

ZUCKER STEINBERG & WIXTED

By: Saul J. Steinberg

Attorney Id: 009271973

415 Federal Street

Camden, New Jersey 08103

(856) 365-0080

Attorneys for Plaintiff

RECEIVED AUG 04 2016

JOSEPH JACOB

Plaintiff,

v.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – CAMDEN COUNTY
DOCKET NO.: CAM-L- *2631-16*

Civil Action

BOROUGH OF LINDENWOLD;
LINDENWOLD POLICE DEPARTMENT;
DETECTIVE RONALD D. BURROWS JR.;
DETECTIVE CORTES; PATROLMAN
GALLEGOS; DETECTIVE ROMEO;
WINSLOW TOWNSHIP POLICE
DEPARTMENT; DETECTIVE MORGAN;
CAMDEN COUNTY SHERIFF'S DEPARTMENT;
JOHN/JANE DOES 1-100, fictitious persons;
ABC CORP. 1-100, fictitious entities

SUMMONS

Defendants.

FROM THE STATE OF NEW JERSEY TO THE ABOVE NAMED DEFENDANT:

BOROUGH OF LINDENWOLD

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, CN-971, Trenton, NJ 08625. A \$175.00 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 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 the Lawyer Referral Services. A list of these numbers is also provided. If you are not resident of the State of New Jersey, you may call the appropriate agency in the county in which this action is pending: Camden County, New Jersey.

DATED: 08/03/2016

/s/ Michelle E. Smith

MICHELLE E. SMITH

Name and Address of Defendant to be served:

**Borough of Lindenwold
15 N. WHITE HORSE PIKE
LINDENWOLD, NJ 08021**

LAWYER REFERRAL SERVICES

Atlantic County Bar Association
Lawyer Referral Service
Atlantic County Court House, 1201 Bacharach Blvd.,
Atlantic City 08401
(609) 345-3444; Fax: (609) 345-6279
E-mail: atcobar@ncl.com
Internet: www.atcobar.org
Exec. Dir.: Mary Williams Berard

Bergen County Bar Association
Lawyer Referral Service
15 Bergen St., Hackensack 07601
(201) 488-0044

Administrator: Lucy Vargues

Burlington County Bar Association
Lawyer Referral Service
45 Grant St., Mount Holly 08060
(609) 261-4862; Fax: (609) 261-5423
Internet: www.burlobar.net

Director: Kara E. Edens (609) 261-4542

Camden County Bar Association
Lawyer Referral Service
1040 Kings Hwy. N., Suite 201, Cherry Hill 08034
(856) 482-0618; Fax: (856) 482-0637
Internet: www.camdencountybar.org

Manager: Denise K. Whybark

Cape May County Bar Association
Lawyer Referral Service
Rt. 9, Main St., P.O. Box 425,
Cape May Court House 08210
(609) 463-0313; Fax: (609) 463-1666
E-mail: cmcbarasn@aol.com

Director: Susan Fuller

Cumberland County
Lawyer Referral Service
P.O. Box 2374, Vineland 08362
(856) 453-7000; Fax: (856) 453-7008

Exec. Dir.: Eleanor Mesiano

Essex County Bar Association
Lawyer Referral Service
354 Eisenhower Pkwy. Plaza II, Livingston 07039
(973) 533-6775; Fax: (973) 533-6720
Internet: www.essexbar.com

Administrator: Iraida Mendez (973) 533-6711

Gloucester County Bar Association
Lawyer Referral Service
Justice Complex, P.O. Box 338, Woodbury 08096
(856) 848-4589; Fax: (856) 848-9580

Administrator: Linda L. Parthemer (856) 848-4071

Hudson County Bar Association
Lawyer Referral Service
583 Newark Ave., Jersey City 07306
(201) 798-2727; Fax: (201) 798-1740
E-mail: hcba.law@verizon.net

