

PLAINFIELD CITY CLERK'S OFFICE

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Scott A. Parsons +
Paul A. O'Connor, III +*
William R. Lane +
Gregory B. Noble +

R. Daniel Bausé +
Alexandra Loprete +
Robert A. Ballard, III

+ Admitted in NJ & NY
* Admitted in NJ & PA
+ Certified By The Supreme Court of
New Jersey as a Civil Trial Attorney

O'CONNOR, PARSONS, LANE & NOBLE, LLC

ATTORNEYS AT LAW

435 East Broad Street, Westfield, New Jersey 07090

Tel: 908-928-9200 • Fax: 908-928-9232

Tel: 800-586-5817

Gerald B. O'Connor
(1942 - 2015)

of Counsel
Patricia J. Cooney
William V. Lane

December 1, 2017

Via Hand Delivery

City of Plainfield
Plainfield Police Department
200 East 4th Street
Plainfield, New Jersey 07060

Re: Kenneth Reid v. City of Plainfield, et al.
Docket No. UNN-L-003967-17

Dear Sir/Madam:

In connection with the above-captioned matter, and in accordance with the Rules and practices of our Court, we enclose herewith a copy of Summons, together with a copy of the Amended Complaint filed in this case on November 10, 2017 with the Deputy Clerk of the Superior Court, Union County, Law Division, for you to answer within thirty-five (35) days in accordance with the Summons. A copy of the Track Assignment Notice is attached to the Complaint.

Demand is hereby made upon you to answer interrogatories and document requests.

Very truly yours,



ROBERT A. BALLARD, III

RAB:cp
Enclosure

O'CONNOR, PARSONS, LANE & NOBLE, LLC

Gregory B. Noble, Esq. (#017601998)

R. Daniel Bause, Esq. (#019122011)

Robert A. Ballard, III, Esq. (#087192014)

435 East Broad Street

Westfield, New Jersey 07090

Phone: 908-928-9200

Attorneys for Plaintiff

KENNETH REID,

Plaintiff,

v.

CITY OF PLAINFIELD; PLAINFIELD
POLICE DEPARTMENT; ADRIAN
MAPP; CARL RILEY; JANE DOE I-V
(these names being fictitious as their
present identities are unknown); JOHN
DOE I-V (these names being fictitious as
their present identities are unknown);
XYZ CORPORATION I-V (these names
being fictitious as their present identities
are unknown),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY
DOCKET NO: UNN-L-003967-17

Civil Action

SUMMONS

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

**CITY OF PLAINFIELD
PLAINFIELD POLICE DEPARTMENT
200 East 4th Street
Plainfield, New Jersey 07060**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to the 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 available in the Civil Division Management Office in the county listed above and 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, 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 \$135 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 (1-888-576-5529). 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 available in the Civil Division Management Office in the county listed above and online at <http://www.judiciary.state.nj.us/prose/10153deptyclerklawref.pdf>.

/s/ Michelle M. Smith

MICHELLE M. SMITH
Acting Clerk of the Superior Court

DATED: December 1, 2017

Name and address of Defendant to be served:

**CITY OF PLAINFIELD
PLAINFIELD POLICE DEPARTMENT
200 East 4th Street
Plainfield, New Jersey 07060**

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O'CONNOR, PARSONS, LANE & NOBLE, LLC

Gregory B. Noble, Esq. (#017601998)

R. Daniel Bause, Esq. (#019122011)

Robert A. Ballard, III, Esq. (#087192014)

435 East Broad Street

Westfield, New Jersey 07090

Phone: 908-928-9200

Attorneys for Plaintiff

KENNETH REID,

Plaintiff,

v.

**CITY OF PLAINFIELD; PLAINFIELD
POLICE DEPARTMENT; ADRIAN
MAPP; CARL RILEY; JANE DOE I-V
(these names being fictitious as their
present identities are unknown); JOHN
DOE I-V (these names being fictitious as
their present identities are unknown);
XYZ CORPORATION I-V (these names
being fictitious as their present identities
are unknown),**

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY
DOCKET NO:**

Civil Action

**AMENDED COMPLAINT
AND JURY DEMAND**

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

1. Plaintiff Kenneth Reid, ("plaintiff") resides at 518 Wheeler Place, Somerset, NJ 08873, and at all times relevant hereto was employed by defendants.
2. Defendants City of Plainfield (or the "Plainfield Police Department," "Plainfield PD" or "PPD"), is a business with the principal business address of 200 E. 4th Street, Plainfield, NJ 07060, which had the plaintiff in its employ during the relevant time periods herein.

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3. Defendant, Adrian Mapp ("Mapp") is employed at 515 Watchung Avenue, Plainfield, NJ 07060, and at all times relevant hereto was employed by defendant City of Plainfield, and played a role in forcing Plaintiff into retirement.

4. Defendant, Carl Riley ("Riley") is employed at 200 E. 4th Street, Plainfield, New Jersey 07060, and at all times relevant hereto was employed by defendant PPD and had supervisory authority over plaintiff.

5. At all times relevant hereto, the defendants Jane Doe I-V and John Doe I-V are fictitious names used to identify those individuals which names are presently unknown that engaged in wrongful acts outlined herein and their identities are presently unknown.

