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Attorneys for Plaintiff, HEATHER WILLIAMSON-HUGHES

HEATHER WILLIAMSON-HUGHES,

Plaintiff,

vs.

LAMBERTVILLE CITY POLICE
DEPARTMENT, THE CITY OF
LAMBERTVILLE, THE COUNTY OF
HUNTERDON, HUNTERDON COUNTY
PROSECUTOR'S OFFICE -NARCOTICS
TASK FORCE UNIT, SERGEANT
GRAMLICH, OFFICER V. ALBANI,
JOHN DOES POLICE OFFICERS and/or
OFFICIALS 1-10, THE STATE OF NEW
JERSEY,

Defendant.

SUPERIOR COURT OF NEW JERSEY
MERCER COUNTY/LAW DIVISION
DOCKET NO. MER-L-2378-18

CIVIL ACTION

SUMMONS

FROM THE STATE OF NEW JERSEY, TO THE DEFENDANT(S) NAMED ABOVE:

The City of Lambertville

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 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, CN 971, Trenton, NJ 08625. A \$135.00 filing fee payable to the Clerk of the Superior Court 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 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. 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.

Michelle M. Smith
MICHELLE M. SMITH
Clerk of the Superior Court

Dated: May 22, 2019

Name of defendant to be served: **The City of Lambertville**
Address for service: **18 York Street,**
 Lambertville, NJ 08530

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Attorneys for Plaintiff, HEATHER WILLIAMSON-HUGHES

**HEATHER
WILLIAMSON-HUGHES,**

Plaintiff(s),

vs.

**LAMBERTVILLE CITY POLICE
DEPARTMENT, TRENTON
POLICE DEPARTMENT, THE
CITY OF LAMBERTVILLE, THE
COUNTY OF HUNTERDON,
HUNTERDON COUNTY
PROSECUTOR'S OFFICE
-NARCOTICS TASK FORCE UNIT,
SERGEANT GRAMLICH,
OFFICER V. ALBANI, JOHN
DOES POLICE OFFICERS and/or
OFFICIALS 1-10, THE STATE OF
NEW JERSEY,**

Defendant(s).

**SUPERIOR COURT OF NEW JERSEY
MERCER COUNTY/LAW DIVISION
DOCKET NO.**

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, HEATHER WILLIAMSON-HUGHES residing at 57 Willis Drive, in the City of Ewing, in the County of Mercer and in the State of NJ 08628, by way of complaint against defendant says:

STATEMENT OF FACTS

1. On November 14, 2016, plaintiff, HEATHER WILLIAMSON-HUGHES, was a business invite in the parking lot of Lambertville Fine Foods and Flowers, 76 Bridge Street, in the City of Lambertville, County of Hunterdon and State of New Jersey.

2. At the same time and place, Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI, HUNTERDON COUNTY PROSECUTOR'S OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF LAMBERTVILLE, THE COUNTY OF HUNTERDON, JOHN DOES POLICE OFFICERS and/or OFFICIALS 1-10, THE STATE OF NEW JERSEY, were conducting a "Buy and Bust" operation.

3. Plaintiff, HEATHER WILLIAMSON-HUGHES had been at a wellness check for her recent c-section incision with her four (4) day old infant son at Phillips Barber Family Health and stopped at the Lambertville Fine Food and Flowers to purchase some food, parking her vehicle in the store's parking lot.

4. Plaintiff, HEATHER WILLIAMSON-HUGHES opened her purse and to look for money to make a purchase.

5. When plaintiff, HEATHER WILLIAMSON-HUGHES, looked up from her purse, she observed a man in plain clothing approach her vehicle from behind with a gun drawn and pointed at her. Plaintiff then looked to her right and saw three (3) more men approaching her vehicle, with guns drawn. Two (2) of these individuals were dressed in police uniforms including bullet proof vests.

6. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS, maliciously and baselessly yelled to plaintiff, HEATHER WILLIAMSON-HUGHES, to “put your hands up, Get your hands up, Don’t move, Let me see your hands.”

7. Plaintiff, HEATHER WILLIAMSON-HUGHES slowly stepped toward the officers with her hands deferentially raised in the air, showing that she was not a threat

8. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS, continued to verbally and mentally terrorize and confuse plaintiff by reaching in her vehicle, take her phone, hang up on the conversation plaintiff was having, and yelling different commands and questions at plaintiff.

9. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS, next requested plaintiff to produce and hand her identification to them and step out of her vehicle. Plaintiff also reminded defendants that her infant son was in the vehicle.

10. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS continued to interrogate plaintiff about her actions that day, where she had been and why, questioning why she choose a physician in Lambertville and why not a doctor in Trenton, New Jersey.

11. After a period of time Plaintiff, HEATHER WILLIAMSON-HUGHES’ phone rang and defendants again became belligerent, verbally and mentally assaulting plaintiff.

12. As a direct and proximate cause of the negligence, the plaintiff, HEATHER WILLIAMSON-HUGHES, suffered severe mental anguish, capacity for the loss of enjoyment of life, injury to reputation, incurred medical costs and expenses, and household and maintenance expenses. These injuries are permanent in nature and plaintiff will continue to suffer such losses for the remainder of her life.

WHEREFORE, Plaintiff, HEATHER WILLIAMSON-HUGHES demands judgment against defendants for compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial;

- a) economic losses on all claims allowed by law;
- b) special damages in an amount to be determined at trial;
- c) punitive damages on all claims allowed by law against individual Defendants and in an amount to be determined at trial;
- d) attorneys' fees and the costs associated with this action; and
- e) any further relief that this court deems just and proper

NOTICE OF CLAIMS

Plaintiff, HEATHER WILLIAMSON-HUGHES, in furtherance of her stated cause of action, filed timely a Notice of Claim against the Hunterdon County Prosecutor, State of New Jersey, City of Lambertville, Lambertville City Police Department, Hunterdon County Sheriff Trenton Police Department, and the New Jersey State Police in compliance with N.J.S.A. 59:8-4.

COUNT I
NEGLIGENCE AGAINST DEFENDANTS, HUNTERDON COUNTY PROSECUTOR'S
OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE
DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF LAMBERTVILLE,
THE COUNTY OF HUNTERDON, JOHN DOES POLICE OFFICERS and/or OFFICIALS
1-10, THE STATE OF NEW JERSEY

13. Plaintiff, HEATHER WILLIAMSON-HUGHES, adopts and realleges the allegations contained in paragraphs 1 through 12 inclusive as if set forth fully herein.

14. At all times material hereto, the defendants, HUNTERDON COUNTY PROSECUTOR'S OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF THE LAMBERTVILLE, THE COUNTY OF HUNTERDON AND JOHN DOES POLICE OFFICERS and/or OFFICIALS -10, AND THE STATE OF NEW JERSEY, carelessly:

- a) failed to conduct sufficient training or supervision with respect to the limitations on the use of excessive force;
- b) tolerating the use of excessive force;
- c) failed to uphold their duty due and owing to the public to protect and serve the public by carelessly and recklessly endangering the safety and well being of plaintiff.

15. As a direct and proximate cause of the negligence, the plaintiff, HEATHER WILLIAMSON-HUGHES, suffered severe mental anguish, capacity for the loss of enjoyment of life, injury to reputation, incurred medical costs and expenses, and household and maintenance expenses. These injuries are permanent in nature and plaintiff will continue to suffer such losses for the remainder of her life.

WHEREFORE, Plaintiff, HEATHER WILLIAMSON-HUGHES demand judgment against HUNTERDON COUNTY PROSECUTOR'S OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF THE LAMBERTVILLE, THE COUNTY OF HUNTERDON AND JOHN DOES POLICE OFFICERS and/or OFFICIALS -10, AND THE STATE OF NEW JERSEY for compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial;

- a) economic losses on all claims allowed by law;
- b) special damages in an amount to be determined at trial;
- c) punitive damages on all claims allowed by law against individual Defendants and in an amount to be determined at trial;
- d) attorneys' fees and the costs associated with this action; and
- e) any further relief that this court deems just and proper.