Director: Lisa Burke (201) 798-4708

Hunterdon County Bar Association
Lawyer Referral Service
P.O. Box 573, Annandale 08801
(908) 236-6109; Fax: (908) 236-6119
Internet: www.huntcolaw.org
Director: Jeannine Gorman

Mercer County Bar Association
Lawyer Referral Service
1245 Whitehorse Mercerville Rd., Suite 420,
Hamilton 08619-3894
(609) 585-6200; Fax: (609) 585-5537
E-mail: info@mercerbar.com
Director: Francine Kowalczyk

Middlesex County Bar Association
Lawyer Referral Service
87 Bayard St., New Brunswick 08901
(732) 828-0053
Internet: www.mcbalaw.com
Exec. Dir.: Jonathan P. Cowles
E-mail: jcowles@mcbalaw.com
Administrator: Pattyann Fulda
E-mail: pfulda@mcbalaw.com

Monmouth Bar Association
The Lawyer Referral Service
Courthouse, Freehold 07728
(732) 431-5544; Fax: (732) 431-2843
Exec. Dir.: Tracey A. Maciewicz

Morris/Sussex County Bar Association
Lawyer Referral Service
28 Schuyler Pl., Morristown 07960
(973) 267-5882; Fax: (973) 605-8325
Coordinator: Lucy Littenberger
(973) 267-6089, Ext. 12

Ocean County Bar Association
Lawyer Referral Service
Courthouse, P.O. Box 381, Toms River 08753
(732) 240-3666; Fax: (732) 240-4907
E-mail: ocba@verizon.net
Director: Karin Poola

Passaic County Bar Association
Lawyer Referral Service
Courthouse, 2nd Floor, 77 Hamilton St., Paterson 07505
(973) 278-9223
Secretary: Dianne Grosso

Salem County Bar Association
Lawyer Referral Service
(856) 935-5629

Somerset County Bar Association
Lawyer Referral Service
Courthouse, 5th Floor, 20 N. Bridge St., P.O. Box 1095,
Somerville 08876
(908) 685-2323; Fax: (908) 685-9839
E-mail: info@somersetbar.com
Internet: www.somersetbar.com
Exec. Dir.: Hedily S. Wendover
E-mail: hwendover@somersetbar.com

Union County Bar Association
Lawyer Referral Service
Courthouse, 1st Floor, Elizabeth 07207
(908) 353-4715; Fax: (908) 354-8222
Exec. Dir.: Jeffrey M. Clar
Administrator: Tracy Foster
Mon.-Thurs, 10 A.M.-1 P.M.

Warren County Bar Association
Lawyer Referral Service
413 Second St., Belvidere 07823
(908) 387-1835
E-mail: warrencountybar@yahoo.com
Exec. Dir.: Maura Poquat

CAMDEN COUNTY
SUPERIOR COURT
HALL OF JUSTICE
CAMDEN NJ 08103

COURT TELEPHONE NO. (856) 379-2200
COURT HOURS 8:30 AM - 4:30 PM

TRACK ASSIGNMENT NOTICE

DATE: JULY 19, 2016
RE: JACOB VS LINDENWOLD BOROUGH OF
DOCKET: CAM L -002631 16

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 ROBERT G. MILLENKY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 101
AT: (856) 379-2200 EXT 3060.

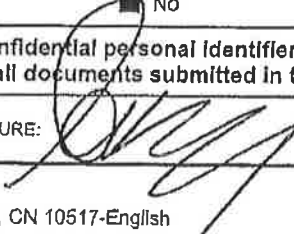
IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: SAUL J. STEINBERG
ZUCKER STEINBERG & WIXTED PA
415 FEDERAL STREET
CAMDEN NJ 08103-1122