6. At all times relevant hereto, the defendants XYZ Corporation I-V are fictitious names used to identify those corporations which names are presently unknown but include corporations incorporated under the laws of the State of New Jersey and/or other states and had plaintiff under their employ.

7. Plaintiff is a 59 year old African-American male.

8. Plaintiff commenced employment with the City of Plainfield Police Department in or about July of 1984.

9. From 1984 to 2013, Plaintiff worked his way through the ranks, eventually being promoted to the position of Lieutenant in or about 2013.

10. Upon information and belief, his employment during that time was without incident and his reviews were positive.

11. In or around early 2014, Riley was appointed Police Director and Director of Public Safety, making him Plaintiff's supervisor. Riley is younger than Plaintiff.

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12. In or around fall 2015, Plaintiff was on duty when an intoxicated driver struck a telephone pole in Plainfield.

13. Plaintiff responded to the scene, at which point other officers in the department and the fire division were already on scene. As the Watch Commander, he was advised of what had taken place and was told that other officers were going to check the driver's listed address and confirm his identity.

14. Plaintiff's subordinates dealt with a Union County Assistant Prosecutor in making an application to take a blood sample.

15. Plaintiff and/or his subordinates had difficulty obtaining the identification of the driver, and Plaintiff was subsequently reprimanded for not conveying that information to the Assistant Prosecutor. Plaintiff was threatened with a six month suspension and a demotion.

16. In or around January or February of 2016, Plaintiff was hospitalized with blood pressure issues for about five to six days.

17. During Plaintiff's stay in the hospital, Riley and Sgt. Gene Golston ("Golston") visited him and pushed for his retirement, telling him "you should retire." Riley also told Plaintiff that "this could all go away," asked him how much he makes in side jobs and told him he could make up that extra money with another job.

18. After Plaintiff was released from the hospital, the community began showing support for him, and a rally was organized.

19. Plaintiff's son, a Franklin Township Police Officer, participated in the rally.

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20. Shortly after the rally, Plaintiff was in his driveway when an unmarked Franklin Township Police car approached him. The officer driving the vehicle told Plaintiff that Plainfield Police Department was encouraging Franklin Township to suspend Plaintiff's son for speaking at his rally.

21. Plainfield PD had contacted Franklin Township PD to open an investigation on Plaintiff's son, but Franklin Township PD subsequently found that he had done nothing wrong in speaking out about his father.

22. As the pressure began mounting against Plaintiff, he was forced to retire on May 1, 2016.

23. Upon information and belief, Plaintiff was replaced by, or his job responsibilities subsumed by, a younger employee.

24. In or around June of 2017, Plainfield Fire Chief Frank Tidwell ("Tidwell") filed a lawsuit against the City of Plainfield and Riley, amongst others, alleging harassment and age discrimination. Specifically, Tidwell claims that Riley attempted to force him into retirement due to his age.

25. In his suit, Tidwell claims to have obtained an audio recording in which Riley makes reference to discriminating against Plaintiff.

26. Specifically, the suit claims that Riley allegedly boasted, "Chief Tidwell thinks he's Teflon. You saw what I did to Kenny Reid."

27. Such actions evidence a clear intent on behalf of Riley and the department to discriminate against Plaintiff on account of his age and/or disability/perceived disability and force him to retire.

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FIRST COUNT

**New Jersey Law Against Discrimination
Age Discrimination**

28. Plaintiff repeats and re-alleges each and every allegation of the within paragraphs of this complaint as if set forth at length herein.

29. Plaintiff Reid was a member of a protected class under the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. ("LAD"), because he was 58 at the time of his forced retirement.

30. Defendant City of Plainfield is an "employer" as defined under the LAD.

31. Plaintiff was forced to retire on account of his age in violation of the LAD.

32. This forced retirement constitutes a termination under the LAD.

WHEREFORE, Plaintiff, Kenneth Reid, demands judgment against defendants, City of Plainfield; Plainfield Police Department; Carl Riley; Jane Doe I-V (these names being fictitious as their present identities are unknown); John Doe I-V (these names being fictitious as their present identities are unknown); XYZ Corporation I-V (these names being fictitious as their present identities are unknown), jointly and severally, for harm suffered as a result of defendants' age discrimination in violation of the LAD as follows:

- (a) full compensation for back pay and benefits with full remuneration, with interest;
- (b) full compensation for front pay and benefits with full remuneration, with interest;
- (c) compensatory damages;
- (d) consequential damages;

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- (e) punitive damages;
- (f) pre-judgment interest;
- (g) attorneys' fees with appropriate enhancement under Rendine v.

Pantzer, 141 N.J. 292 (1995); and

(h) such other relief as may be available pursuant to the LAD in which this court deems to be just and equitable.

SECOND COUNT

New Jersey Law Against Discrimination Hostile Work Environment – Disability and/or Perceived Disability Harassment and Discrimination

33. Plaintiff repeats and realleges each and every allegation of the within paragraphs of this Complaint as if set forth at length herein.

34. Pursuant to the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. ("LAD"), defendant is liable for the acts constituting hostile work environment disability and/or perceived disability harassment and discrimination of Plaintiff by defendants' employees, supervisors and management.

