

SUMMONS

Attorney(s) Damian Kazazian
Office Address 523 Summit Ave
Town, State, Zip Code Hackensack NJ 07601
Telephone Number 201 970-1300
Attorney(s) for Plaintiff pro se

Superior Court of
New Jersey

Bergen COUNTY
LAW DIVISION

Docket No: _____

Damian Kazazian
Plaintiff(s)

CIVIL ACTION SUMMONS

vs. Hackensack Police Department
Defendant(s)

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 _____.)

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 _____.

M. Kelly M. Smith
Clerk of the Superior Court

DATED: 7/24/10

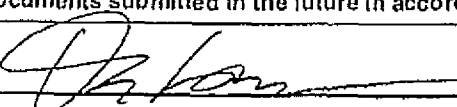
Name of Defendant to Be Served:

Hackensack Police Department

Address of Defendant to Be Served:

225 State Street Hackensack, NJ 07601

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), 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 Damian Kazazian pro se		TELEPHONE NUMBER (201) 970-1300	
	COUNTY OF VENUE Bergen		DOCKET NUMBER (when available) BER-L-	
	FIRM NAME (if applicable)		DOCUMENT TYPE Complaint	
OFFICE ADDRESS 523 Summit Ave Hackensack, NJ 07601		JURY DEMAND ☒ Yes ☐ No		
NAME OF PARTY (e.g., John Doe, Plaintiff) Damian Kazazian, Plaintiff pro se		CAPTION Damian Kazazian v. Bergen Cty Pros Office, John Molinelli, Demetria Maurice, Catherine Fantuzi, Hackensack Police Dept., State of NJ, DCP&P, Victoria Kryzsiak, John/Jane Doe, Shirley Goncalves, etc.		
CASE TYPE NUMBER (See reverse side for listing) 699	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				
RECEIVED MAY 31 2017 SUPERIOR COURT OF NEW JERSEY COUNTY OF BERGEN FINANCE DIVISION				
☒ 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</i> 1:38-7(b).				
ATTORNEY SIGNATURE:  5/31/17				



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)
- 508 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

- 158 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)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | |

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

Damian Kazazian, Pro Se
523 Summit Avenue
Hackensack, New Jersey 07601
201-970-1300
cardservicedk@aol.com
Attorney pro se for plaintiff Damian Kazazian

RECEIVED
MAY 31 2017
SUPERIOR COURT OF NEW JERSEY
COUNTY OF BERGEN
FINANCE DIVISION

DAMIAN KAZAZIAN

Plaintiff,

vs.

BERGEN COUNTY PROSECUTORS OFFICE,
JOHN MOLINELLI, DEMETRIA MAURICE,
CATHERINE FANTUZI, DETECTIVE LOVE,
DETECTIVE SANTIAGO, DETECTIVE
ROSE, SHIRLEY GONCALVES,
HACKENSACK POLICE DEPARTMENT, DET.
MARBLE, DIR. MICHAEL MORDAGA,
CAPT. THOMAS SALCEDO, THE STATE OF
NEW JERSEY, NEW JERSEY DIVISION OF
CHILD PROTECTION AND
PERMANENCY ("DCP&P") (Formerly
Division of Youth and Family
Services), VICTORIA KRYZSIK, DAG,
including all of the above
agencies agents, representatives
and employees that may have in any
way been involved in the matters
complained of, JOHN and JANE
DOES, same being a plural
factitious name for all
individuals unknown at this time;
and XYZ CORPORATIONS, same being a
plural factitious name for all
business entity parties unknown at
this time.

Defendant(s).

SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY - LAW DIVISION

Docket No.: BER-L-_____

Civil Action

COMPLAINT

NOW COMES Plaintiff DAMIAN KAZAZIAN, in the above captioned
matter for his cause of action against Defendants, state as

follows:

