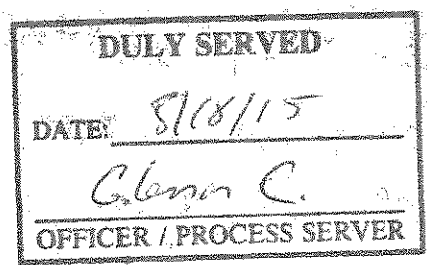


Arthur J. Murray, Esquire (Attorney ID No. 013901995)
JACOBS & BARBONE, P.A.
A Professional Corporation
Attorneys at Law
1125 Pacific Avenue
Atlantic City, New Jersey 08401
(609)348-1125
Attorneys for Plaintiff



LAUREN PLACA and CHARLES PLACA, Plaintiff, v. BOROUGH OF BRADLEY BEACH, CHIEF OF POLICE LEONARD GUIDA, SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAN STEPHEN FAHNHOLZ, and JOHN DOES (#1-#100), fictitious names, jointly, severally and/or in the alternative, Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MONMOUTH COUNTY Docket No. MON-L- 597-15 Civil Action SUMMONS
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From the State of New Jersey

To the Defendant(s) Named Above: City Hall, Clerk's Office
Borough of Bradley Beach
Municipal Building, 701 Main Street
Bradley Beach, New Jersey 07720

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. (The address of each deputy clerk of the Superior Court is provided.) 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 \$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 statewide hotline number at 1-888-LSNJ-LAW (1-888-576-5529) or the Legal Services office in the county where you live. A list of these offices is provided. 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 list of these numbers is also provided.

Jennifer M. Perez
Jennifer M. Perez, Acting Clerk

Dated: February 26, 2015

Name of Defendant to be served:	City Hall, Clerk's Office
Address of Defendant to be served:	Municipal Building, 701 Main Street Bradley Borough, NJ 07720

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Boulevard, First Flr
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 Street
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
Attn: Judicial Intake
First Floor, Courts Facility
49 Rancocas Road
Mt. 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 Records
101 S. Fifth Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 964-4520

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 Streets, 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 West Market Street
Room 131
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6207

LEGAL SERVICES

(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Floor, Court House
1 North Broad Street, P.O. Box 750
Woodbury, NJ 08096

LAWYER REFERRAL

(856) 848-4589

LEGAL SERVICES

(856) 848-5360

HUDSON COUNTY:

LAWYER REFERRAL

Deputy Clerk of the Superior Court
Superior Court - Civil Records Dept.
Brennan Court House - 1st Floor
583 Newark Avenue
Jersey City, NJ 07306

(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY
Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, 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 Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY
Deputy Clerk of the Superior Court
Administration Building
Third Floor
1 Kennedy Square, P.L. 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 Park
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
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:
Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY
Deputy Clerk of the Superior Court
92 Market Street
P.O. Box 18
Salem, NJ 08079

LAWYER REFERRAL
(856) 678-8363
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) 267-5882
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) 353-4715
LEGAL SERVICES
(908) 354-4340

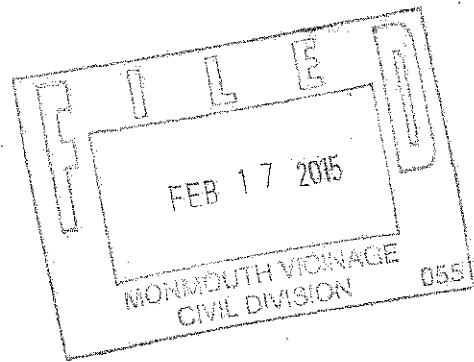
WARREN COUNTY

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL

(908) 387-1835
LEGAL SERVICES
(908) 475-2010

Arthur J. Murray, Esquire (NJ Attorney ID No. 013901995)
JACOBS & BARBONE, P.A.
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Atlantic City, N.J. 08401
(609) 348-1125
jacobsbarbone@comcast.net
Attorneys for Plaintiffs



LAUREN PLACA and CHARLES PLACA,

Plaintiffs

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MONMOUTH COUNTY

DOCKET NO. MON-L-⁵⁹⁷-15

v.

Civil Action

BOROUGH OF BRADLEY BEACH,
CHIEF OF POLICE LEONARD GUIDA,
SERGEANT MICHAEL RICCIARDI,
SERGEANT EDWARD SCOTT, CAPTAIN
STEPHEN FAHNHOLZ, and JOHN DOES
(#1-#100), fictitious names, jointly,
severally and/or in the alternative,

Defendants.