JUAKTS

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for Initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, 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 SAUL J. STEINBERG, ESQUIRE		TELEPHONE NUMBER (856) 365-0080	COUNTY OF VENUE Camden
	FIRM NAME (if applicable) ZUCKER STEINBERG & WIXTED, P.A.		DOCKET NUMBER (when available) CAM-L- 2631-16	
	OFFICE ADDRESS 415 FEDERAL STREET CAMDEN, NJ 08103		DOCUMENT TYPE COMPLAINT JURY DEMAND ☒ Yes ☐ No	
NAME OF PARTY (e.g., John Doe, Plaintiff) JOSEPH JACOB, PLAINTIFF		CAPTION Joseph Jacob vs. Borough of Lindenwold, et al		
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. IF YES, LIST DOCKET NUMBERS		
RELATED CASES PENDING? ☐ Yes ☒ No				
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		
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 1:38-7(b)</i> .				
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)
- 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)
- 606 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 | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 291 PELVIC MESH/GYNECARE |
| 278 ZOMETHA/AREXIA | 292 PELVIC MESH/BARD |
| 279 GADOLINIUM | 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 |
| 288 PRUDENTIAL TORT LITIGATION | 601 ASBESTOS |
| 289 REGLAN | 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

ZUCKER STEINBERG & WIXTED
By: Saul J. Steinberg
Attorney Id: 009271973
415 Federal Street
Camden, New Jersey 08103
(856) 365-0080
Attorneys for Plaintiff



JOSEPH JACOB

Plaintiff,

v.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – CAMDEN COUNTY
DOCKET NO.: CAM-L-

Civil Action

24 31-16

BOROUGH OF LINDENWOLD;
LINDENWOLD POLICE DEPARTMENT;
DETECTIVE RONALD D. BURROWS JR.;
DETECTIVE CORTES; PATROLMAN
GALLEGOS; DETECTIVE ROMEO;
WINSLOW TOWNSHIP POLICE
DEPARTMENT; DETECTIVE MORGAN;
CAMDEN COUNTY SHERIFF'S DEPARTMENT;
JOHN/JANE DOES 1-100, fictitious persons;
ABC CORP. 1-100, fictitious entities

COMPLAINT, JURY DEMAND,
AND CERTIFICATIONS

Defendants.

Plaintiff, JOSEPH JACOB, by and through his attorneys, Zucker Steinberg & Wixedt,
P.A., by way of Complaint against the defendants allege as follows:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff, JOSEPH JACOB, is an adult individual who at all times material hereto resided at 2050 Winthorpe Avenue, in the Borough of Lindenwold, County of Camden and State of New Jersey.
2. Defendant, BOROUGH OF LINDENWOLD, upon information and belief, is a public and/or municipal entity in the County of Camden and State of New Jersey. For purposes of this litigation, defendant, Borough of Lindenwold maintains its principal place of

business at 15 North White Horse Pike in the Borough of Lindenwold, County of Camden and State of New Jersey.

3. Defendant, LINDENWOLD POLICE DEPARTMENT, upon information and belief, is a public and/or municipal entity organized and/or authorized to conduct law enforcement activities within the Borough of Lindenwold, County of Camden and State of New Jersey. For purposes of this litigation, defendant, LINDENWOLD POLICE DEPARTMENT maintains its principal place of business at 2001 Egg Harbor Road in the Borough of Lindenwold, County of Camden and State of New Jersey.
4. Defendant, DETECTIVE RONALD D. BURROWS JR., was at all times material hereto, a sworn officer of defendant, LINDENWOLD POLICE DEPARTMENT, and performed all acts pursuant to his/her duties as an officer of same. For purposes of this litigation, defendant, DETECTIVE RONALD D. BURROWS JR.'s, (badge number 2267), address is in the care of defendant, LINDENWOLD POLICE DEPARTMENT, 2001 Egg Harbor Road in the Borough of Lindenwold, County of Camden and State of New Jersey.
5. Defendant, DETECTIVE CORTES, was at all times material hereto, a sworn officer of defendant, LINDENWOLD POLICE DEPARTMENT, and performed all acts pursuant to his/her duties as an officer of same. For purposes of this litigation, defendant, DETECTIVE CORTES' address is in the care of defendant, LINDENWOLD POLICE DEPARTMENT, 2001 Egg Harbor Road in the Borough of Lindenwold, County of Camden and State of New Jersey.
6. Defendant, PATROLMAN GALLEGOS, was at all times material hereto, a sworn officer of defendant, LINDENWOLD POLICE DEPARTMENT, and performed all acts pursuant to his/her duties as an officer of same. For purposes of this litigation, defendant,

