

PLAINFIELD CITY CLERK'S OFFICE
2018 MAY 3 AM 10:38

UNITED STATES DISTRICT COURT

for the
District of New Jersey



DANILO C. SILVA

Plaintiff

v.

CITY OF PLAINFIELD

Defendant

Civil Action No. 2:18-CV-08716

NOTICE OF A LAWSUIT AND REQUEST TO WAIVE SERVICE OF A SUMMONS

To: CITY OF PLAINFIELD, C/O CITY CLERK, 515 Watchung Ave, Plainfield, NJ 07060

(Name of the defendant or - if the defendant is a corporation, partnership, or association - an officer or agent authorized to receive service)

Why are you getting this?

A lawsuit has been filed against you, or the entity you represent, in this court under the number shown above. A copy of the complaint is attached.

This is not a summons, or an official notice from the court. It is a request that, to avoid expenses, you waive formal service of a summons by signing and returning the enclosed waiver. To avoid these expenses, you must return the signed waiver within 35 days (give at least 30 days, or at least 60 days if the defendant is outside any judicial district of the United States) from the date shown below, which is the date this notice was sent. Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope or other prepaid means for returning one copy. You may keep the other copy.

What happens next?

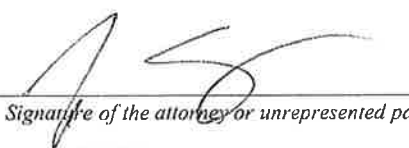
If you return the signed waiver, I will file it with the court. The action will then proceed as if you had been served on the date the waiver is filed, but no summons will be served on you and you will have 60 days from the date this notice is sent (see the date below) to answer the complaint (or 90 days if this notice is sent to you outside any judicial district of the United States).

If you do not return the signed waiver within the time indicated, I will arrange to have the summons and complaint served on you. And I will ask the court to require you, or the entity you represent, to pay the expenses of making service.

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below.

Date: 05/02/2018


Signature of the attorney or unrepresented party

JOHN H. SANDERS, II, ESQ.

Printed name

655 SHREWSBURY AVENUE, SUITE 314
SHREWSBURY, NEW JERSEY 07702

Address

jsanders@shebell.com

E-mail address

(732) 663-1122

Telephone number

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

DANILO SILVA

(b) County of Residence of First Listed Plaintiff UNION

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
(732) 663-1122 JOHN H. SANDERS, II, ESC, SHEBEL & SHEBEL;
655 SHREWSBURY AVENUE, STE. 314, SHREWSBURY, NJ 077702

DEFENDANTS P.O. THOMAS WILLIAMS; PLAINFIELD POLICE
DEPARTMENT; CITY OF PLAINFIELD; PUBLIC SAFETY
DIRECTOR, CARL RILEY; COUNTY OF UNION

County of Residence of First Listed Defendant UNION

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|--|----------------------------|---------------------------------------|
| Citizen of This State | ☒ 1 | ☐ 1 | Incorporated <i>or</i> Principal Place of Business In This State | ☐ 4 | ☒ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated <i>and</i> Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice	PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education	PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. § 1983, et seq.

Brief description of cause:

violation of civil rights; plaintiff was brutally assaulted by a police officer while being held in holding cell**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

1,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

05/02/2018

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING TFP

JUDGE

MAG. JUDGE

SHEBELL & SHEBELL, LLC
John H. Sanders, II, Esq. (Bar ID# 036932001)
655 Shrewsbury Avenue, Suite 314
Shrewsbury, New Jersey 07702
(T) (732) 663-1122 (F) (732) 663-1144
Attorneys for Plaintiff(s)
Our File No.: 49533 (JHS*cgt)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DANILO SILVA

Plaintiff ,

v.

POLICE OFFICER THOMAS
WILLIAMS, CITY OF PLAINFIELD
POLICE DEPARTMENT, PUBLIC
SAFETY DIRECTOR CARL RILEY,
CITY OF PLAINFIELD, COUNTY OF
UNION, JOHN/JANE DOE POLICE
OFFICER(S), 1-25, fictitious
Defendant(s),

Defendants.

Civil Case No.

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiff, Danilo Silva, by way of Complaint against each of the above-named

Defendants, says:

JURISDICTION

1. This action is brought by Plaintiff, Danilo Silva, pursuant to 42 U.S.C. § 1983, the Fourth, Fifth, Eighth and Fourteenth Amendments of the United States Constitution, and under the laws and Constitution of the State of New Jersey, to redress Plaintiff's rights, privileges, and immunities. Jurisdiction is founded upon 28 U.S.C. § 1131 and 28 U.S.C. § 1341 (3) and (4). This Court has supplemental jurisdiction of the state law claims, pursuant to 28 U.S.C. §1367(a).