COMPLAINT AND JURY DEMAND

Plaintiffs LAUREN PLACA and CHARLES PLACA, residents of the State of Ohio,
by way of complaint against Defendants, state:

1. The causes of action alleged seek to redress deprivation under color of law, policy and custom, of rights secured by the New Jersey Constitution, and the statutory and common laws of the State of New Jersey. No aspect of this claim seeks redress under the Federal Constitution or the statutes of the United States of America.

2. Plaintiffs LAUREN PLACA and CHARLES PLACA, were, at all times relevant hereto, residents of the State of Ohio and citizens of the United States of America.
3. At any and all times herein mentioned, Defendant BOROUGH OF BRADLEY BEACH is the entity responsible for the operation of governmental services within its territorial jurisdiction, and Defendant BOROUGH OF BRADLEY BEACH is duly incorporated under the laws of the State of New Jersey. At all relevant times hereto, it employed Defendants CHIEF OF POLICE LEONARD GUIDA, SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and John Doe Police Officers (1-100).
4. At any and all times herein mentioned, Defendant CHIEF OF POLICE LEONARD GUIDA was a police officer of the BOROUGH OF BRADLEY BEACH with the rank of Chief, was citizen of the State of New Jersey, acting in his capacity as the agent, servant, employee, officer, representative, and/or appointee of Defendant BOROUGH OF BRADLEY BEACH. Defendant CHIEF OF POLICE LEONARD GUIDA is sued individually and in his official capacity.
5. At any and all times herein mentioned, Defendant MICHAEL RICCIARDI was a police officer of the BOROUGH OF BRADLEY BEACH with the rank of Sergeant, was citizen of the State of New Jersey, acting in his capacity as the agent, servant, employee, officer, representative, and/or appointee of Defendant BOROUGH OF BRADLEY BEACH. Defendant

SERGEANT MICHAEL RICCIARDI is sued individually and in his official capacity.

6. At any and all times herein mentioned, Defendant EDWARD SCOTT was a police officer of the BOROUGH OF BRADLEY BEACH with the rank of Sergeant, was citizen of the State of New Jersey, acting in his capacity as the agent, servant, employee, officer, representative, and/or appointee of Defendant BOROUGH OF BRADLEY BEACH. Defendant SERGEANT EDWARD SCOTT is sued individually and in his official capacity.
7. At any and all times herein mentioned, Defendant STEPHEN FAHNHOLZ was a police officer of the BOROUGH OF BRADLEY BEACH with the rank of captain, was citizen of the State of New Jersey, acting in his capacity as the agent, servant, employee, officer, representative, and/or appointee of Defendant BOROUGH OF BRADLEY BEACH. Defendant CAPTAIN STEPHEN FAHNHOLZ is sued individually and in his official capacity.
8. At any and all times herein mentioned, Defendants John Doe Police Officers (1-100) were citizens of the State of New Jersey and officers, Sergeants, Lieutenants and/or Captains in the Police Department of Defendant BOROUGH OF BRADLEY BEACH or other law enforcement agencies, acting in such capacity as the agents, servants, employees, officers, representatives and/or appointees of Defendant BOROUGH OF BRADLEY BEACH or other law enforcement agencies. Defendants John

Doe Police Officers (1-100) are sued individually and in their official capacity.

9. On or about July 29, 2013, Defendant SERGEANT MICHAEL RICCIARDI with malice aforethought, swore out certain complaints against Plaintiff CHARLES PLACA, alleging that on July 29, 2013 he violated N.J.S.A. 2C:33-2A(1), N.J.S.A. 2C:17-3A(1), and N.J.S.A. 2C:18-3B(2).
10. At the time he swore out the aforementioned complaints, Defendant SERGEANT MICHAEL RICCIARDI lacked the requisite probable cause required of a reasonable police officer before doing so.
11. Following trial in the Municipal Court, Plaintiff CHARLES PLACA was found not guilty of two of the three charges against him and guilty of the third charge on or about August 20, 2014.
12. On or about December 12, 2014, following a *de novo* trial before the Honorable Francis J. Vernoia, P.J.Cr., Plaintiff CHARLES PLACA was found not guilty of the one charge on which he had been previously convicted in Municipal Court.
13. On or about October 25, 2013, Plaintiff CHARLES PLACA, filed the requisite Tort Claim Notice and the requisite amount of time to allow Plaintiff CHARLES PLACA, to file suit has since lapsed. To the extent Defendants may argue the original Tort Claim Notice was not ripe on the tort of malicious prosecution, a second Tort Claim Notice has been recently filed within 90 days of December 12, 2014.