PATROLMAN GALLEGOS, address is in the care of defendant, LINDENWOLD POLICE DEPARTMENT, 2001 Egg Harbor Road in the Borough of Lindenwold, County of Camden and State of New Jersey.

7. Defendant, DETECTIVE ROMEO, was at all times material hereto, a sworn officer of defendant, LINDENWOLD POLICE DEPARTMENT, and performed all acts pursuant to his/her duties as an officer of same. For purposes of this litigation, defendant, DETECTIVE ROMEO, address is in the care of defendant, LINDENWOLD POLICE DEPARTMENT, 2001 Egg Harbor Road in the Borough of Lindenwold, County of Camden and State of New Jersey.
8. Defendant, DETECTIVE MORGAN, was at all times material hereto, a sworn officer of defendant, WINSLOW TOWNSHIP POLICE DEPARTMENT, and performed all acts pursuant to his/her duties as an officer of same. For purposes of this litigation, defendant, DETECTIVE ROMEO, address is in the care of defendant, WINSLOW TOWNSHIP POLICE DEPARTMENT, 125 South Route 73 Braddock, New Jersey.
9. Defendant, WINSLOW TONWHSIP POLICE DEPARTMENT, upon information and belief, is a public and/or municipal entity organized and/or authorized to conduct law enforcement activities within the Borough of Lindenwold, County of Camden and State of New Jersey. For purposes of this litigation, defendant, WINSLOW TOWNSHIP POLICE DEPARTMENT maintains its principal place of business at 125 South Route 73 Braddock, New Jersey.
10. Defendant, CAMDEN COUNTY SHERIFF'S DEPARTMENT, upon information and belief, is a public and/or municipal entity organized and/or authorized to conduct law enforcement activities within Camden County New Jersey. For purposes of this

litigation, defendant, CAMDEN COUNTY SHERIFF'S DEPARTMENT maintains its principal place of business at 520 Market Street in Camden, New Jersey.

11. Defendants JOHN/JANE DOES 1-25, fictitious officers and/or employees of defendant, LINDENWOLD POLICE DEPARTMENT, were at all times herein, under the employ of defendant, LINDENWOLD TOWNSHIP POLICE DEPARTMENT, and performed all acts pursuant to his/her duties as an officer of same and/or individuals to this action who in some manner contributed to the damages and injuries sustained by plaintiff. Plaintiff hereby reserves the right to substitute the name(s) of the actual party(s) if and when the identity(s) of said individual(s) or business(s) is/are obtained.
12. Defendants JOHN/JANE DOES 26-100 and/or ABC CORP. 1-100 is/are/were at all relevant times herein, employees, agents, and/or affiliates of defendant(s) the actual identity(s) of which are unknown to plaintiff at this time. Plaintiff will amend this Complaint at such time as the identity(s) of these fictitious defendants become known throughout the course of continuing investigation and discovery.
13. This Court has jurisdiction over the defendants because the defendant(s) transacted business within and/or are residents of the State of New Jersey at all times relevant to this Complaint.
14. Venue for this action properly lies in Camden County, pursuant to R. 4:3-2(a), because this action is laid in the county in which the cause of action arose.