35. Defendants are an "employer" as defined under the LAD.

36. As set forth herein, defendants created and perpetuated a severe and pervasive hostile work environment based upon harassing Plaintiff at the hospital during his medical leave. Plaintiff was harassed and intimidated during his medical leave, and was forced into retirement.

37. Plaintiff was forced to retire on account of his disability in violation of the LAD.

38. Plaintiff was forced to retire on account of a perception by his employer

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that he was disabled in violation of the LAD. This forced retirement constitutes a termination under the LAD.

39. Defendants failed to implement any effective preventative or remedial measures to protect against disability and/or perceived disability discrimination including, but not limited to:

- (a) failure to adequately train supervisory personnel;
- (b) failure to institute or implement effective policies or procedures regarding racial and other discrimination and the reporting and investigation of complaints of same;
- (c) failure to adequately monitor or supervise the illegal activities and discriminatory actions of supervisory personnel;
- (d) failure to provide adequate training to recognize, address, rectify and/or prevent illegal or discriminatory conduct; and
- (e) failure to adequately rectify, discipline or prevent known discriminatory conduct by supervisory personnel.

40. The conduct engaged in by defendants constitutes egregious behavior and/or willful indifference by upper management to the rights of Plaintiff sufficient to subject defendants to punitive damages under the LAD and Lehmann v. Toys 'R' Us.

41. Plaintiff has been severely injured as a result of such disability and/or perceived disability discrimination that he has suffered, and continues to suffer, physical and bodily injuries, severe emotional distress, humiliation, embarrassment, anguish, person hardship, career and social disruption, psychological and emotional harm, economic losses, lost employment opportunities, and other such damages.

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WHEREFORE, Plaintiff, Kenneth Reid, demands judgment against defendants, City of Plainfield; Plainfield Police Department; Carl Riley; Jane Doe I-V (these names being fictitious as their present identities are unknown); John Doe I-V (these names being fictitious as their present identities are unknown); XYZ Corporation I-V (these names being fictitious as their present identities are unknown), jointly and severally, for harm suffered as a result of defendants' hostile work environment disability and/or perceived disability discrimination in violation of the LAD as follows:

- (a) full compensation for back pay and benefits with full remuneration, with interest;
- (b) full compensation for front pay and benefits with full remuneration, with interest;
- (c) compensatory damages;
- (d) consequential damages;
- (e) punitive damages;
- (f) pre-judgment interest;
- (g) attorneys' fees with appropriate enhancement under Rendline v. Pantzer, 141 N.J. 292 (1995); and
- (h) such other relief as may be available pursuant to the LAD in which this court deems to be just and equitable.

O'CONNOR, PARSONS, LANE & NOBLE, LLC
Attorneys for Plaintiff

By: _____

GREGORY B. NOBLE

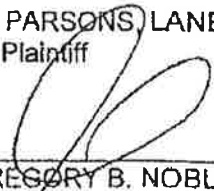
Dated: November 2, 2017

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JURY DEMAND

Plaintiffs demand a trial by jury as to all issues.

O'CONNOR, PARSONS, LANE & NOBLE, LLC
Attorneys for Plaintiff

By: 

GREGORY B. NOBLE

Dated: November 2, 2017

DESIGNATION OF TRIAL COUNSEL

Please take notice that pursuant to Rule 4:25-4, Gregory B. Noble, Esq. is hereby designated as trial counsel in the within matter.

CERTIFICATION PURSUANT TO RULE 4:5-1

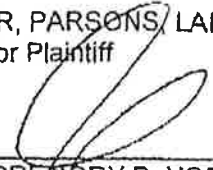
The undersigned, Gregory B. Noble, certifies on behalf of the plaintiff as follows:

1. I am an attorney admitted to practice law in the State of New Jersey, counsel for the above-named Plaintiff in the subject action.
2. The matter in controversy in this case is not, to my knowledge, the subject of any other action pending in any court or pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.
3. There are no other parties who should be joined in this action that we are aware of at the present time.

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I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

O'CONNOR, PARSONS, LANE & NOBLE, LLC
Attorneys for Plaintiff

By: 

GREGORY B. NOBLE

Dated: November 2, 2017

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UNION COUNTY SUPERIOR COURT
2 BROAD STREET
ELIZABETH NJ 07207

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (908) 659-4810
COURT HOURS 8:30 AM - 4:30 PM

DATE: NOVEMBER 07, 2017
RE: REID KENNETH VS CITY OF PLAINFIELD
DOCKET: UNN L -003967 17

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 J. MEGA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (908) 659-4820.

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: GREGORY B. NOBLE
O'CONNOR PARSONS LANE & NOBLE
435 EAST BROAD ST
WESTFIELD NJ 07090-2123

ECOURTS

O'CONNOR, PARSONS, LANE & NOBLE, LLC

Gregory B. Noble, Esq. (#017601998)

R. Daniel Bause, Esq. (#019122011)

Robert A. Ballard, III, Esq. (#087192014)

435 East Broad Street

Westfield, New Jersey 07090

Phone: 908-928-9200

Attorneys for Plaintiff

KENNETH REID,

Plaintiff,

v.