VENUE

2. Venue is proper, pursuant to 28 U.S.C. §1391(b), in that all parties reside in the District of New Jersey.

THE PARTIES

3. Plaintiff, Danilo Silva, (hereinafter “Silva” or “Plaintiff”), is a thirty-seven-year-old, male, a citizen of the State of New Jersey, and is currently incarcerated at the Garden State Youth Correctional Facility, in Crosswicks, New Jersey.

4. Defendant, City of Plainfield, or collectively with the other named Defendants as “Defendant”), acting through its Public Safety Director and other government employees, is a municipal corporation recognized under appropriate statutes of the State of New Jersey as a government-authorized municipality, pursuant to Title 40A, and is a policymaker for the Plainfield Police Department.

5. Defendant, City of Plainfield Police Department, is a municipal police department, responsible for law enforcement within the City of Plainfield, and was a policy maker regarding certain police procedures, responsible for certain actions alleged herein.

6. Defendant, Carl Riley, was the City of Plainfield Public Safety Director, at the time of the assault that is complained herein. Public Safety Director, Carl Riley is pleaded herein as an individual and in his official capacity under color of State law as the Public Safety Director and as a policy maker for the City of Plainfield Police Department.

7. Defendant, Police Officers, Thomas Williams and/or John/Jane Doe(s), fictitious Police Officer(s), (hereinafter “Defendant Police Officers”), with the City of Plainfield Police Department, ” at the time assaulted Plaintiff, Danilo Silva, and otherwise violated Plaintiff’s rights as alleged herein.

8. Defendants, John and Jane Does (1-25) were the Director(s) of Public Safety, supervisory officers, and/or policy makers for City of Plainfield and the City of Plainfield Police Department who participated in and condoned or ratified the illegal actions complained of in the within Complaint. Those fictitiously-named Defendants are hereby sued in their individual capacities and under color of State law for the unlawful and unconstitutional actions complained of herein.

9. All individual Defendants are past or present employees or supervisory employees or agents of the Defendants or their various subdivisions who acted individually and under color of State law regarding regulations, statutes, policies, customs and usages, actions, inactions and practices of Defendants which resulted in the harm alleged herein.

10. This action has been commenced within two years of the date of Mr. Silva’s assault and wounds inflicted by Defendant, Police Officers.

11. Notices of Tort Claim in the form and content required by N.J.S.A. 59:8-4 were served on the Defendants within the time period prescribed by law.

12. More than six months have elapsed following service on the Defendants with Plaintiff’s Notices of Tort Claim and Plaintiff’s claim remains unsatisfied.

13. The actions of the Defendants were shocking, reckless and willfully indifferent, to the constitutional rights of Plaintiff, Danilo Silva.

FACTUAL AND GENERAL ALLEGATIONS

14. On May 5, 2016 and at all times referenced herein, Plaintiff, Danilo Silva, was being held in the holding cell located within the City of Plainfield's Police Department, when he was brutally assaulted without justification and departed from applicable standard of care, thereby causing him to be seriously injured.

15. During the course of arresting and restraining plaintiff, the Police Officer, Thomas Williams, and others, without lawful justification, negligently, recklessly, intentionally and willfully and wantonly, brutally assaulted in the head and face, causing severe lacerations and scarring to his mouth, lip, jaw and teeth, as well as injuries to his back.

16. As a result of the wounds inflicted by Defendant, Police Officer, Thomas Williams and others acts of abuse, Plaintiff, Danilo Silva, sustained severe, permanent physical injuries, pain and suffering, emotional distress, physical impairment, disability, and loss of enjoyment of life, outstanding medical expenses and loss of earning capacity, and such additional injuries and damages as will be shown at the time of trial.

17. The assault, under the circumstances presented, constituted an unreasonable, unwarranted, and excessive use of force which manifested an unreasonable risk of harm to Plaintiff and others, in violation of the Fourth Amendment to the U.S. Constitution.

18. As a result of the aforementioned conduct by Defendants, Plaintiff sustained severe, painful, permanent and disabling injuries, necessitating medical attention, and sustained severe, mental and emotional distress.

COUNT I
VIOLATIONS OF 42 U.S.C. § 1983

19. Plaintiff repeats each and every allegation contained in the above paragraphs as if more fully set forth at length herein.