14. As a result of the aforementioned actions, Plaintiff CHARLES PLACA was damaged.
15. The aforementioned conduct of Defendant SERGEANT MICHAEL RICCIARDI constituted malicious prosecution under the laws of the State of New Jersey.

WHEREFORE, Plaintiff CHARLES PLACA, demands judgment against Defendant SERGEANT MICHAEL RICCIARDI for:

- a. Compensatory damages;
- b. Punitive damages;
- c. Any other relief the Court deems equitable and just.

COUNT TWO

1. Plaintiff repeats and incorporates the allegations contained in Count One as if fully set forth herein at length.
2. On July 29, 2013, Plaintiff CHARLES PLACA along with his wife and handicapped daughter, Plaintiff LAUREN PLACA, were vacationing in Bradley Beach, New Jersey.
3. All Handicapped Access to the beach was locked.
4. At this time Plaintiff CHARLES PLACA voiced his displeasure to several employees of Defendant BOROUGH OF BRADLEY BEACH that the HANDICAPPED ACCESS to the beach was locked in violation of his understanding of the law.

5. Plaintiff CHARLES PLACA was told that the key to unlock the locked Handicapped Access to the beach was located inside a certain booth and that he should obtain the key from said booth.
6. Upon entering said booth, Plaintiff CHARLES PLACA was told he was not allowed to be in same at which time he conveyed the conversation he had just had with another employee where he was given explicit permission to enter said booth.
7. At that time, Plaintiff CHARLES PLACA was finally given the key, used it to unlock the previously locked Handicapped Access, and entered the beach with his wife and handicapped daughter.
8. A short time later, multiple municipal police officers employed by Defendant BOUROUGH OF BRADLEY BEACH, who Plaintiff CHARLES PLACA eventually learned were Defendants CHIEF OF POLICE LEONARD GUIDA, SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and/or John Doe Police Officers (1-100) descended onto the beach, and without reasonable suspicion or probable cause, handcuffed, detained, arrested and criminally charged Plaintiff CHARLES PLACA.
9. As a result of the aforementioned actions, Plaintiff CHARLES PLACA has been damaged.
10. The aforementioned actions of Defendants CHIEF OF POLICE LEONARD GUIDA, SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and/or John Doe Police

Officers (1-100) violated Plaintiff CHARLES PLACA's rights under New Jersey's State Constitution including, but not limited to:

- a. His right to enjoy life and liberty under Article 1, Paragraph 1;
- b. His right to pursue and obtain safety and happiness under Article 1, Paragraph 1;
- c. His right to speak freely under Article 1, Paragraph 6;
- d. His right to be free from unreasonable searches and seizures without a warrant under Article 1, Paragraph 7; and
- e. His right not to be subjected to excessive force and/or cruel or unusual punishment under Article 1, Paragraph 12;

11. The actions of Defendants CHIEF OF POLICE LEONARD GUIDA, SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and/or John Doe Police Officers (1-100) toward Plaintiff CHARLES PLACA, were in violation of New Jersey's Civil Rights Act, N.J.S.A. 10:6-1, et seq.

WHEREFORE, Plaintiff CHARLES PLACA, demands judgment against Defendants CHIEF OF POLICE LEONARD GUIDA, SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and/or John Doe Police Officers (1-100) as follows:

- a. Compensatory damages;
- b. Punitive damages;
- c. Attorneys' fees and litigation costs;

d. Any other relief the Court deems equitable and just.

COUNT THREE

1. Plaintiff repeats and incorporates the allegations contained in Counts One through Two as if fully set forth herein at length.
2. At any and all times herein mentioned, Defendant BOROUGH OF BRADLEY BEACH and/or Defendant CHIEF OF POLICE LEONARD GUIDA was responsible for the supervision, control, instruction, training and/or hiring of its officers, employees, servants, agents, representatives and/or appointees, specifically Defendants SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and John Doe Police Officers (1-100).
3. Defendant BOROUGH OF BRADLEY BEACH and/or Defendant CHIEF OF POLICE LEONARD GUIDA was deliberately indifferent to the constitutional rights of Plaintiff CHARLES PLACA, by failing to adequately screen or train its municipal employees, specifically Defendants SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and John Doe Police Officers (1-100), by failing to equip them with specific tools necessary to handle recurring and predictable situations such as the one involving Plaintiff CHARLES PLACA,.
4. As a result this failure to adequately screen and/or train its employees, Plaintiff CHARLES PLACA, has been damaged.

