

NEW MILFORD BOROUGH CLERK
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2015 DEC 11 P 4: 50

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E-mail:
Attorney(s) for Plaintiff(s): Joseph Hoo

Joseph Hoo

Plaintiff(s)

vs.

New Milford Borough

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
BERGEN COUNTY

DOCKET NO.: BER-L-10297-15

CIVIL ACTION

Summons

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 provided and available in the Civil Division Management Office in the county listed above or online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) 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 (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 provided and available online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Dated: **December 10, 2015**


Michelle M. Smith /ss/

Clerk of the Superior Court

Name of Defendant to be Served: **New Milford Borough**

Address of Defendant to be Served: **C/o Christine Demiris, Clerk**

930 River Rd. New Milford Borough, NJ 07646

ATLANTIC COUNTY

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

BERGEN COUNTY

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main Street
Hackensack, NJ 07601
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
(609) 261-1088

CAMDEN COUNTY

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice, First Floor
101 South Fifth Street, Suite 150
Camden, NJ 08108
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY

Deputy Clerk of the Superior Court
9 North Main Street
Cape May Court House, NJ 08210
LAWYER REFERRAL
(609) 463-0318
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street, P.O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
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
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5860

HUDSON COUNTY

Deputy Clerk of the Superior Court
Superior Court, Civil Records Department
Brennan Court House, First Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6863

HUNTERDON COUNTY

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 286-6109
LEGAL SERVICES
(908) 782-7979

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

MIDDLESEX COUNTY

Deputy Clerk of the Superior Court
Middlesex Vicinage
Second Floor - Tower
56 Paterson Street, P.O. 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
P.O. Box 1269
Freehold, NJ 07723-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY

Morris County Courthouse
Civil Division
Washington and Court Streets
P.O. Box 910
Morristown, NJ 07963-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY

Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08764-2191
LAWYER REFERRAL
(732) 240-8666
LEGAL SERVICES
(732) 841-2727

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) 528-2900

SALEM COUNTY

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 8000
40 North Bridge Street
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 281-0840

SUSSEX COUNTY

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-6882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY

Deputy Clerk of the Superior Court
First Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-6078
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 364-4840

WARREN COUNTY

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500
LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

Updated: 8/21/18

BERGEN COUNTY COURTHOUSE
SUPERIOR COURT LAW DIV
BERGEN COUNTY JUSTICE CTR RM 415
HACKENSACK NJ 07601-7680

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 527-2600
COURT HOURS 8:30 AM - 4:30 PM

DATE: DECEMBER 04, 2015
RE: HOO VS KAM
DOCKET: BER L -010297 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 DEPENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON LISA PEREZ-PRISCIA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (201) 527-2600.

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: JEFFREY M. PATTI
PATTI & PATTI
255 WOODPORT ROAD
SEARTA NJ 07871

JUBCOS0

PATTI & PATTI, LLC
 Jeffrey M. Patti, Esq. (#050201998)
 255 Woodport Road
 Sparta, New Jersey 07871
 (973) 729-5040
 Attorneys for Plaintiff

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NOV 30 2015

SUPERIOR COURT OF NEW JERSEY
 COUNTY OF BERGEN
 FINANCE DIVISION

JOSEPH HOO,

Plaintiff,

v.

ERIC KAM, BRIAN CARLINO,
 MICHAEL LAFRANO, DANIEL
 LAMORGES, KEVIN VAN SADERS,
 FRANCIS PAPAPIETRO, NEW
 MILFORD POLICE DEPARTMENT,
 NEW MILFORD BOROUGH, and
 John Doe 1-20: (OFFICERS and/or
 SUPERVISORS OF NEW MILFORD
 BOROUGH POLICE DEPARTMENT)
 fictitious names representing a series of
 individuals having actual identities
 unknown to Plaintiff at this time,

Defendants.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION: BERGEN COUNTY

DOCKET NO.: BER-L- 10297-15

Civil Action

COMPLAINT AND JURY DEMAND

SUPERIOR COURT BERGEN COUNTY
FILED

NOV 30 2015

Tana J. Smallman
 DEPUTY CLERK

Plaintiff Joseph Hoo, residing in Upper Montclair (Montclair Township), Essex County,
 New Jersey, by way of Complaint against the Defendants herein says:

PLEADINGS COMMON TO ALL COUNTS

1. At all times relevant herein, Plaintiff Joseph Hoo was a resident of the State of New Jersey residing at the above location.
2. At all times relevant, Defendant Eric Kam was a resident of New Milford Borough, County of Bergen, and State of New Jersey.

3. At all times relevant herein, the public entity Defendant, Upper Montclair, was duly organized under the laws of the State of New Jersey.