20. In May 2016, there were, in effect, certain regulations, guidelines, and policies with respect to the authorized “Use-of-Force” promulgated by the State of New Jersey, Attorney General’s Office, which Plaintiff alleges were abused by Defendant, Thomas Williams, and John/Jane Doe(S), 1-25, fictitiously Police Officers, the City of Plainfield Police Department, and the other Defendants named herein.

21. The acts of the Defendants named in this Complaint constitute a violation of Plaintiff’s constitutional rights under the United States Constitution and were committed under color of State law. The acts either shocked the conscience and/or exhibited a willful/deliberate/reckless indifference for the rights of Plaintiff and others.

22. Said Defendants, individually and under color of State law, deprived Plaintiff of his constitutional and civil rights by, among other things:

- a. Depriving Plaintiff of his constitutional right to due process;
- b. Depriving Plaintiff of his constitutional right to equal protection of the laws;
- c. Subjecting Plaintiff to unlawful and excessive use of force.
- d. Failing to properly train subordinates;
- e. Failing to supervise/control subordinates with a history of misbehavior;
- f. Implicitly and/or expressly teaching, encouraging, and condoning a pattern, practice, and policy of excessive force;
- h. Improperly screening, hiring, training, supervising, disciplining, and retaining dangerous police officers;

- i. Improperly investigating, reporting, and attempting to cover-up the unlawful actions of the Defendants.

23. The above acts constitute a violation of the Civil Rights Act, 42 U.S.C. § 1983, for a violation of Plaintiff's civil and constitutional rights under color of State law.

24. As a result of the above-mentioned acts, Plaintiff has and will in the future, sustain severe emotional and physical harm.

COUNT II
FEDERAL CONSTITUTIONAL TORTS USE OF EXCESSIVE
FORCE CONSTITUTES VIOLATION OF FOURTH AND
EIGHTH AMENDMENT RIGHTS

25. Plaintiff, Danilo Silva, repeats each and every allegation contained in the above paragraphs as if set forth at length herein.

26. The illegal and unconstitutional actions of the Defendants, as detailed in previous paragraphs of this Complaint, violated Plaintiff's Fourth Amendment rights to be free from unreasonable seizure and personal harm by a state law enforcement actor, when Police Officers used excessive, force when assaulting plaintiff, subjecting him to cruel and unusual punishment.

27. As a proximate result of the aforementioned acts, Plaintiff has been damaged and suffered severe and permanent physical and emotional injuries, pain and suffering, disability, impairment and loss of the enjoyment of life, along with other damages as allowed by law.

COUNT III
NEW JERSEY STATE CONSTITUTIONAL TORTS

28. Plaintiff, Danilo Silva, repeats each and every allegation contained in the above paragraphs as if set forth at length herein.

29. The New Jersey Constitution provides in Article I, Paragraph I, that all persons have certain unalienable rights of enjoying and defending life and acquiring and protecting liberty and pursuing and obtaining safety and happiness. Additionally, other clauses of the New Jersey Constitution, including Articles I through XI, declared the rights to life, liberty and the pursuit of safety and happiness of every person in the State of New Jersey.

30. The acts and omissions alleged herein above were sufficiently harmful as to evidence a violation of the rights afforded to Plaintiff under the New Jersey Constitution and evidence a deliberate indifference and willful disregard to the State Constitutional rights of Plaintiff.

31. As a direct result of the willful and wanton acts as described above, Plaintiff has suffered severe harm.

COUNT IV
INTENTIONAL AND/OR NEGLIGENT EXCESSIVE USE OF FORCE

32. Plaintiff repeats each and every allegation contained in the above paragraphs as if set forth at length herein.

33. Defendant Police Officers' act of assaulting Plaintiff, Danilo Silva, without sufficient justification, constituted a use of excessive, use of force and was an intentional, negligent, reckless and or willful and wanton misuse of force, that constitutes a tort perpetrated on Plaintiff, Danilo Silva.

34. Defendants, City of Plainfield Police Department, Public Safety Director, Carl Riley, the City of Plainfield, and the County of Union, jointly, individually and severally, in both their individual and official capacities, are liable for the actions of the Defendant, Police Officer, Thomas Williams, and others, both under the doctrine of

respondeat superior and because of the Defendants negligent failure to properly train, hire, supervise, or discipline, Defendant, Thomas Williams and John/Jane Doe(s), 1-25, fictitiously named Police Officer(s), jointly, individually and severally.

35. As a direct result of the above-mentioned acts by each of the Defendants, City of Plainfield Police Department, Public Safety Director, Carl Riley, the City of Plainfield, and the County of Union, jointly, individually and severally, in both their individual and official capacities, in the training, and supervision of the use of force practices, Plaintiff has been damaged and was forced to endure extreme pain, suffering, and emotional distress, and has suffered a deprivation of his rights under the State and Federal Civil Rights laws.