5. The actions of Defendant BOROUGH OF BRADLEY BEACH and/or Defendant CHIEF OF POLICE LEONARD GUIDA toward Plaintiff CHARLES PLACA, were in violation of New Jersey's Civil Rights Act, N.J.S.A. 10:6-1, et seq.

WHEREFORE, Plaintiff CHARLES PLACA, demands judgment against Defendants BOROUGH OF BRADLEY BEACH and/or CHIEF OF POLICE LEONARD GUIDA as follows:

- a. Compensatory damages;
- b. Punitive damages;
- c. Attorneys' fees and litigation costs;
- d. Any and all other relief the Court may deem equitable and just.

COUNT FOUR

1. Plaintiff repeats and incorporates the allegations contained in Counts One through Three as it fully set forth herein at length.
2. Upon information and belief, at all relevant times herein, Defendant SERGEANT MICHAEL RICCIARDI, SERGEANT EDWARD SCOTT, CAPTAIN STEPHEN FAHNHOLZ and/or Defendants John Doe Police Officers (3-100) were executing the policy and/or custom of Defendant BOROUGH OF BRADLEY BEACH and/or Defendant CHIEF OF POLICE LEONARD GUIDA in his handling of Plaintiff CHARLES PLACA.

3. The aforementioned policy and/or custom were such that it was deliberately indifferent to the constitutional rights of citizens, including Plaintiff CHARLES PLACA,.
4. As a result of the aforementioned policy or custom, Plaintiff CHARLES PLACA, has been damaged.
5. The actions of Defendant BOROUGH OF BRADLEY BEACH and/or Defendant CHIEF OF POLICE LEONARD GUIDA toward Plaintiff CHARLES PLACA, were in violation of New Jersey's Civil Rights Act, N.J.S.A. 10:6-1, et seq.

WHEREFORE, Plaintiff CHARLES PLACA, demands judgment against Defendants BOROUGH OF BRADLEY BEACH and/or CHIEF OF POLICE LEONARD GUIDA as follows:

- a. Compensatory damages;
- b. Punitive damages;
- c. Attorneys' fees and litigation costs;
- d. Any and all other relief the Court may deem equitable and just.

COUNT FIVE

1. Plaintiff repeats and incorporates the allegations contained in Counts One through Four as it fully set forth herein at length.
2. At any and all times herein mentioned, Plaintiff LAUREN PLACA was legally disabled and legally handicapped and had privileges commensurate with those designations.

3. At any and all times herein mentioned, Defendant BOROUGH OF BRADLEY BEACH is the entity responsible for the operation of governmental services within its territorial jurisdiction, and Defendant BOROUGH OF BRADLEY BEACH is duly incorporated under the laws of the State of New Jersey.
4. Pursuant to N.J.S.A. 10:5-5, the beach of Defendant BOROUGH OF BRADLEY BEACH is a place of public accommodation.
5. By locking Handicapped Access to the aforementioned beach parking spaces, Defendant BOROUGH OF BRADLEY BEACH directly and/or indirectly denied to Plaintiff LAUREN PLACA access to the aforementioned beach in violation of N.J.S.A. 10:5-12(f)(1).
6. As a result of that aforementioned actions by Defendant BOROUGH OF BRADLEY BEACH, Plaintiff LAUREN PLACA was damaged.

WHEREFORE, Plaintiff LAUREN PLACA demands judgment against Defendant BOROUGH OF BRADLEY BEACH under New Jersey's Law Against Discrimination as follows:

- a. Compensatory damages;
- b. Punitive damages
- c. Attorneys' fees and litigation costs; and
- d. Any and all other relief the Court may deem equitable and just.

R. 4:5-1 CERTIFICATION

Pursuant to R. 4:5-1, I hereby certify that to the best of my knowledge, information and belief, the matter in controversy is not the subject of any other action pending in any Court or arbitration proceedings, and no other action is contemplated. I know of no other parties that should be joined herein.