CITY OF PLAINFIELD; PLAINFIELD
POLICE DEPARTMENT; ADRIAN
MAPP; CARL RILEY; JANE DOE I-V
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XYZ CORPORATION I-V (these names
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Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY
DOCKET NO: UNN-L-003967-17

Civil Action

PLAINTIFF'S FIRST DEMAND TO
DEFENDANT TO ANSWER
INTERROGATORIES

To: **COUNSEL FOR DEFENDANT CITY OF PLAINFIELD; PLAINFIELD
POLICE DEPARTMENT**

COUNSEL:

PLEASE TAKE NOTICE that plaintiffs require of defendant answers under oath or
certification to the following interrogatories within the time prescribed by law.

INSTRUCTIONS

In responding to these interrogatories, furnish all information available to defendant, including information in the possession of defendant's attorneys, investigators, and all other persons acting on defendants' behalf, and not merely such information that is within defendants' personal knowledge.

Defendant and defendant's attorneys are required to supplement promptly the answers to these interrogatories as new information comes to their attention.

As used herein, the term "person" means natural persons, corporations, partnerships, sole proprietorships, unions, associations, or any other kind of entity.

As used herein, a "document" means any handwritten, printed, typewritten, recorded, electro-magnetic, graphic or photographic matter, however produced or reproduced, including, but not limited to: contracts; agreements; correspondence; telegrams; teletype; memoranda; drafts; records; reports; computer printouts and/or records; communications; notes; stenographic or handwritten notices; analyses; work papers; notices; orders; bill or invoices; announcements; instruments; minutes; transcripts of conversations or meetings; summaries; agenda; calendars; diaries; files; maps; drawings; graphs; charts; blue-prints; journals; books of account; ledgers; checks; receipts; books; studies; manuals; brochures; pamphlets; bulletins; schedules; periodicals; newspapers; price lists; photographs; tape recordings; and any other writings. "Documents" refers to the original; or identical copy where the original is unavailable; and any non-identical copy (where it differs from the original in any respect because of alterations, notes comments, attachments, or otherwise).

"Communication" means any contact, whether in person, in writing, by

telephone, or any other method whereby knowledge, facts or information is transmitted from one person or entity to another, or to a file.

In each interrogatory wherein defendant is asked to "identify" a person, state (i) his or her full name; (ii) present or last known home address; (iii) present or last known position and business affiliation; and (iv) position, business affiliation, and job description at the time relevant to the Interrogatory involved.

In each interrogatory wherein defendant is asked to "identify" and/or "describe" any document, state (i) the date; (ii) author or preparer; (iii) addressee(s) or recipient(s); (iv) the type of document (e.g., letter) or some other means of describing it; (v) a summary of its contents with reasonable particularity sufficient for a specific demand for production; (vi) the present address where it is kept, if known, and if not known, the last address known and information as to its disposition, and the names and address of the person who has possession or control. Documents to be identified shall include both documents in your possession, custody and control and all other documents of which you have knowledge.

For the purpose of these interrogatories, unless otherwise specified, the period for which answers are requested is January 1, 2012 to the present.

"Relating to" shall be construed in the broadest sense to require information which pertains to, evidences, contains, reflects, discloses, describes, explains, summarizes, concerns or refers to, whether directly or indirectly, the subject of the Interrogatory.

The term "person" shall mean the plural as well as the singular and includes any legal entity, including natural person acting as individuals or in a collegial capacity

(e.g., a committee or board of directors), firms, proprietorships, corporations, businesses or any other form of public or private organization or entity.

"Plaintiff" shall mean KENNETH REID.

"Defendant(s)", "You" and/or "your" shall mean CITY OF PLAINFIELD; PLAINFIELD POLICE DEPARTMENT; ADRIAN MAPP; CARL RILEY; JANE DOE I-V (these names being fictitious as their present identities are unknown); JOHN DOE I-V (these names being fictitious as their present identities are unknown); XYZ CORPORATION I-V (these names being fictitious as their present identities are unknown).

If defendant claims a privilege with regard to any information or document requested herein, state the nature of the privilege claimed and provide the specific factual basis for asserting the privilege as to the particular information or document at issue.

O'CONNOR, PARSONS, LANE & NOBLE, LLC
Attorneys for Plaintiff

By: 
ROBERT A. BALLARD, III

Dated: November 30, 2017

INTERROGATORIES

1. State the name, last known address, and last known telephone number of all persons who have knowledge of facts relating in any way to this matter, and specify the subject matter of each such person's knowledge.

2. List chronologically each job title held by plaintiff while employed by defendant, indicating the time period during which each position was held.

3. For any position held by plaintiff while employed by defendant for which there is no job description, describe with specificity the job functions of each such position.

4. State the required qualifications and skills for each and every job title that plaintiff held while employed by defendant.