FACTUAL BACKGROUND

1. Plaintiff repeats and re-alleges each and every allegation of prior sections/counts as if fully set forth herein at length.
2. On or about July 24, 2014, at approximately 1:30 P.M., plaintiff, JOSEPH JACOB, was lawfully present at 1811 Arborwood Condominiums which is located at 511 East Gibbsboro Road in the Borough of Lindenwold, County of Camden and State of New Jersey (hereinafter "the premises").
3. At all times material hereto, defendants, DETECTIVE RONALD D. BURROWS JR.; DETECTIVE CORTES; PATROLMAN GALLEGOS; DETECTIVE ROMEO; were acting under color of law as sworn law enforcement officers of defendant, BOROUGH OF LINDENWOLD and/or LIDENWOLD POLICE DEPARTMENT.
4. At all times material hereto, defendant, DETECTIVE MORGAN was acting under color of law as a sworn law enforcement officer of defendant, WINSLOW TOWNSHIP POLICE DEPARTMENT.
5. On or about July 24, 2014 at approximately 1:30 P.M., defendant, CAMDEN COUNTY SHERIFF'S DEPARTMENT executed a search warrant for Unit 1701 Arborwood Condos.
6. On or about July 24, 2014 at approximately 1:30 P.M., defendants DETECTIVE RONALD D. BURROWS JR.; DETECTIVE CORTES; PATROLMAN GALLEGOS; DETECTIVE ROMEO and DETECTIVE MORGAN conducted a search of the aforementioned premises including the unit and its occupants.
7. At all times material hereto, plaintiff was neither a tenant nor a temporary occupant at the aforementioned premises.

8. At all times material hereto, plaintiff had no economic or possessory interest in the aforementioned premises.
9. Defendants arrested plaintiff and charged him with possession of a controlled dangerous substance, possession of drug related paraphernalia and being under the influence of a controlled dangerous substance.
10. After this event occurred, plaintiff felt confused, dazed, paranoid, emotionally disturbed, and sick.
11. Plaintiff is still traumatized from this occurrence and both suffer from mental injuries and general paranoia on a permanent basis.
12. Plaintiff was falsely arrested, deprived of his constitutional rights, victim of police brutality, and suffered injuries, including, but not limited to, embarrassment, humiliation, loss of freedom and dignity, fear for his life, health, and safety. These injuries were the consequence of all of the defendants' wrongful, negligent and/or intentional conduct, and moreover, as a consequence of the above mentioned defendants' failure and/or refusal to eliminate and/or discontinue said conduct and/or a policy and/or atmosphere and environment of wrongful conduct.
13. Plaintiff was unjustly incarcerated from approximately July 24, 2014 through September 25, 2014 at which time he was released as the aforementioned charges were dropped.

FIRST COUNT

1. Plaintiff repeats and re-alleges each and every allegation of prior sections/counts as if fully set forth herein at length.
2. The said arrest and detention was entirely unjustified by any actions of the plaintiff.
3. This Cause of Action is brought by plaintiff against defendants, BOROUGH OF

LINDENWOLD; LINDENOWLD POLICE DEPARTMENT; DETECTIVE RONALD D. BURROWS JR.; DETECTIVE CORTES; PATROLMAN GALLEGOS; DETECTIVE ROMEO; WINSLOW TOWNSHIP POLICE DEPARTMENT; DETECTIVE MORGAN; CAMDEN COUNTY SHERIFF'S DEPARTMENT; JOHN/JANE DOES 1-100, fictitious persons, and ABC CORP. 1-100, fictitious entities, for deprivation of constitutional rights within the meaning of 42 U.S.C. § 1983 and the Constitution of the State of New Jersey.

