless and negligent manner so as to cause a collision.

5. As a result of the negligence of the defendant(s), aforesaid Plaintiff, Gerald Cahill, sustained severe personal and permanent injuries, suffered great pain and was compelled to undergo medical treatment.

WHEREFORE, plaintiff demands judgment against the defendant(s) on this Count together with interest and cost of suit.

SECOND COUNT

1. Plaintiff, Gerald Cahill, repeats and makes a part hereof all of the allegations contained in the preceding Count of the Complaint.
2. As a result thereof aforesaid plaintiff sustained severe personal injuries, suffered great pain and was/were compelled to undergo medical treatment and was caused to incur medical and hospital expenses and lost wages.

WHEREFORE, plaintiff demands judgment on this Count together with interest and cost of suit.

THIRD COUNT

1. The plaintiff, Melissa Cahill is the lawful wife of the plaintiff, Gerald Cahill.
2. The allegations of Count One are hereby repeated and made a part of this Count.
3. As a result thereof, the plaintiff, Melissa Cahill lost the society, services and companionship of her husband, plaintiff, Gerald Cahill.

WHEREFORE, plaintiff, Melissa Cahill demands judgment against the defendants on this Count together with interest and cost of suit.

CERTIFICATION

As required by the Automobile Cost Reduction Act plaintiff is not covered by the Verbal Threshold for any claims asserted herein.

TRIAL COUNSEL DESIGNATION

Plaintiff, hereby designates James G. Sellinger as trial counsel for all claims asserted herein.

JURY DEMAND

Plaintiff(s), herein demand trial by jury on all issues.

Sellinger & Sellinger, P.A.
Attorney for Plaintiff(s)

Dated: September 15, 2015

/S/ TIMOTHY S. SELLINGER
By: Timothy S. Sellinger

CERTIFICATION

I hereby certify that to the best of my knowledge the matter in controversy is not the subject of any other action pending in any court or arbitration proceeding, and no action or arbitration proceeding is contemplated. I am not aware of any non-party who should be joined pursuant to R4:28 and/or R:29-1(B).

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

Dated: September 15, 2015

/S/ TIMOTHY S. SELLINGER
TIMOTHY S. SELLINGER
Attorney for Plaintiff(s)