5. State whether plaintiff was ever promoted while employed by defendant. For each promotion, state the following:

a. from what position or job title plaintiff was promoted and to what position or job title plaintiff was promoted;

b. the date of the promotion;

c. the reason(s) for the promotion;

d. the names, last known addresses, last known telephone numbers, and job titles, of all persons involved in the decision-making process and the nature and extent of their involvement in the decision;

e. the criteria used in making the decision; and

f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

6. State whether plaintiff was ever demoted while employed by defendant. For each demotion, state the following:

- a. from what position or job title plaintiff was demoted and to what position or job title plaintiff was demoted;
- b. the date of the demotion;
- c. the reason(s) for the demotion;
- d. the names, last known addresses, last known telephone numbers, and job titles, of all persons involved in the decision-making process and the nature and extent of their involvement in the decision;
- e. the criteria used in making the decision; and
- f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory

7. Specify the form and substance of any and all compensation that defendant provided to plaintiff (including but not limited to salary, wages, bonuses, commissions, employee benefits, and retirement benefits) for each year of plaintiff's employment.

8. Specify the form and substance of any and all compensation that defendant provided to employees, other than plaintiff, with similar job titles or job descriptions (including but not limited to salary, wages, bonuses, commissions, employee benefits, and retirement benefits) for each year in which plaintiff was employed.

9. (a) Set forth in full and complete detail and without reference to any pleading all admissions or statements against interest which you contend that any party to this litigation has made in connection with the subject matter of this litigation, including:

(i) The identity of the person making same;

(ii) The precise date thereof;

(iii) The full substance thereof;

(b) Identify all persons with knowledge of the facts set forth in the answer to this Interrogatory and set forth the general substance of each person's knowledge and;

(c) Identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

10. Set forth the complete factual basis for each and every defense asserted by defendant.

11. Set forth the complete factual basis for each and every counterclaim asserted by defendant.

12. If defendant contends that any damages were suffered as a result of the allegations that form the basis of the counterclaims, set forth with particularity the nature and amount of each element of those damages, as well as each and every fact in support of those damages.

13. Identify each individual who has had authority to control plaintiff's work environment at any time from January 1, 2012 to the present.

14. State whether any internal complaints were received by defendants from plaintiff reflecting, referring or relating to unlawful discrimination based on age, disability and/or perceived disability, harassment based on disability or perceived disability, or unlawful retaliation. If so, state the following:

- a. Describe in detail all such complaints, the date received and by whom, identify all persons involved in making, processing and/or resolving same, and the disposition thereof.
- b. Identify all persons with knowledge of the facts set forth in the answer to this Interrogatory and set forth the general substance of each person's knowledge; and
- c. Identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

15. State whether defendants investigated plaintiff's claims at any point prior to this litigation. If so, provide the following:

- a) the name, last known address, last known telephone number, and job title, of each individual who conducted or participated in the investigation;
- b) all findings or conclusions of the investigation;
- c) the time period during which the investigation occurred;
- d) a description of all actions taken as a result of the investigation; and
- e) identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory

16. State whether any person other than plaintiff has ever accused defendants of unlawful discrimination based on age, disability and/or perceived disability, harassment based on disability or perceived disability, or unlawful retaliation. If so, state the following:

- a. the name, last known address, last known telephone number, and disability of each such complainant;
- b. the name, address, and telephone number of the employer for whom the complainant was working when the alleged incident occurred;
- c. the date of each such complaint;
- d. the nature and substance of each such complaint;
- e. the name, last known address, last known telephone number, and job title to whom the complaint was made; and
- f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

17. State whether any civil or criminal action has ever been filed in any court charging defendants with unlawful discrimination based on age, disability and/or perceived disability, harassment based on disability or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD). If so, provide the following for each such action:

- a) the name, last known address, last known telephone number, and job title of the complainant(s);
- b) the title of the action;
- c) the name and address of the court where the action was filed;
- d) the docket number of the action;
- e) the date on which the action was filed;
- f) the nature and substance of the action;
- g) the disposition or present status of the action;
- h) whether the case was tried and, if so, the verdict;
- i) the amount of punitive damages, if any;
- j) the amount of compensatory damages, if any; and
- k) identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

18. State whether defendants maintain a system or procedure for recording, investigating, and/or resolving employee complaints of unlawful discrimination based on age, disability and/or perceived disability, harassment based on disability or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD). If so:

- a. provide a description of the system(s) or procedure(s) used since January 1, 2012; and
- b. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

19. State whether at any time from January 1, 2012 to the present, defendants had any policy procedure, training program, and/or manual or handbook referring, reflecting and/or relating to unlawful discrimination based on age, disability and/or perceived disability, failure to accommodate, workers' compensation retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD).

- (a) If so, set forth in detail the substance of each such policy, procedure, training program, manual and/or handbook, the dates when any or all were promulgated and in effect, and whether any were oral or in writing. If oral, set forth the full substance thereof; if written, attach copies hereto.
- (b) Identify all persons involved in promulgating, monitoring and/or supervising same.
- (c) If you contend that any such policies, programs and/or procedures were followed in the case of any plaintiff, set forth the full reasons for such contention and identify all persons involved.
- (d) If said policies, programs and/or procedures were not followed in the case of any plaintiff, set forth the full reasons therefore and identify all persons involved.
- (e) Identify all persons with knowledge of the facts set forth in the answer to this Interrogatory and set forth the general substance of each person's knowledge.
- (f) Identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

20. Identify all members of defendant's litigation control group and, as to each member, state:

- (a) the individual's full name;
- (b) job title; and
- (c) whether the member is a current or former agent or employee of defendants.