4. The above-described actions subjected plaintiff to a deprivation of rights and privileges secured to plaintiff by the Constitution and laws of the United States, including the due process clause of the Fourteenth Amendment to the Constitution of the United States, within the meaning of 42 U.S.C. § 1983 and the Constitution of the State of New Jersey.
5. All Defendants are liable, jointly, individually, and severally, for the actions of BOROUGH OF LINDENWOLD; LINDENOWLD POLICE DEPARTMENT; DETECTIVE RONALD D. BURROWS JR.; DETECTIVE CORTES; PATROLMAN GALLEGOS; DETECTIVE ROMEO; WINSLOW TOWNSHIP POLICE DEPARTMENT; DETECTIVE MORGAN; CAMDEN COUNTY SHERIFF'S DEPARTMENT; JOHN/JANE DOES 1-100, fictitious persons, and ABC CORP. 1-100, fictitious entities, since all defendants were present and/or in some manner involved in the events detailed above.
6. Moreover, the abovementioned defendants in this Complaint acted individually and/or agreed and/or conspired and/or acted in concert to subject plaintiff to a Deprivation of his Constitutional Rights.

7. The actions alleged above deprived plaintiff of the following rights under the New Jersey

Constitution and United States Constitution as follows:

- a. Freedom from the use of excessive and unreasonable force;
- b. Freedom from a deprivation of liberty without due process of law;
- c. Freedom from summary punishment;
- d. Equal protection under the law.

8. All defendants subjected plaintiff to such deprivations by either malice or a reckless disregard of Plaintiff's rights.

9. The direct and proximate result of all defendants' acts is that plaintiff has suffered severe injuries to his person; embarrassment; humiliation; loss of freedom and dignity; fear for his life, health and safety; mental anguish, and paranoia of both a temporary and permanent nature, and deprivation of his physical liberty and deprivation of his rights as a citizen of the United States.

WHEREFORE plaintiff demands judgment against defendants as follows:

- a. entering a declaratory judgment that the Deprivation of Constitutional Rights complained of herein has violated the rights of plaintiff;
- b. granting Plaintiff judgment for compensatory damages for all pain and suffering;
- c. granting Plaintiff punitive and exemplary damages against all Defendant's listed in this Complaint;
- d. awarding Plaintiff reasonable attorney's fees, costs and disbursements;
- e. awarding Plaintiff pre-judgment interest at the prevailing rate; and
- f. granting such other relief as this Court deems just and equitable.

SECOND COUNT

1. Plaintiff repeats and re-alleges each and every allegation of prior sections/counts as if fully set forth herein at length.
2. On or about July 24, 2014, defendant, BOROUGH OF LINDENWOLD;
LINDENWOLD POLICE DEPARTMENT; WINSLOW TOWNSHIP POLICE
DEPARTMENT permitted, encouraged, tolerated and ratified a pattern and practice of:

- a. unjustified and unreasonable False Arrests; and/or
 - b. policies and/or conditions that deprived citizens of their constitutional rights; and/or
 - c. policies and/or conditions that permitted, encouraged, or allowed malicious prosecutions and/or abusive police practices to take place.
3. Upon reasonable information and belief, all of the above-mentioned defendants failed to discipline, prosecute, or in any manner deal with anyone involved in this tragic event.
4. By means of inaction of investigating such occurrences, the above-mentioned defendants encouraged police officers and/or detectives/prosecutors employed by it/them to believe that unreasonable force during arrest, and/or wrongful threats and/or actions that deprive citizens of their constitutional rights and/or Malicious Prosecutions were permissible actions.
5. The above-mentioned defendant has maintained no, or an inadequate system of review of unlawful arrests. This system has failed to identify instances of unlawful arrests, more closely supervise, or retrain officers who in fact improperly effected unlawful arrests.
6. Upon said information and belief, the systemic deficiencies include but are not limited to:
 - a. preparation of investigative reports which uncritically rely solely on the word of police officers involved in the incidents and which systematically fail to credit testimony by non-police officer witnesses; and/or
 - b. preparation of reports which omit factual information and physical evidence which contradicts the accounts of the officers involved.
7. Defendant also maintained a system that had inadequate training in police practices, including training pertaining to the law(s) regarding effecting lawful arrests in that such program, if any existed, failed to protect the plaintiff in this litigation.
8. The foregoing acts, omissions, and systemic deficiencies are policies and customs of all defendants listed in this count of the Complaint caused police officers of the above mentioned defendant to be unaware of the rules and laws governing lawful arrests and to

believe that the decision to effect an arrest upon plaintiff was entirely within the discretion of the officer and that improper usage would not be honestly and properly investigated, all with the foreseeable result that officers are more likely to unlawful arrests in situations where such an arrest is neither reasonable under these circumstances, nor legal.