4. Defendant Brian Carlino (hereinafter "Carlino") was at all times relevant herein a police officer in New Milford Borough Police Department and was responsible for upholding and enforcing the law and maintaining the peace in New Milford Borough, and was at all times relevant herein an arresting officer of Plaintiff. He is sued in his individual capacity.

5. Defendant Michael Lafrano (hereinafter "Lafrano") was at all times relevant herein a police officer in New Milford Borough Police Department and was responsible for upholding and enforcing the law and maintaining the peace in New Milford Borough, and was at all times relevant herein an arresting officer of Plaintiff. He is sued in his individual capacity.

6. Defendant Kevin Van Sadars was at all times relevant herein a detective in New Milford Borough Police Department and was responsible for upholding and enforcing the law and maintaining the peace in New Milford Borough, and was at all times relevant herein an arresting officer of Plaintiff. He is sued in his individual capacity.

7. Defendant Daniel Lamorges (hereinafter "Lamorges") was at all times relevant herein a police officer in New Milford Borough Police Department with the supervisory rank of sergeant and was responsible for upholding and enforcing the law and maintaining the peace in New Milford Borough and upon information and belief was also responsible for creating and implementing policy statements, ordinances, regulations, official decisions and well settled customs and practices, and was at all times relevant responsible for oversight, supervision and training of subordinate officers in the department and was at all times relevant herein an arresting officer of Plaintiff. He is sued in his individual and official capacity.

8. Defendant Francis Papapietro (hereinafter "Papapietro") was at all times relevant herein the police chief for New Milford Borough Police Department and was responsible for upholding and enforcing the law and maintaining the peace in New Milford Borough and was also responsible for creating and implementing policy statements, ordinances, regulations, official decisions and well settled customs and practices, and was at all times relevant responsible for oversight, supervision and training of subordinate officers in the department. He is sued individually and in his official capacity.

9. Defendant New Milford Borough (hereinafter "New Milford") is a Municipal entity incorporated pursuant to the Municipal Laws of the State of New Jersey and at all times relevant hereto maintained a police department and furthermore, at all times relevant hereto had the duty to exercise its powers and authority over the police department pursuant to N.J.S.A. 40A:14-118, et. seq. and to provide training, supervision and/or overall management of the New Milford Borough Police Department.

10. Defendant John Doe 1-20 are fictitious law enforcement officers and/or supervisors whose identities are unknown at this time, and at all times relevant hereto were responsible for the investigation and/or enforcement of the laws within New Milford Borough and/or may have been responsible, directly and/or indirectly, for the oversight, supervision and training of subordinate Defendants. At such time as their identities become known, this Complaint will be amended to name the known persons. They are sued individually and in their official capacity.

COUNT ONE

(Malicious Representation-Deceit-Defendant Kam)

11. Plaintiff repeats the allegations and/or statements in the preceding paragraphs as if the same were set forth herein at length.

12. On November 28, 2013, Defendant Kam contacted 911 emergency dispatch and/or New Milford Borough Police Department and falsely and maliciously reported *inter alia* that Plaintiff threatened to kill Defendant Kam with a machete. Moments later, Defendant Kam repeated the same false and malicious allegation to New Milford Borough Police officers. Later that day, Defendant Kam repeated the same false and malicious allegation in a sworn affidavit presented to the New Milford Borough Police Department.

13. Defendant Kam made this false and malicious statement to law enforcement knowing the statement was false without any belief in their truth, and/were stated in reckless or careless disregard of the truth of the statements.

14. Defendant Kam made the false and malicious statements with the purpose of inducing another to act upon the false representations.

15. On said date and at all times relevant, Plaintiff never physically possessed a machete nor did he threaten to kill anyone.

16. As a result of the false and malicious statements, and false sworn affidavit made by Defendant Kam to New Milford Borough Police Department, Plaintiff was charged with three felony level charges under the New Jersey Criminal code, under Complaint-Warrant W-2013-000143-0238, *to wit*, N.J.S.A. 2C:12-3(b), Terroristic Threats, a crime of the third degree, N.J.S.A. 2C:39-5(d), Unlawful Possession of a Weapon, a crime of the third degree¹, and N.J.S.A. 2C:39-4(d), Possession of a Weapon for Unlawful Purpose, a crime of the third degree.²

¹ While Plaintiff was charged with a third degree offense under N.J.S.A. 2C:39-5(d), said offense is a crime of the fourth degree under complaint number W-2013-000143-0238 with a third degree offense,

² On February 10, 2014 the Bergen County Prosecutor downgraded the felony charges to the petty disorderly persons offenses of harassment, N.J.S.A. 2C:33-4(a), and two counts of disorderly conduct, improper behavior, N.J.S.A. 2C:33-2(a)(2).

17. As a direct and proximate result of Defendant Kam's false and malicious misrepresentations aforesaid, Plaintiff was caused *inter alia* permanent emotional harm, harm to his reputation, and caused to expend significant sums to clear his name.