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

I certify the 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 R. 1:38-7(b).

JURY DEMAND PURSUANT TO R. 4:35-1

Plaintiffs hereby demand Trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designate Arthur J. Murray, Esquire as trial counsel in this case.

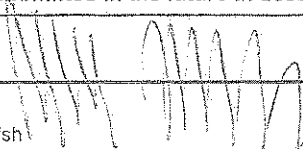
JACOBS & BARBONE, P.A.

BY: _____

Arthur J. Murray, Esquire

Dated: February 13, 2015

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
	Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		PAYMENT TYPE: ☐ CK ☐ CG ☐ CA	
			CHG/CK NO.	
			AMOUNT:	
			OVERPAYMENT:	
		BATCH NUMBER:		
ATTORNEY / PRO SE NAME Arthur J. Murray		TELEPHONE NUMBER (609) 348-1125		COUNTY OF VENUE Monmouth ☐
FIRM NAME (if applicable) Jacobs & Barbone, P.A.		DOCKET NUMBER (when available) L-507-15		
OFFICE ADDRESS 1125 Pacific Avenue Atlantic City, New Jersey 08401		DOCUMENT TYPE Complaint		
		JURY DEMAND ☒ Yes ☐ No		
NAME OF PARTY (e.g., John Doe, Plaintiff) Lauren Placa and Charles Placa		CAPTION Lauren Placa and Charles Placa v. Borough of Bradley Beach, Chief of Police Leonard Guida, Sergeant Michael Ricciardi, Sergeant Edward Scott, Captain Stephen Fahnholz and John Does (#1-#100)		
CASE TYPE NUMBER (See reverse side for listing) 005	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) ☐ 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 Wheelchair Access		
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 Rule 1:38-7(b).				
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) | 268 PRUDENTIAL TORT LITIGATION |
| 271 ACCUTANE/ISOTRETINOIN | 289 REGLAN |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 278 ZOMETA/ARELIA | 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

MONMOUTH COUNTY
SUPERIOR COURT
PO BOX 1269
FREEHOLD

NJ 07728

COURT TELEPHONE NO. (732) 677-4240
COURT HOURS 8:30 AM - 4:30 PM

TRACK ASSIGNMENT NOTICE

DATE: FEBRUARY 23, 2015
RE: PLACA ET AL VS BOROUGH OF BRADLEY BEACH ET AL
DOCKET: MON L - 000597 15

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 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 DENNIS R. O'BRIEN

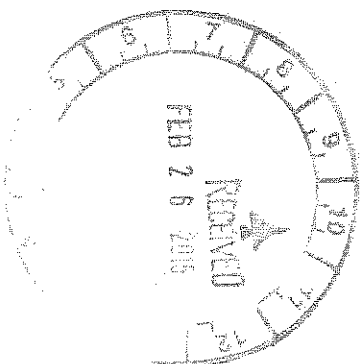
IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (732) 677-4249 EXT 4249.

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:

ATTY ARTHUR J. MURRAY
JACOBS E BARONE
1125 PACIFIC AVE
ATLANTIC CITY NJ 08401

JUNVALO



ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

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

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 South Broad Street, P.O. Box
8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

SALEM COUNTY:

Deputy Clerk of the Superior Court
92 Market Street, P.O. Box 18
Salem, NJ 08079
LAWYER REFERRAL
(856) 678-8363
LEGAL SERVICES
(856) 451-0003

BERGEN COUNTY:

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

ESSEX COUNTY:

Deputy Clerk of the Superior Court
50 West Market Street
Room 131
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6207
LEGAL SERVICES
(973) 624-4500

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

SOMERSET COUNTY:

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

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First F., Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(800) 496-4570

GLOUCESTER COUNTY:

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

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
71 Monument Park
P.O. Box 1262
Court House, East Wing
Freehold, NJ 07728-1262
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
1st Fl., Hall of Records
101 S. Fifth Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 964-4520
LEGAL SERVICES
(856) 964-2010

HUDSON COUNTY:

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

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

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

CAPE MAY COUNTY:

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

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08862
LAWYER REFERRAL
(908) 263-6109
LEGAL SERVICES
(908) 782-7979

OCEAN COUNTY:

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

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House, 413 Second Street
Belvidere, NJ 07823-1500
LAWYER SERVICE
(973) 267-5882
LEGAL SERVICES
(973) 475-2010

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900