9. As a direct and proximate result of the aforesaid acts, omissions, systemic deficiencies, policies and customs of defendant improperly committed an unlawful arrest, and/or depriving plaintiff of his constitutional rights and/or improperly caused a malicious prosecution to occur all to the detriment of plaintiff.

WHEREFORE, Plaintiff demands judgment against defendant, BOROUGH OF LINDENWOLD; LINDENWOLD POLICE DEPARTMENT and/or WINSLOW TOWNSHIP POLICE DEPARTMENT as follows:

- a. entering a declaratory judgment that the acts complained of herein has violated the rights of Plaintiff;
- b. granting Plaintiff judgment for compensatory damages for all pain and suffering;
- c. granting Plaintiff punitive and exemplary damages against all Defendants listed in this count of the Complaint;
- d. awarding Plaintiff reasonable attorney's fees, costs and disbursements;
- e. awarding Plaintiff pre-judgment interest at the prevailing rate;
- f. granting such other relief as this Court deems just and equitable.

THIRD COUNT

1. Plaintiff repeats and re-alleges each and every allegation of prior sections/counts as if fully set forth herein at length.
2. This Cause of Action is brought by plaintiff against defendants, BOROUGH OF LINDENWOLD; LINDENOWLD POLICE DEPARTMENT; DETECTIVE RONALD D. BURROWS JR.; DETECTIVE CORTES; PATROLMAN GALLEGOS; DETECTIVE ROMEO; DETECTIVE MORGAN; WINSLOW TOWNSHIP POLICE

DEPARTMENT; CAMDEN COUNTY SHERIFF'S DEPARTMENT; JOHN/JANE
DOES 1-100, fictitious persons, and ABC CORP. 1-100, fictitious entities for negligence.

3. The direct and proximate result of all defendants' negligent acts is that plaintiff has suffered severe injuries including, but not limited to: injuries to his person; embarrassment; humiliation; loss of freedom and dignity; fear for his life, health and safety; mental anguish, and paranoia of both a temporary and permanent nature, and deprivation of his physical liberty and deprivation of his rights as a citizen of the United States.

WHEREFORE plaintiff demands judgment against defendants as follows:

- g. entering a declaratory judgment that the Deprivation of Constitutional Rights complained of herein has violated the rights of plaintiff;
- h. granting Plaintiff judgment for compensatory damages for all pain and suffering;
- i. granting Plaintiff punitive and exemplary damages against all Defendant's listed in this Complaint;
- j. awarding Plaintiff reasonable attorney's fees, costs and disbursements;
- k. awarding Plaintiff pre-judgment interest at the prevailing rate; and
- l. granting such other relief as this Court deems just and equitable.

FOURTH COUNT

1. Plaintiff repeats and re-alleges each and every allegation of prior sections/counts as if fully set forth herein at length.
2. This Cause of Action is brought by plaintiff against defendants, BOROUGH OF LINDENWOLD; LINDENOWLD POLICE DEPARTMENT; DETECTIVE RONALD D. BURROWS JR.; DETECTIVE CORTES; PATROLMAN GALLEGOS; DETECTIVE ROMEO; DETECTIVE MORGAN; WINSLOW TOWNSHIP POLICE DEPARTMENT; CAMDEN COUNTY SHERIFF'S DEPARTMENT; JOHN/JANE DOES 1-100, fictitious persons, and ABC CORP. 1-100, fictitious entities for gross negligence.