WHEREFORE, Plaintiff demands judgment against Defendant Kam for compensatory and punitive damages, together with interest, costs of suit, attorney's fees and such other and further relief as the court deems proper.

COUNT TWO

(Malicious Prosecution-Defendant Kam)

18. Plaintiff repeats the allegations and/or statements in the preceding paragraphs as if the same were set forth herein at length.

19. On June 30, 2014, again Defendant Kam presented to New Milford Borough Police Department and prepared and signed a Certification in Support of Probable Cause wherein he falsely and maliciously certified that on November 28, 2013, Plaintiff was "screaming standing in front of my house swinging a machete." In said certification, Defendant Kam further falsely and maliciously alleged that Plaintiff threatened him with personal harm and "on multiple occasions Joe tried to charge up the grass" towards Defendant Kam. In various material aspects the June 30, 2014 certification was inconsistent with the November 28, 2013 sworn Affidavit.

20. Defendant Kam made these additional false and malicious statements knowing the statements were false without any belief in their truth, and/were stated in reckless or careless disregard of the truth of the statements.

21. Based upon the false and malicious allegations contained in the June 30, 2014 Certification in Support of Probable Cause, Defendant Kam maliciously filed a criminal complaint under Complaint-Summons S-2014-000085-0238 falsely charging Plaintiff with

violation of N.J.S.A. 2C:12-1(a)(3), Simple Assault, a Disorderly Persons Offense in the New Milford Municipal Court.

22. Said complaint was filed without probable cause and without a reasonable ground of suspicion supported by circumstances sufficient to warrant an ordinarily prudent person in believing Plaintiff was guilty of the offense of simple assault.

23. On said date and at all times relevant, Plaintiff never assaulted or attempted to assault anyone.

24. On December 2, 2014, Plaintiff was found not guilty of simple assault in the New Milford Municipal Court.³

25. As a result of Defendant Kam's malicious prosecution of Plaintiff, Plaintiff was arrested and charged with simple assault and was brought under the jurisdiction of a court tribunal requiring is appearance and the mounting of a defense.

26. As a direct and proximate result of Defendant Kam's malicious prosecution of Plaintiff, Plaintiff suffered damages, *inter alia* permanent emotional harm, harm to his reputation, restricted in his freedom and liberty, and was caused to expend significant sums to clear his name.

WHEREFORE, Plaintiff demands judgment against Defendant Kam for compensatory and punitive damages, together with interest, costs of suit, attorney's fees and such other and further relief as the court deems proper.

COUNT THREE

(New Jersey Civil Rights Act/New Jersey Constitution)

27. Plaintiff repeats the allegations and/or statements in the preceding paragraphs as if the same were set forth herein at length.

³ At the same trial, Plaintiff was found guilty of harassment and two counts of disorderly conduct. Said convictions are currently on appeal to the Superior Court of New Jersey, Bergen County.

28. The individual law enforcement Defendants, Carlino, Lafrano, Lamorges, Van Saders, Papapietro, and John Doe 1-20 named herein were at all times acting under the color of the law, statutes, ordinances and policies of the State of New Jersey and/or New Milford Borough.

29. On November 28, 2013, the Defendants Carlino, Lafrano, Lamorges, and Van Saders were dispatched to the home of Defendant Kam in New Milford Borough on a false report of terroristic threats and alleged unlawful possession of a machete.

30. At said time and place, at or near the premises of Defendant Kam, without probable cause of a crime being committed or a violation of the traffic laws of the State of New Jersey having been committed, Defendants effectuated an unlawful traffic stop of Plaintiff and ordered Plaintiff to exit his vehicle.

31. Without probable cause of the commission of a crime or being in the possession of illegal contraband and/or weapon(s), Defendants conducted an unlawful search of Plaintiff's vehicle and effectuated an unlawful arrest and/or detention of Plaintiff. As a result of the unlawful search and the assurance of Defendant Kam signing a sworn affidavit, Plaintiff was subjected to unreasonable and excessive force, unlawful search and seizure, false imprisonment, and malicious prosecution in violation of Plaintiff's rights guaranteed by the New Jersey Constitution and the New Jersey Civil Rights Act N.J.S.A. 10:6-2 causing him to suffer damage.

32. At all times relevant herein, Defendants deprived, interfered with and/or attempted to interfere by threats, intimidation and/or coercion with the exercise and/or enjoyment of Plaintiff of his substantive due process, equal protections rights, privileges and/or immunities secured by the Constitution and/or laws of the State of New Jersey and in violation of N.J.S.A. 10:6-2.

33. At all times relevant herein, Defendants violated Plaintiff's civil rights by falsely arresting Plaintiff, illegally seizing the person of Plaintiff, unlawfully searching Plaintiff and his property, maliciously prosecuting Plaintiff, and conspiring to commit the acts aforesaid.