21. State whether defendant has insurance that may cover any recovery by plaintiff or defense against plaintiff's claims, and if so, specify the name of the insurance carrier and the nature and amount of coverage.

22. State the names and addresses of any and all proposed expert witnesses whom defendant has retained for this matter.

22. With respect to each proposed expert witness referred to in the preceding interrogatory, provide the following:

- (a) field of expertise;
- (b) educational background;
- (c) the names of any and all books, periodicals, or other writings that he or she has written or to which he or she has contributed;
- (d) the date, time, and place at which any oral opinion was rendered, specifying to whom that opinion was rendered and describing the content of that opinion;
- (e) true and accurate copies of any and all written reports or opinions, including drafts;
- (f) the name, last known address, last known telephone number, job title, and current employer of each person with whom the expert has met in connection with formulating his or her opinion or preparing his or her report(s); and
- (g) true and accurate copies of any and all documents that the expert created, obtained, or reviewed in connection with the formulation of his or her opinion or the preparation of his or her report(s).

23. State whether defendant and/or defendant's agents have any written statements from any potential witness in this matter.

24. State whether defendant and/or defendant's agents communicated with any persons or entities that are not parties to this litigation in connection with the subject matter of this lawsuit. For all such communications that were oral, specify the nature and substance of the communication, the date on which it occurred, the place at which it occurred, and the names, last known addresses, and last known telephone numbers of all persons present. For all such communications that were written, provide true and accurate copies of each such communication.

25. Specify the gross income or revenue and net worth of defendant for each year from 2012 to the present.

26. If defendant claims that any document requested in any of plaintiff's interrogatories or document requests is protected from discovery by an evidentiary privilege, specify the title of the document, the date on which it was created and/or distributed, its author(s), its recipient(s), its purpose(s), the circumstances under which it was created and/or distributed, and the basis for the claim of privilege.

27. Set forth whether you either destroyed or disposed of any documents that in any way touch upon, discuss or pertain to any matters relating to this suit.

If "yes," (i) identify each document; (ii) state when it was destroyed or disposed of; and (iii) identify the person who authorized or ordered the destruction.

28. Identify the person or persons answering each of these Interrogatories. State whether the facts set forth in the answers are based on personal knowledge. If not based on personal knowledge, set forth the sources of information and belief.

29. Identify each person who assisted or participated in preparing and/or supplying any of the information given in answer to or relied in answering these Interrogatories.

30. Indicate whether the individual certifying these interrogatory answers had the opportunity to review the typed responses.

31. Identify any and all individuals hired, transferred and/or promoted by defendants, including those hired, transferred and/or promoted to replace plaintiff and/or perform his/her job functions, from the time defendant demoted plaintiff to the present time, including the position for which they were hired, their age, their gender and their race.

32. Identify any and all persons who made the decision, were consulted about and/or were involved in any way in the decision to discipline plaintiff. As to each such person, describe the role he/she played in the decision to discipline plaintiff, identify the dates on which such person engaged in any meeting or conversation regarding the decision to discipline of plaintiff, identify the persons with whom such meetings or conversations occurred, and describe the content of such meetings or conversations.

CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

I certify that all copies of documents submitted in response to these interrogatories are true and accurate copies of the original documents.

I certify that in responding to the foregoing interrogatories, I have furnished all information and all documents available to me and my agents and attorneys.

Dated:

O'CONNOR, PARSONS, LANE & NOBLE, LLC

Gregory B. Noble, Esq. (#017601998)

R. Daniel Bause, Esq. (#019122011)

Robert A. Ballard, III, Esq. (#087192014)

435 East Broad Street

Westfield, New Jersey 07090

Phone: 908-928-9200

Attorneys for Plaintiff

KENNETH REID,

Plaintiff,

v.

CITY OF PLAINFIELD; PLAINFIELD
POLICE DEPARTMENT; ADRIAN
MAPP; CARL RILEY; JANE DOE I-V
(these names being fictitious as their
present identities are unknown); JOHN
DOE I-V (these names being fictitious as
their present identities are unknown);
XYZ CORPORATION I-V (these names
being fictitious as their present identities
are unknown),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY
DOCKET NO: UNN-L-003967-17

Civil Action

PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

To: **COUNSEL FOR DEFENDANT CITY OF PLAINFIELD; PLAINFIELD
POLICE DEPARTMENT**

INSTRUCTIONS

"Documents" means, without limitation, any handwritten, printed, typewritten, recorded, Electro-magnetic, graphic or photographic matter, however produced or reproduced, including, but not limited to: contracts; agreements; correspondence; telegrams; teletype; memoranda; e-mails; drafts; records; reports; computer printouts, records and/or disks; communications; notes; stenographic or handwritten notices; analyses; work papers; notices; orders; bill or invoices; announcements; instruments; minutes; transcripts of conversations or meetings, summaries; agenda; calendars; diaries; files; maps; drawings; graphs; charts; blueprints; journals; books of account; ledgers; checks; receipts; books; studies; manuals; brochures; pamphlets; bulletins; schedules; periodicals; newspapers; price lists; photographs; tape recordings; voice mails; and any other writings. "Documents" refers to the original; or identical copy

where the original is unavailable; and any non-identical copy (where it differs from the original in any respect because of alterations, notes comments, attachments, or otherwise).