PARTIES

1. Plaintiff, Damian Kazazian. (referred to at times as "Kazazian") resided at 523 Summit Avenue, Hackensack, Bergen County, New Jersey at times relevant to this Complaint, and is the father of GK.
2. GK is a minor. GK is the female child of Plaintiff Kazazian. Her date of birth is January 8, 2009.
3. Defendants BERGEN COUNTY PROSECUTORS OFFICE, JOHN MOLINELLI, DEMETRIA MAURICE, CATHERINE FANTUZI, DETECTIVE LOVE, DETECTIVE SANTIAGO, DETECTIVE ROSE, is an organization and the individuals, with their primary place of business located at 10 Main Street, Bergen County, Hackensack, New Jersey 07601.
4. Defendant SHIRLEY GONCALVES is the mother of GK and upon information and belief, resides at 308 West Main Street, Bergen County, Bergenfield, New Jersey 07631
5. Defendants HACKENSACK POLICE DEPARTMENT, DET. MARBLE, DIR. MICHAEL MORDAGA, CAPT. THOMAS SALCEDO, is an organization and the individuals, with their primary place of business located at 225 State Street, Bergen County, Hackensack, New Jersey 07601
6. Defendants THE STATE OF NEW JERSEY is an organization, with its primary place of business located at Hughes Justice Complex, 25 Market Street, Trenton, NJ 08625.
7. NEW JERSEY DIVISION OF CHILD PROTECTION AND

PERMANENCY("DCP&P") (Formerly Division of Youth and Family Services), VICTORIA KRYZSIK, DAG is an organization and the individual, with their primary place of business located at the Bergen South Local Office at 125 State Street, Bergen County, 1st & 2nd Floors, Hackensack, New Jersey 07601.

8. All of the above defendants including all of the above agencies agents, representatives and employees that may have in any way been involved in the matters complained of, JOHN and JANE DOES, same being a plural fictitious name for all individuals unknown at this time; and XYZ CORPORATIONS, same being a plural fictitious name for all business entity parties unknown at this time, all taken together in this complaint are at all times referred to as defendants, jointly and severally.

FACTS

9. Plaintiff Kazazian is the father of GK who is now 8 years old.
10. Plaintiff Kazazian has and has always had joint legal custody of GK and enjoys parenting time with GK under a liberal schedule.
11. Plaintiff Kazazian has exercised his Fundamental Constitutional Right as parent to make decisions concerning the care, custody, and control of his child, KG.
12. Plaintiff Kazazian has exercised his Fundamental Constitutional Right to be free from unlawful investigations performed under color of state law that threaten removal of children from parents by state agencies, where there is no

reasonable and articulable evidence giving rise to a reasonable suspicion that a child has been abused or is in imminent danger of abuse.

13. Damian Kazazian has exercised his Fundamental Constitutional Right to be free from unlawful investigations performed under color of state law whose purpose is to fabricate evidence for the purpose of depriving persons of Constitutional Rights.
14. On April 16, 2014, Damian Kazazian was peacefully at his home and enjoying parenting time with his child GK.
15. On April 17, 2014, upon a fabricated and false allegation made up by GK's mother, defendant Goncalves, and with no reasonable and articulable evidence giving rise to a reasonable suspicion that GK had been sexually abused or was in imminent danger of abuse by the Plaintiff or anyone else, plaintiff Kazazian was arrested for criminal conduct.
16. Without evidence of any kind, defendant Goncalves alleged that Kazazian had sexually assaulted their daughter GK for the purpose of criminally coercing money from him and taking GK away from him.
17. On April 17, 2014, defendant Goncalves presented her false story to the Defendants above, whom, without investigation of any material kind, immediately charged plaintiff Kazazian with a violation of criminal law and took away GK from him, barring him from seeing her at all.
18. Without conducting any further investigation, limited to what

they call a "forensic interview" the defendants had law enforcement personnel arrested plaintiff Kazazian and destroyed his life.

19. Plaintiff Kazazian was wrongfully arrested, wrongfully charged, wrongfully prosecuted, defamed, slandered, libeled and had countless intentional and negligent torts committed against him, including slander per se which destroyed his business reputation and called him a child molester, child predator and the like, having allegedly committed those acts against his own child, GK.
20. The defendants above chose to do no investigation for a period of nine (9) months even despite plaintiff Kazazian and his representatives constantly demanding that such investigation take place and that any delay will cause him greater and greater harm.
21. If the defendants above had done even one scintilla of investigation they would have seen that a long history existed between Damian Kazazian and Shirley Goncalves arguing over their child GK and custody and travel issues.
22. If defendants conducted a further investigation they would have seen that Shirley Goncalves had tried unsuccessfully to make these same and other false claims against Damian Kazazian in other forums and to medical professionals, in secret, all who did their own investigation and did not believe her.
23. These records were at all times in the possession of one state

agency or another and accessible by other means, but certainly leave of the Court, if they made such an effort in their investigation. They would have seen that Shirley Goncalves had motive, stated intent (heard by several witnesses) and opportunity to make up these false charges against Damian Kazazian in order to harass him, extort money from him, and seek to criminally coerce him, all of which Shirley Goncalves criminally charged for.