34. As a direct and proximate result of Defendants violations of Plaintiffs civil rights guaranteed him by the New Jersey Constitution and by N.J.S.A. 10:6-2, Plaintiff suffered damages.

35. The civil rights violations aforesaid were committed by Defendants with actual malice and/or a wanton and willful disregard of persons who foreseeably might be harmed by Defendants actions.

36. As a direct and proximate result of the aforesaid actions of the aforementioned individual Defendants, Plaintiff was caused to suffer loss of liberty, humiliation and embarrassment, permanent emotional trauma, and was caused to expend great sums in legal fees.

WHEREFORE, Plaintiff demands judgment against the Defendants, Carlino, Lafrano, Lamorges, Van Saders, John Doe 1-20, and New Milford Borough for compensatory and punitive damages, together with interest, costs and attorney's fees.

COUNT FOUR

37. Plaintiff repeats the allegations and/or statements in the preceding paragraphs and/or counts as if the same were set forth herein at length.

38. Defendants Papapietro and John Doe 1-20, fictitious names representing individuals having actual identities unknown to Plaintiff at this time, but who are functionally identified as supervisory officers of the Borough of New Milford, are responsible for the training, supervision, control and discipline of the other named Defendants.

39. Said Defendants Papapietro and John 1-10 Supervisors, through a pattern and practice of systematically ignoring ongoing violation of the rights of citizens, and the conduct of Defendants named above in particular, endorsed and ratified the improper conduct of said individual Defendants.

40. The acts aforesaid were committed pursuant to a policy statement, ordinance, regulation, and/or decision officially adopted and promulgated by Defendants and/or a well settled custom or practice by Defendant Borough of New Milford Police Department.

41. The acts aforesaid were committed as a result of inadequate training and/or supervision by Defendants.

42. As a direct and proximate result of Defendants violations of Plaintiff's civil rights guaranteed to her by the New Jersey Constitution and N.J.S.A. 10:6-2, Plaintiff suffered damages.

43. The civil rights violations aforesaid were committed by Defendants with actual malice and/or a wanton and willful disregard of persons who foreseeably might be harmed by Defendants actions.

44. Plaintiff seeks punitive damages pursuant to N.J.S.A. 2A:15-5.10, et. seq.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damage, statutory damages, punitive damages, interest, costs and reasonable attorney's fees, and such other relief as this court deems just and proper.

COUNT FIVE
(Civil Conspiracy)

Plaintiff hereby repeats and re-alleges all of the allegations set forth above as if set forth at length herein.

45. At all times relevant herein, Defendants acted in concert to subject Plaintiff to false arrest, unlawful seizure, unlawful search, false imprisonment and/or malicious prosecution.

46. At all times relevant herein, Defendants entered into an agreement to subject Plaintiff to false arrest, false imprisonment and/or malicious prosecution.

47. At all times relevant herein, Defendants made overt acts in furtherance of their civil conspiracy to subject Plaintiff to false arrest, unlawful seizure, unlawful search, false imprisonment and or malicious prosecution.

48. As a direct and proximate result of the civil conspiracy Plaintiff was wrongfully detained and/or deprived of his freedom and liberty.

49. The actions aforesaid were committed by Defendants with actual malice and/or a wanton and willful disregard of persons, including Plaintiff, who foreseeably might be harmed by Defendants actions.

50. Plaintiff seeks punitive damages pursuant to N.J.S.A. 2A:15-5.10, et. seq.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damage, statutory damages, punitive damages, interest, costs and reasonable attorney's fees, and such other relief as this court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury as to all issues.

TRIAL ATTORNEY DESIGNATION

Jeffrey M. Patti, Esq. is hereby designated as trial counsel for Plaintiff.

CERTIFICATION PURSUANT TO RULE 4:5-1

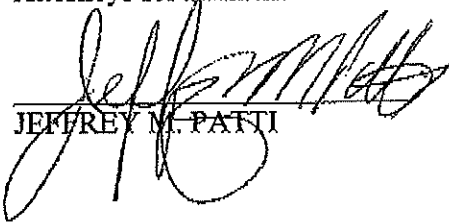
Pursuant to Rule 4:5-1, the undersigned certifies that to the best of his knowledge, the within matters in controversy are the subject of another New Jersey Superior Court matter entitled Joseph Hoo v. Eric Kam, ESX-L-5344-15.

DEMAND FOR INSURANCE AGREEMENTS

Plaintiff hereby demands pursuant to R. 4:10-2(b) a copy of the contents of any insurance agreement and the coverage terms thereof, under which an insurance carrier may be liable to satisfy any or all of a judgment that may be entered in an action or to indemnify or reimburse for payments made to satisfy the judgment.

PATTI & PATTI, LLC
Attorneys for Plaintiff

By:


JEFFREY M. PATTI

Dated: November 27, 2015