COUNT II
EXCESSIVE FORCE AGAINST DEFENDANTS, SERGEANT GRAMLICH, OFFICER V. ALBANI, JOHN DOES POLICE OFFICERS and/or OFFICIALS 1-10

16. Plaintiff, HEATHER WILLIAMSON-HUGHES, adopts and realleges the allegations contained in paragraphs 1 through 15 inclusive as if set forth fully herein.

17. Defendants, Sergeant Gramlich, Officer V. Albani and John Does Police Officers and/or Officials 1-10, caused severe psychological and emotional injuries when they maliciously and baselessly detained and attempted a false arrest of Plaintiff, HEATHER WILLIAMSON-HUGHES, utilizing excessive force resulting in severe emotional injuries to Plaintiff.

18. As a direct and proximate result of the defendants' willful use of excessive force, plaintiff suffered severe psychological and emotional injuries resulting in severe mental anguish, capacity for the loss of enjoyment of life, injury to reputation, and incurred medical costs and expenses. These injuries are permanent in nature and plaintiff will continue to suffer such physical and emotional losses from the remainder of her life.

WHEREFORE, Plaintiff, HEATHER WILLIAMSON-HUGHES demand judgment against defendants, Sergeant Gramlich, Officer V. Albani and John Does Police Officers and/or Officials 1-10, for compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial;

- a) economic losses on all claims allowed by law;
- b) special damages in an amount to be determined at trial;
- c) punitive damages on all claims allowed by law against individual Defendants and in an amount to be determined at trial;
- d) attorneys' fees and the costs associated with this action; and
- e) any further relief that this court deems just and proper

JURY DEMAND

Plaintiff hereby demands a trial by jury as to all issues as triable as a matter of right.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to Rule 4:25-4, Lawrence E. Popp, Esquire, is hereby designated as Trial Counsel in the within matter.

CERTIFICATION

It is hereby certified that the foregoing matter in controversy is not the subject of any other pending action in any Court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I further certify that there are no other parties of whom I am aware who should be joined in this action.

GAYLORD POPP, L.L.C.
Attorneys for Plaintiff

By: 

LAWRENCE E. POPP

Dated: November 13, 2018

Civil Case Information Statement

Case Details: MERCER | Civil Part Docket# L-002378-18

Case Caption: WILLIAMSON-HUGHES HEATHER VS
LAMBERTVILLE CITY P

Case Initiation Date: 11/13/2018

Attorney Name: LAWRENCE E POPP

Firm Name: GAYLORD POPP LLC

Address: 850 BEAR TAVERN ROAD SUITE 308

WEST TRENTON NJ 08628

Phone:

Name of Party: PLAINTIFF : Williamson-Hughes, Heather

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: TORT-OTHER

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

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? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? 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? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? 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)*

11/13/2018

Dated

/s/ LAWRENCE E POPP

Signed

MERCER COUNTY COURTHOUSE
CIVIL CASE MANAGEMENT OFFICE
175 SOUTH BROAD ST P O BOX 8068
TRENTON NJ 08650-0068

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 571-4200
COURT HOURS 8:30 AM - 4:30 PM

DATE: NOVEMBER 13, 2018
RE: WILLIAMSON-HUGHES HEATHER VS LAMBERTVILLE CITY P
DOCKET: MER L -002378 18

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 JANETTA D. MARBREY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 008
AT: (609) 571-4200.

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:

ATT: LAWRENCE E. POPP
GAYLORD POPP LLC
850 BEAR TAVERN ROAD
SUITE 308
WEST TRENTON NJ 08628

ECOURTS