24. If the defendants had done investigation they would have seen that the medical records that were always available to the defendants in this matter do not in any capacity support any of the claims Shirley Goncalves was making or stating that GK was making or the claims that the defendants were obligated to investigate.
25. In 2015, after plaintiff repeatedly demanding same, defendants first dismissed the criminal charges has having absolutely no evidence to support same and then dismissed the divisions case which kept plaintiff's child away from him in any part, legally. The matters were finally resolved in June of 2015.

FIRST COUNT
(Defamation)

26. Plaintiff re-alleges and incorporates the allegations set forth above in as if fully set forth herein.
27. Plaintiff is an individual who, prior to April 17, 2014 enjoyed a well known and relied upon good reputation in both his personal and professional life, free from negative remarks

or criticism, which is something he worked all of his life to attain.

28. Prior to the Defendants publically making false and slanderous statements against the plaintiff, under color of law, to advance their position or for their own self interest, the plaintiff maintained his excellent business and personal reputation by keeping to those high levels of excellence in all walks of life.
29. On April 17, 2014, when the defendants began the course of conduct that they did, without proper investigation, which wrongfully and maliciously alleges that the plaintiff was a child molester and other claims, that defamed him in both written and spoken form and ruined his life.
30. The defendants, knowing or should have known that the allegations against plaintiff were false, proceeded, over repeated objection by the plaintiff and his representative, to publically and aloud and in the hearing and presence of, certain persons, maliciously and defamatorily speak and published of and concerning this plaintiff, certain slanderous, false, malicious, scandalous, injurious and defamatory words and make a mockery of plaintiff, labeling him as having committed horrific perverted sexual acts against his own child, all without having procured any real evidence of same.
31. The conduct of the defendants were done intentionally and

heard by witnesses and intentionally meant to blacken and injure the honesty, integrity, morality and reputation of the plaintiff individually and his business, and to thereby expose him to public contempt and ridicule, and to injure and damage his personal and business reputation, now and for the future.

32. The plaintiff further states that said defamatory conduct of the defendants in all of its forms, were and are utterly false, malicious and slanderous and have severely damaged the plaintiff's business and professional reputation in the community.

33. As a direct and proximate result of the defendants' conduct, Plaintiff has been impaired in his capacity to earn a living, and has sustained and will sustain loss of income in amounts that will be established at trial.

34. As a direct and proximate result of defendants' conduct, including the publication of false, misleading, and defamatory statements, both in writing and verbally, before and after the filing any matter against the plaintiff, far beyond any immunity that the filing of a complaint or charge may provide, when none of this conduct is allowed under the law, plaintiff has suffered and will continue to suffer extreme mental anguish and distress and sever pecuniary loss.

WHEREFORE, plaintiff demands judgment against defendants, jointly and severally, for compensatory damages in the amount of \$10,500,000.00 as well as punitive damages in such amounts as

justice may require, together with costs of suit and counsel fees, and such other relief as the court may deem proper.

SECOND COUNT

(Intentional and Negligent interference with Economic Relations)

35. Plaintiff re-alleges and incorporates the allegations set forth above in as if fully set forth herein.
36. By the defendants committing the conduct complained of above, jointly and severally, by defaming and slandering the plaintiff, the defendants have individually and collectively set out on a course to intentionally destroy the personal reputation, livelihood, business, and income earning capacity of plaintiff, as was their intention to do or that they were so negligent in their duties to do, with the purposeful intent or extreme negligence to interfere with his income.
37. In addition to said injury above, plaintiff has been caused to spend \$165,000.00 in order to defend himself in this wrongful actions of the defendants, all due to the defendants' intentional and/or negligent wrongful conduct.
38. That this conduct was designed by defendants to and in fact has pecuniarily injured the income earning potential of the plaintiff and the advancement of his personal life and his business profession.
39. That as a result of said act or actions and interference with plaintiff's economic relations, defendants have both taken intentional and affirmative actions as well as committed negligent acts, to deprive plaintiff of monies that are due

him, prospectively and retrospectively, directly and indirectly, in violation of law contract, covenants and agreements, all in order to deprive plaintiff of same and injure him pecuniarily.

40. That by reason of the foregoing, the plaintiff has been damaged in the sum of \$10,500,000.00 for the injury to his personal reputation and business, which is his sole source of income, plus costs of this suit, legal fees, interest and other damages that the court may deem appropriate.

WHEREFORE, plaintiff demands judgment against defendants, jointly and severally, for compensatory damages in the amount of \$10,500,000.00 as well as punitive damages in such amounts as justice may require, together with costs of suit and counsel fees, and such other relief as the court may deem proper.