"Communication" means any contact, whether in person, in writing, by telephone, or any other method whereby knowledge, facts, or information is transmitted from one person or entity to another, or to a file.

"Identify" or "Identity":

(a) When referring to a person, means to state: (i) his or her full name; (ii) present or last known home address; (iii) present or last known position and business affiliation; and (iv) position, business affiliation, and job description at the time relevant to the involved demand.

(b) When referring to a document, means to state: (i) the date; (ii) author or preparer; (iii) addressee(s) or recipients; (iv) the type of document (e.g., letter) or some other means of describing it; (v) a summary of its contents with reasonable particularity sufficient for a specific demand for production; (vi) the present address where it is kept, if known, and if not known, the last address known and information as to its disposition, and the name and address of the person who has possession or control. Documents to be identified shall include both documents in your possession, custody and control and all other documents of which you have knowledge.

(c) When referring to a corporation, means to state its legal name; the name(s) under which it does business; the state or country of incorporation; the date of incorporation; if not a New Jersey corporation, the date authorized to do business in New Jersey; whether it is now in good standing; if not in good standing, how and when dissolved or forfeited; its principal office; the nature of the business in which it is engaged; the name and address of its directors and officers at the times relevant to this case and presently; and its relationship, if any, to any of the parties to this case.

(d) When referring to a partnership, means to state its legal name; the name(s) under which it does business; the state of its formation; the date of formation; if not a New Jersey partnership, the date authorized to do business in the State; whether it is now in good standing, if not in good standing, how and when dissolved or forfeited; the address of its principal office; the nature of the business in which it is engaged; the names and addresses of the partners at all times relevant to this case and presently; and its relationship, if any to any of the parties to this case.

(e) When referring to an oral communication, means to state: (i) when and where it was made; (ii) the identity of each person making the oral communications, each person to whom the oral communication was made, and each other person present; (iii) the means of communication (e.g., face-to-face meeting, telephone); (iv) a precise and complete description of the substance of each communication; and (v) the identity of all documents referred to in the course of the oral communication.

(f) When referring to an expert, means to state: (i) his or her field(s) of expertise; (ii) his or her qualifications, including, without limitation, all formal or specialized training in his or her field(s) of expertise, membership in any professional or trade associations in his or her field(s) of expertise, and his or her professional experience in his or her field(s) of expertise; (iii) the title and full citation of each of his or her published books and articles; and (iv) attach all curriculum vitae of said expert.

"Plaintiff" shall mean KENNETH REID.

"Defendant(s)", "You" , the "School" and/or "your" shall mean CITY OF PLAINFIELD; PLAINFIELD POLICE DEPARTMENT; ADRIAN MAPP; CARL RILEY; JANE DOE I-V (these names being fictitious as their present identities are unknown); JOHN DOE I-V (these names being fictitious as their present identities are unknown); XYZ CORPORATION I-V (these names being fictitious as their present identities are unknown).

"Relating to" shall be construed in the broadest sense to require information which pertains to, evidences, contains, reflects, discloses, describes, explains, summarizes, concerns or refers to, whether directly or indirectly, the subject of the request.

The term "person" shall mean the plural as well as the singular and includes any legal entity, including natural persons acting as individuals or in a collegial capacity (e.g., a committee or board of directors), firms, proprietorships, corporations, businesses or any other form of public or private organization or entity.

For the purposes of this First Request for Production of Documents, unless otherwise specified, the period for which documents are requested is January 1, 2012 through the present.

You shall label each of the documents or group of documents produced in response to this request for production of documents with the number of each paragraph hereof in response to which it is produced.

Each request for documents herein shall be deemed continuing as to require prompt supplemental responses if defendants obtain or discover further documents called for herein between the time of responding to this request and the trial of this action.

Each document shall be produced as kept in the usual course of business and shall be produced with its file folder and in such a fashion to show the identity of the file or location in which such document was located.

O'CONNOR, PARSONS, LANE & NOBLE, LLC
Attorneys for Plaintiff

By: _____



ROBERT A. BALLARD, III

Dated: November 30, 2017

REQUEST FOR DOCUMENTS

The following documents are hereby requested:

1. All documents reflecting, referring or relating to plaintiff.
2. Any and all job descriptions for each position held by plaintiff while employed by defendant.
3. Any and all organizational charts / tables of organization that depict the organization in which plaintiff was employed at any and all times that plaintiff was employed by defendant, including from 1997 to the present.
4. Any and all employment policy manuals, superior officers' association contracts or employment handbooks that were in effect at any and all times during plaintiff's employment by defendant.
5. Any and all files kept by defendant regarding plaintiff, including but not limited to plaintiff's entire personnel file and internal affairs file.
6. Any and all documents relating in any way to any and all personnel actions regarding plaintiff.
7. Any and all evaluations of plaintiff's job performance while employed by defendant, including from 1997 to the present.
8. Any and all documents relating in any way to any and all awards, leadership training or other commendations given to plaintiff while employed by defendant.
9. Any and all attendance records or work schedules regarding plaintiff's employment by defendant.
10. Any and all files kept by defendant regarding any and all persons who were hired or promoted to fill plaintiff's position, including but not limited to each such person's entire personnel file.
11. Any and all evaluations of the job performance of any and all persons who were hired or promoted to fill plaintiff's jobs.
12. Any and all payroll information for employees with similar job titles or job descriptions as plaintiff for the years in which plaintiff was employed.