COUNT V
ASSAULT AND BATTERY

36. Plaintiff, Danilo Silva, repeats each and every allegation contained in the above paragraphs as if set forth completely herein.

37. Plaintiff, Danilo Silva, was not engaged in any act that would necessitate, warrant, justify or permit the use of the level of force exercised by Defendants, Thomas Williams and/or John/Jane Doe(s), 1-25, fictitious Police Officer(s), jointly, individually and severally, when they assaulted Plaintiff, while Plaintiff posed no imminent danger of causing death or serious bodily injury to the officers or others when he was unarmed. As a result, Defendant violated the provisions of the New Jersey Tort Claims Act, N.J.S.A. 59:8-7, et seq., as applicable to the common laws governing assault, battery, pain and suffering, and intentional infliction of emotional distress.

38. As a result of the above-mentioned acts, Plaintiff has suffered severe physical and emotional harm.

COUNT VI
NEGLIGENT SCREENING, SUPERVISING, DISCIPLINING
AND RETENTION OF DANGEROUS POLICE OFFICERS

39. Plaintiff, Danilo Silva, repeats each and every allegation contained in the above paragraphs as if set forth more fully herein.

40. Defendants permitted, tolerated, and ratified the unjustified, unreasonable, and illegal assault by Defendant, Thomas Williams and/or John/Jane Doe(s), 1-25, fictitious named Police Officer(s), jointly, individually and severally, in that the:

- a. Defendants failed to properly discipline or prosecute known incidents of wrongful assaults.
- b. Defendants failed to properly investigate the Silva assault and, instead, officially claimed that the incident was justified and proper.
- c. by means of defendants' inaction and a cover-up of this wrongful assault, defendants have attempted to defeat Silva's civil claims for money damages.

41. The Defendants, the City of Plainfield, the City of Plainfield Police Department, its agents, servants, and employees, including but not limited to Defendant, Thomas Williams and/or Police Officers John/Jane Doe(s), fictitiously named, jointly, individually and severally, Public Safety Director, Carl Riley, are liable to Plaintiff for the assault and subsequent acts and omissions, of these wrongful acts and for permitting conditions such as occurred pursuant to a policy, custom, and practice of the City of Plainfield Police Department.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Danilo Silva, prays for judgment against the Defendants, City of Plainfield, Public Safety Director Carl Riley, City of Plainfield Police Department, City of Plainfield, Defendant, Police Officer, Thomas Williams and John/Jane Doe(s), 1-25, fictitious Police Officer(s), jointly, individually and severally, including, but not limited to, the following:

- a. an award of compensatory damages, punitive or treble damages which are permitted by statutes pleaded herein;
- b. an award of reasonable attorney's fees and all costs of court and interest herein;
- c. an award of damages, as allowed under 42 U.S.C. § 1983 and any other statutes permitting same;
- d. an award for attorney's fees allowed under the appropriate statutes, including but not limited to 42 U.S.C. § 1988;
- e. joint and several liability, where appropriate;
- f. judgment for Plaintiff, Danilo Silva, for all damages, both compensatory and punitive, and for attorneys' fees and costs;
- g. any other prospective or past relief, whether equitable or otherwise, that the Court finds just and appropriate under the circumstances; and
- h. an award for all economic damages, medical expenses, and other damages as allowed by State statutes pleaded herein.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury on all issues in the above-entitled cause of action, pursuant to Fed.R.Civ.P. 37.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, John H. Sanders, II, Esq., is hereby designated as trial counsel for Plaintiff, Danilo Silva.

CERTIFICATION PURSUANT TO RULE 4:5-1

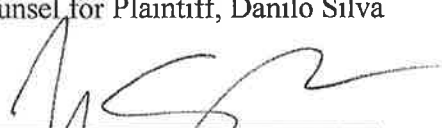
I hereby certify to the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances:

- 1) that the matter in controversy is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;
- 2) the claims, defenses, and other legal contentions therein are warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
- 3) the allegations and other factual contentions have evidentiary support or, if Specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery;
- 4) I further certify that I have no knowledge of any contemplated action or arbitration proceeding which is contemplated regarding the subject matter of this action, other than the aforementioned.

5) that I am not aware of any other parties who should be joined in this action, other than the aforementioned.

SHEBELL & SHEBELL, L.L.C.
Counsel for Plaintiff, Danilo Silva

By:



JOHN H. SANDERS, II, ESQ.
(Bar ID # 036932001)

Dated: May 2, 2018