

SUMMONS

Sup.

Attorney(s) Donald F. Burke, Esq.

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Telephone Number (732) 966-4922

Attorney(s) for Plaintiff Valerie Blauvelt

VALERIE BLAUVELT,

Plaintiff(s)

vs.

BOROUGH OF POINT PLEASANT

BEACH, ET AL.,

Defendant(s)

**Superior Court of
New Jersey**

Ocean ☒ County

Law Division

Docket No: OCN-L-2744-19

**CIVIL ACTION
SUMMONS**

Received 3:04pm

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 available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/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 (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.njcourts.gov/forms/10153_deptyclerklawref.pdf.

Michelle M. Smith
Clerk of the Superior Court

DATED: 02/21/2020

Name of Defendant to Be Served: Joseph Michigan

Address of Defendant to Be Served: c/o Boro. of Pt. Beach, 416 New Jersey Ave., Point Pleasant Beach, NJ 08742

DONALD F. BURKE, ESQ. #008011983
LAW OFFICE OF DONALD F. BURKE
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ATTORNEYS FOR PLAINTIFF
VALERIE BLAUVELT

VALERIE BLAUVELT,

Plaintiff,

v.

BOROUGH OF POINT PLEASANT
BEACH, BOROUGH OF POINT PLEASANT
BEACH POLICE DEPARTMENT, JOSEPH
MICHIGAN, EILEEN FARRELL,
CHRISTINE RIEHL (IN THEIR OFFICIAL
AND INDIVIDUAL CAPACITIES),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: OCEAN COUNTY

CIVIL ACTION

DOCKET No.: OCN-L-

COMPLAINT AND JURY DEMAND

Plaintiff VALERIE BLAUVELT, a resident of the Borough of Point Pleasant Beach, County of Ocean, State of New Jersey, through her undersigned attorney DONALD F. BURKE, ESQ., by way of Complaint against defendants, states as follows:

PARTIES

1. Plaintiff VALERIE BLAUVELT is an individual who is a citizen of the State of New Jersey and was an employee of defendant BOROUGH OF POINT PLEASANT BEACH as that term is defined by the New Jersey Law Against Discrimination, *N.J.S.A. 10:5-1 et seq.* (the "NJLAD").
2. Defendant BOROUGH OF POINT PLEASANT BEACH is a municipality in the Coun-

ty of Ocean, State of New Jersey and is a governmental unit which controls the operations and employees of the BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT (the “Department”).

3. The defendant BOROUGH OF POINT PLEASANT BEACH is an employer, as defined in *N.J.S.A.* 10:5-5.

4. Defendant BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT is an agency of a governmental unit.

5. The defendant BOROUGH OF POINT PLEASANT BEACH is a Merit System Jurisdiction pursuant to Title 11A of the New Jersey Statutes – the Civil Service laws.

6. Defendant JOSEPH MICHIGAN is employed by defendant BOROUGH OF POINT PLEASANT BEACH as Police Chief and managed plaintiff VALERIE BLAUVELT’S workplace.

7. At all times relevant to this Complaint, defendant JOSEPH MICHIGAN was an upper level manager who aided and abetted in the harassment, discrimination and retaliation as more fully alleged herein.

8. Defendant EILEEN FARRELL is employed by defendant BOROUGH OF POINT PLEASANT BEACH as Municipal Clerk and was at relevant times the Appointing Authority.

9. At all times relevant to this Complaint, defendant EILEEN FARRELL was an upper level manager who aided and abetted in the harassment, discrimination and retaliation as more fully alleged herein.

10. Defendant CHRISTINE RIEHL is employed by defendant BOROUGH OF POINT PLEASANT BEACH as Borough Administrator.

11. At all times relevant to this Complaint, defendant CHRISTINE RIEHL was an upper level manager who aided and abetted in the harassment, discrimination and retaliation as more fully alleged herein.

12. Defendants JOHN DOES 1-10 are individuals who are employees, agents and/or representatives of defendants engaged in wrongful and retaliatory conduct towards plaintiff whose true identities are unknown but may be revealed through discovery.

13. All defendants are named herein in their official and individual capacities for discriminatory and retaliatory conduct in violation of the New Jersey Law Against Discrimination, the New Jersey Civil Rights Act, and the New Jersey Constitution and laws of the State of New Jersey.

