

Arthur J. Murray, Esquire
N.J. Attorney ID No. 013901995
Alterman & Associates, LLC
8 South Maple Avenue
Marlton, NJ 08052
Phone: (856) 334-5737
Fax: (856) 334-5731
ArthurJMurrayEsq@aol.com
amurray@alterman-law.com
Attorneys for Plaintiff

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CLERK OF SUPERIOR COURT OF NJ
MERCER COUNTY
TRENTON, NJ

JANINE KRUPA, Plaintiff, v. BOROUGH OF HIGHTSTOWN, Defendant.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – CIVIL PART MERCER COUNTY Docket No. MER-L-543 -17 Civil Action COMPLAINT, JURY DEMAND AND DESIGNATION OF TRIAL COUNSEL
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Plaintiff JANINE KRUPA, a resident of Mercer County, New Jersey, complaining
against Defendant BOROUGH OF HIGHTSTOWN, says:

FIRST COUNT

1. Plaintiff JANINE KRUPA, was at all times relevant hereto employed as a full-time Police Officer by Defendant BOROUGH OF HIGHTSTOWN and doing her job with an industrious and conscientious fervor from December 18, 2006 through the present.
2. In or about August of 2015, pursuant to required Standard Operating Procedures of the Police Department for Defendant BOROUGH OF HIGHTSTOWN, Plaintiff JANINE KRUPA advised her superior officers that she was pregnant with her third child.

3. Shortly thereafter, on October 6, 2015, Plaintiff JANINE KRUPA had her scheduled hours reduced from 40 hours per week to 16 hours per week by Defendant BOROUGH OF HIGHTSTOWN.
4. Said reduction in hours continued through March 24, 2016 when Plaintiff JANINE KRUPA took formal leave due to her pregnancy.
5. Plaintiff JANINE KRUPA was on leave due to her pregnancy from March 24, 2016 through July 20, 2016.
6. Upon her return to work following said leave, Plaintiff JANINE KRUPA was returned to her normal 40 hour work week.
7. At no time relevant hereto did Plaintiff JANINE KRUPA or any authorized agent on behalf of Plaintiff JANINE KRUPA request a reduction in her hours from 40 hours per week to 16 hours per week.
8. At no time relevant hereto was Plaintiff JANINE KRUPA served with discipline by Defendant BOROUGH OF HIGHTSTOWN, where the proposed penalty of said discipline was a reduction in her work week from 40 hours per week to 16 hours per week.
9. Defendant BOROUGH OF HIGHSTOWN had no legitimate business reason for reducing the work week of Plaintiff JANINE KRUPA from 40 hours per week to 16 hours per week from October 6, 2015 through March 24, 2016.
10. But for Plaintiff JANINE KRUPA announcing her pregnancy, her work week would not have been reduced from 40 hours per week to 16 hours per week from October 6, 2015 through March 24, 2016.

11. Defendant BOROUGH OF HIGHSTOWN did not reduce the work week of Plaintiff JANINE KRUPA during either of her first two pregnancies, which occurred while she was employed with Defendant and had similar, if not, identical medical issues.
12. Defendant BOROUGH OF HIGHSTOWN did not reduce the work week of other employees who had medical issues requiring light duty or other accommodations.
13. At the time she took pregnancy leave, Plaintiff JANINE KRUPA was the Officer in Charge ("OIC") of her shift, which said designation comes with certain financial remuneration.
14. Upon return from pregnancy leave on July 20, 2016, Plaintiff JANINE KRUPA was no longer designated OIC and the corresponding financial remuneration was taken away.
15. The reduction in the work week of Plaintiff JANINE KRUPA from 40 hours per week to 16 hours per week from October 6, 2015 through March 24, 2016 due to her pregnancy represents a violation of New Jersey's Law Against Discrimination.
16. The removal of the OIC designation from Plaintiff JANINE KRUPA due to her pregnancy represents a violation of New Jersey's Law Against Discrimination.
17. As a result of the actions of Defendant BOROUGH OF HIGHTSTOWN, Plaintiff JANINE KRUPA has been damaged.

WHEREFORE, Plaintiff JANINE KRUPA demands judgment against Defendant BOROUGH OF HIGHTSTOWN as follows:

- A. An injunction to restrain continued violation of the New Jersey Law Against Discrimination;
- B. Immediate reinstatement and restoration to office, namely the same position held by Plaintiff prior to the retaliatory action of Defendant or an equivalent position;
- C. Full reinstatement of fringe benefits, including appropriate pension contributions, and seniority rights;
- D. Full reinstatement and back pay constituting compensation for lost wages, benefits and other remuneration;
- E. Payment by defendants of the reasonable costs of this action and for attorneys' fees;
- F. Compensatory damages;
- G. Punitive damages;
- H. The assessment of a Civil Penalty as allowed by law;
- I. Any other relief allowed under the New Jersey Law Against Discrimination;
and
- J. Any other relief that the Court deems 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(c)

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

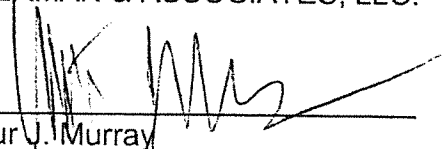
Plaintiff hereby demands Trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Arthur J. Murray, Esquire as trial counsel in this case.

ALTERMAN & ASSOCIATES, LLC.

BY:


Arthur J. Murray
amurray@alterman-law.com
ArthurJMurrayEsq@aol.com

Dated: March 10, 2017