3. The direct and proximate result of all defendants' grossly negligent acts is that plaintiff has suffered severe injuries including, but not limited to: injuries to his person; embarrassment; humiliation; loss of freedom and dignity; fear for his life, health and safety; mental anguish, and paranoia of both a temporary and permanent nature, and deprivation of his physical liberty and deprivation of his rights as a citizen of the United States.

WHEREFORE plaintiff demands judgment against defendants as follows:

- a. entering a declaratory judgment that the Deprivation of Constitutional Rights complained of herein has violated the rights of plaintiff;
- b. granting Plaintiff judgment for compensatory damages for all pain and suffering;
- c. granting Plaintiff punitive and exemplary damages against all Defendant's listed in this Complaint;
- d. awarding Plaintiff reasonable attorney's fees, costs and disbursements;
- e. awarding Plaintiff pre-judgment interest at the prevailing rate; and
- f. granting such other relief as this Court deems just and equitable.

FIFTH COUNT

1. Plaintiff repeats and re-alleges each and every allegation of prior sections/counts as if fully set forth herein at length.
2. This Cause of Action is brought by plaintiff against defendants, BOROUGH OF LINDENWOLD; LINDENOWLD POLICE DEPARTMENT; DETECTIVE RONALD D. BURROWS JR.; DETECTIVE CORTES; PATROLMAN GALLEGOS; DETECTIVE ROMEO; DETECTIVE MORGAN; WINSLOW TOWNSHIP POLICE DEPARTMENT; CAMDEN COUNTY SHERIFF'S DEPARTMENT; JOHN/JANE DOES 1-100, fictitious persons, and ABC CORP. 1-100, fictitious entities for malicious prosecution.

3. The abovementioned defendants acted individually and/or agreed and/or conspired and/or acted in concert to falsely and maliciously initiate a criminal prosecution of plaintiff.
4. Among the acts pursuant to such conspiracy and agreement, defendants had no probable cause or other reason to arrested and/or investigate the plaintiff for the purpose of procuring said criminal prosecution.
5. As a proximate result of the Malicious Criminal Investigation initiated by the above-mentioned defendants, plaintiff has suffered severe injuries including, but not limited to: fear of imminent bodily injury, fear for their lives, humiliation, embarrassment, paranoia, loss of freedom, loss of dignity, and plaintiff was forced to endure great mental suffering and general paranoia of both a temporary and permanent nature.
6. The acts of the above-mentioned defendants were willful, wanton, malicious and oppressive and were motivated solely by a desire to harm plaintiff; or by hatred of, or ill-will toward, plaintiff. Such acts therefore deserve an award of punitive damages.

WHEREFORE, plaintiff demands judgment as follows:

- a. entering a declaratory judgment that the Malicious Prosecution complained of herein has violated the rights of plaintiff;
- b. granting plaintiff judgment for compensatory damages and for all pain and suffering;
- c. granting plaintiff punitive and exemplary damages against defendants;
- d. awarding plaintiffs reasonable attorney's fees, costs and disbursements;
- e. awarding plaintiff pre-judgment interest at the prevailing rate;
- f. granting such other relief as this Court deems just and equitable.

JURY DEMAND

Plaintiff demands a trial by jury of the within issues.

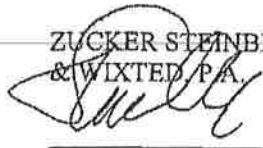
NOTICE OF DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Saul J. Steinberg, Esquire as Trial Counsel.

CERTIFICATION PURSUANT TO R.4:5-1

I certify that, to the best of my knowledge, the matter in controversy is not the subject matter of another action pending in any or any pending arbitration proceeding and no other action or arbitration proceeding is contemplated. At the present time, I do not know the names of any other parties who should be joined in this action.

ZUCKER STEINBERG
& WIXTED, P.A.


SAUL J. STEINBERG
Attorney for Plaintiff

Date: 7/15/16