13. Any and all witness statements relating in any way to this matter.
14. Any and all documents relating in any way to any and all communications between defendant and any other employee of defendant regarding the subject matter of this lawsuit.
15. Any and all insurance policies that may provide coverage for the costs of defense in this matter or for any recovery by plaintiff in this matter.
16. Any and all documents relating in any way to any and all releases from liability that defendant asked plaintiff to sign.
17. Any and all documents relied upon or referred to in preparing defendant's interrogatory answers in this matter.
18. Any and all documents relating in any way to any defense asserted by defendant.
19. Any and all documents relating in any way to each counterclaim asserted by defendant.
20. Any and all documents relating in any way to the damages that defendant allegedly suffered.
21. Any and all audio recordings related in any way to this matter.
22. Any and all video recordings related in any way to this matter.
23. Any and all e-mails received or sent related in any way to this matter, including from both business and personal email accounts.
24. Any and all documents and electronically stored information that you referred to, relied upon, consulted, or used in any way in answering each interrogatory set forth in plaintiff's Interrogatories.
25. Any and all documents not specifically requested that relate in any way to this matter.
26. Any and all documents not specifically requested that defendant may use in any way at any deposition in this matter.

27. Any and all documents not specifically requested that defendant may use in any way at trial.
28. Any and all documents relating in any way to any and all internal complaints of unlawful discrimination based on age, disability and/or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD) made by plaintiff to defendants.
29. Any and all documents relating in any way to any and all investigations of plaintiff's claims conducted by defendants prior to this litigation.
30. Any and all documents relating in any way to any and all accusations of unlawful discrimination based on age, disability and/or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD) made by any person other than plaintiff against defendants.
31. Any and all documents relating in any way to any and all complaints filed with any court, the United States Equal Employment Opportunity Commission, the New Jersey Division on Civil Rights, or any other federal, state or local governmental agency charging defendants with unlawful discrimination based on age, disability and/or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD).
32. Any and all policies regarding unlawful discrimination based on age, unlawful discrimination based on age, disability and/or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD) that were in effect during the time period that plaintiff was employed by defendants.
33. Any and all documents relating in any way to any and all systems or procedures that defendants maintained for reporting, investigating, and resolving employee complaints of unlawful discrimination based on age, disability and/or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD) during the time period that plaintiff was employed by defendants.

34. Any and all documents relating in any way to any and all education or training regarding unlawful discrimination based on age, disability and/or perceived disability, unlawful retaliation and/or any other violation of the New Jersey Law Against Discrimination (LAD) that defendants conducted during the time period that plaintiff was employed by defendants.
35. Any and all documents relating in any way to the decision to threaten plaintiff with disciplinary action in the fall of 2015.
36. Any and all documents or communications regarding any internal affairs investigation involving plaintiff in or around fall 2015.

CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. I certify that all copies of documents submitted in response to these interrogatories are true and accurate copies of the original documents.

I certify that in responding to the foregoing interrogatories, I have furnished all information and all documents available to me and my agents and attorneys.

Dated:

NJ SUPERIOR COURT LAWYER REFERRAL AND LEGAL SERVICE LIST

ATLANTIC COUNTY:

Deputy Clerk, Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., 1st Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

ESSEX COUNTY:

Deputy Clerk, 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

MONMOUTH COUNTY:

Deputy Clerk, Superior Court
Court House
P. O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

SUSSEX COUNTY:

Deputy Clerk, Superior
Court
Sussex County Judicial
Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

BERGEN COUNTY:

Deputy Clerk, Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

GLOUCESTER COUNTY:

Deputy Clerk, Superior Court
Civil Case Management Office,
Attn: Intake, First Fl., Court
House
1 North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

MORRIS COUNTY:

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

UNION COUNTY:

Deputy Clerk, Superior
Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-
6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

BURLINGTON COUNTY:

Deputy Clerk, Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

HUDSON COUNTY:

Deputy Clerk, Superior Court
Civil Records Dept.
Brennan Court House, 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

OCEAN COUNTY:

Deputy Clerk, Superior Court
Court House, Room 121
118 Washington Street
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

WARREN COUNTY:

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

CAMDEN COUNTY:

Deputy Clerk, Superior Court
Civil Processing Office
Hall of Justice
1st Fl, Suite 150
101 South 5th Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

HUNTERDON COUNTY:

Deputy Clerk, Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

PASSAIC COUNTY:

Deputy Clerk, Superior Court
Civil Division - Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

CAPE MAY COUNTY:

Deputy Clerk, Superior Court
9 N. Main Street
Cape May Court House, NJ
08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

MERCER COUNTY:

Deputy Clerk, Superior Court
Local Filing Office, Courthouse
175 S. Broad Street
P. O. Box 8668
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

SALEM COUNTY:

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

CUMBERLAND COUNTY:

Deputy Clerk, 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

MIDDLESEX COUNTY:

Deputy Clerk, 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

SOMERSET COUNTY:

Deputy Clerk, Superior Court
Civil Division Office
40 North Bridge Street
P. O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840