THIRD COUNT
(Malicious Prosecution)

41. Plaintiff re-alleges and incorporates the allegations set forth above in as if fully set forth herein.
42. Defendants knowingly and intentionally brought complaints and charges against the plaintiff for malicious claims in which the defendants knew or should have known, and were being told and presented evidence that shows they were all not true.
43. The defendants have maliciously filed criminal charges and civil complaint by the DCPD against the plaintiff, based on no factual basis, and that fact that they had done so specifically for that reason and to harass, pressure, annoy

and injure the plaintiff, publically, even against the great weight of evidence presented to them by plaintiff's representative and the non existence of any inculpatory facts.

44. Defendants, knowing these facts of court and judicial record contained in the underlying matter were without merit, had the duty to exercise the care and caution in filing false pleadings, charges and statements against any party, in order that their pleading and/or charges not be deemed solely to harass or maliciously prosecute said parties for other reasons other than the facts and law dictate same as right and proper.
45. As a direct and proximate result of the intentional act of the defendants to bring these wrongful charges and complaints, when they knew or should have known that all the facts they allege are negated by matters of record, by those witnesses who plaintiff brought forth to substantiate the factual basis against the veracity of the false charges and the false complaint, the plaintiff has been caused to spend hundreds of thousands of dollars in order to defend himself and his business in this wrongful action, all due to the defendants' intentional and wrongful conduct and this has caused plaintiff injury.

WHEREFORE, plaintiff demands judgment against defendants, jointly and severally, for compensatory damages in the amount of \$10,500,000.00 as well as punitive damages in such amounts as justice may require, together with costs of suit and counsel fees, and such other relief as the court may deem proper.

FOURTH COUNT
(Refusal to Mitigate Damages)

46. Plaintiff re-alleges and incorporates the allegations set forth above in as if fully set forth herein.
47. At some point in time where defendants realized that their conduct, did, was and would continue to cause plaintiff damages and continued damages, and well after the great amount of possible loss and pecuniary injury was already suffered by plaintiff, plaintiff demanded of that the Defendants cease there bad faith acts and drop all charges against him. This was done by way of letters and phone calls by plaintiff's representative, in court arguments and other means.
48. This offer was an opportunity to address these issues properly and see them for the malicious and vengeful conduct of defendant Goncalves that they really were, supported by no facts of any kind, and present repeated opportunities to cure this bad faith malicious conduct of defendants, including but not limited to filing false criminal charges and DCPD complaints, all in an effort to mitigate any damages plaintiff might already have incurred or may incur in the future.
49. Despite all these attempts by the Plaintiff to force the defendants to mitigate all damages in general and cause the defendant to assist them in mitigating damages, Defendants stalwartly and repeatedly refused to entertain said discussion or do the proper requested conduct in order to resolve these issues.

50. As a result of Defendants refusal to mitigate their damages, said damages were not lowered or avoided and only increased and are now incurred by plaintiff, through no fault of its own.

WHEREFORE, plaintiff demands judgment against defendants, jointly and severally, for compensatory damages in the amount of \$10,500,000.00 as well as punitive damages in such amounts as justice may require, together with costs of suit and counsel fees, and such other relief as the court may deem proper.

DEMAND FOR TRIAL BY JURY

Plaintiffs hereby demand a trial by jury on all issues.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:5-1(c), Damian Kazazian, is hereby designated a trial counsel for this cause.

GENERAL DISCOVERY REQUEST TO PRODUCE

Demand is hereby made now and should be considered ongoing to provide this office within thirty (30) days with every item, document, statement, tangible item, digital data, or anything else you intend to use and/or rely on at the time of trial in your case in chief, cross examination, rebuttal, for impeachment or for any other possible use.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to New Jersey Court Rule 4:10-2(b), demand is made that each defendant disclose to plaintiff whether or not 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 indemnify or reimburse for payments made to satisfy the judgment and provide plaintiffs with true copies of those insurance agreements and policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary coverage, but also any and all excess, catastrophe and umbrella policies.

CERTIFICATION PURSUANT TO COURT RULE 4:5-1

I hereby certify that the matter in controversy is not the subject matter of another action. I further certify that no other action is pending in any other court or is a pending arbitration proceeding and that no other action or arbitration proceeding is contemplated concerning this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'D. Kazazian', written over a horizontal line.

Damian Kazazian, Plaintiff Pro Se

DATED: May 31, 2017