JURISDICTION

14. The court has subject-matter jurisdiction over the instant lawsuit, as this action arises under the New Jersey Law Against Discrimination, *N.J.S.A.* 10:5-1 to -49, the New Jersey Civil Rights Act, *N.J.S.A.* 10:6-1 to -2, and other applicable common-law actions.

15. The acts complained of that are attributable to the defendants all occurred within the jurisdiction of this Court.

FACTS APPLICABLE TO ALL CLAIMS

16. Plaintiff VALERIE BLAUVELT was hired by the BOROUGH OF POINT PLEASANT BEACH as a Special II Law Enforcement Officer/Records Clerk on April 10, 2013.

17. Plaintiff VALERIE BLAUVELT attained full certification from the Police Training Commission as a Police Officer in 2007.
18. Plaintiff VALERIE BLAUVELT graduated from Monmouth University with a Bachelor of Arts degree in Criminal Justice with a concentration in forensics with a minor in information technology.
19. Plaintiff sought to be hired as a Police Officer BOROUGH OF POINT PLEASANT BEACH and applied numerous times, each time being passed over for promotion in favor of lower ranked male candidates on the respective Certification of Eligibles for Appointment.
20. A Certification of Eligibles for Appointment (“Certification of Eligibles”) is prepared by the New Jersey Civil Service Commission using a competitive process to evaluate candidates and candidates are ranked in order of merit based on testing by the New Jersey Civil Service Commission.
21. For instance, plaintiff scored number nine on a Certification of Eligibles dated May 21, 2014 and, despite her position on the appointment list, plaintiff was bypassed and a lower ranked male candidate was appointed.
22. By email dated October 29, 2014, then Chief of Police O’Hara advised he was planning to retire and sought to make appointments to the position of Police Officer noting plaintiff was available to promote and, since she was a Class II Special, he could use her and another candidate “immediately on the road to reduce overtime.”
23. On December 16, 2014, at a regular meeting of the Borough Council, then Mayor

Vincent R. Barella addressed the failure of Point Pleasant Beach to hire a female police officer and spoke out against a “conscious decision” to eliminate a female candidate, plaintiff, from consideration on the pretext that she was not a Borough resident because she was displaced from her residence by super storm Sandy. The Mayor stated he was convinced that if plaintiff “was a man with a similar service record, displaced under similar circumstances, Police leadership and council have viewed her involuntary interruption of residency differently.”

24. Plaintiff scored number three on a Certification of Eligibles dated April 17, 2017.
25. She was bypassed for promotion in favor of a male candidate.
26. Plaintiff scored number one on a Certification of Eligibles dated August 9, 2017.
27. Plaintiff was bypassed for promotion in favor of a male candidate.
28. Plaintiff scored number one on a Certification of Eligibles dated April 23, 2018.
29. On April 30, 2018, plaintiff advised the Appointing Authority she was interested in the position as Police Officer for the Borough of Point Pleasant Beach.
30. On May 16, 2018, Captain Matthew Duffy scheduled a physical fitness test.
31. On June 19, 2018, plaintiff was bypassed for selection and a male candidate was selected for the position.
32. On June 21, 2018, defendant EILEEN FARRELL was the Appointing Authority for defendant BOROUGH OF POINT PLEASANT BEACH meaning she had power of appointment and removal.
33. On June 19, 2018, defendant EILEEN FARRELL reported to the Civil Service

Commission that plaintiff was bypassed using code L1 (“Removed – Lacks Requirement for Position”).

34. On June 21, 2018, defendant EILEEN FARRELL was issued a Disposition Deficiency Notice by the Civil Service Commission and requested to provide documentation regarding removal of plaintiff from the Certification of Eligibles for Appointment pursuant to Disposition Code L1.

35. By email dated July 2, 2018, defendants EILEEN FARRELL and CHRISTINE RIEHL discussed pretextual ways to justify not appointing plaintiff despite her number 1 position on the Certification of Eligibles for Appointment.

36. This email noted that plaintiff was on lists in 2014, 2017 and 2018 and a lower ranking individual was appointed in all cases.

37. In each case, the lower ranked individual appointed was male.

38. Defendant EILEEN FARRELL in her email dated July 2, 2018 to defendant CHRISTINE RIEHL discussed pretextual ways to justify not appointing plaintiff including using F3 (“Removed – Failed Psychological Examination”) but ruled that out because they had “no documentation.”

39. Defendants JOSEPH MICHIGAN and CHRISTINE RIEHL had attempted to justify removal of plaintiff from her number 1 position on the Certification of Eligibles for Appointment because she had failed a Physical Training (PT) test given on June 5, 2018 arranged by Captain Matthew Duffy.

40. In an email dated July 6, 2018 from defendant EILEEN FARRELL to the Civil Ser-

vice Commission she requested permission to use M6 (“Removed – N.J.A.C. 4:4-4”) as a reason for not appointing plaintiff because she had been passed over on three prior occasions.

41. By letter dated July 12, 2018, defendant EILEEN FARRELL reported that plaintiff was less than truthful according to the Point Pleasant Beach Police Chief, which was untrue and a pretext for discrimination.

42. Defendant EILEEN FARRELL provided no additional information.

43. Defendant EILEEN FARRELL was advised by the Civil Service Commission that this response was insufficient to remove plaintiff and she responded by letter dated July 16, 2018.

44. The less than truthful allegation was based upon plaintiff stating she did not remember the specifics of an incident that occurred on April 3, 2016, which was true.

45. Accordingly, the shifting reasons for disqualifying plaintiff from appointment is proof of pretext for the real reason for not appointing plaintiff – because she is a woman in a male dominated profession in a male dominated police department.

46. As a direct and proximate result of the conduct of defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT, plaintiff VALERIE BLAUVELT suffered and continues to suffer loss of earnings and other employment benefits, severe mental, physical and emotional distress, stress, humiliation, pain, damage to reputation and harm to her career development.

47. Defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT

PLEASANT BEACH POLICE DEPARTMENT act through plaintiff's superior officers who are upper level managers and for whom defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT have *respondent superior* liability.

48. By and through the actions described herein, defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT have engaged in a continuing pattern and practice of discrimination against plaintiff VALERIE BLAUVELT and have created a harassing and hostile work environment for her because of her sex in violation of the NJLAD, *N.J.S.A. 10:5-1 et seq.*

49. Plaintiff VALERIE BLAUVELT engaged in protected activity when she opposed discrimination by contacting her elected representatives and seeking a fair and impartial appointment process for the position she sought – Police Officer.

50. As set forth above, defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT engaged in retaliation against plaintiff for opposing unlawful practices.

51. Defendants failed to protect plaintiff VALERIE BLAUVELT from continued harassment, discrimination, retaliation and defamation of character.

52. Knowing their obligation to keep plaintiff VALERIE BLAUVELT free from the aforementioned forms of harassment, they failed to do so, turned a blind eye, allowed the behavior to continue and, instead, took retaliatory action against plaintiff and allowed the discrimination and harassment to continue.

FIRST COUNT
VIOLATIONS OF THE NEW JERSEY LAW AGAINST DISCRIMINATION
(Sex Discrimination)

53. Plaintiff VALERIE BLAUVELT hereby repeats, realleges and incorporates by reference the paragraphs of this Complaint as if set forth at length herein.

54. Defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT act through plaintiff's superior officers who are upper level managers and for whom defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT have *respondeat superior* liability.

55. As a direct and proximate result of the conduct of defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT, plaintiff VALERIE BLAUVELT has suffered and continue to suffer loss of earnings and other employment benefits, severe mental, physical and emotional distress, stress, humiliation, pain, damage to reputation and harm to their career development.

56. By and through the actions described herein, defendants BOROUGH OF POINT PLEASANT BEACH and BOROUGH OF POINT PLEASANT BEACH POLICE DEPARTMENT have engaged in a continuing pattern and practice of discrimination and retaliation against plaintiff VALERIE BLAUVELT and have created a harassing and hostile work environment for her because of her sex in violation of the NJLAD, N.J.S.A. 10:5-1, *et seq.*

SECOND COUNT
VIOLATIONS OF THE NEW JERSEY LAW AGAINST DISCRIMINATION
(Retaliation)

57. Plaintiff repeats, realleges and incorporates by reference the allegations set above as if set forth at length herein.

58. By and through the actions described herein, defendants BOROUGH OF POINT PLEASANT BEACH and POINT PLEASANT BEACH POLICE DEPARTMENT, through their agents, servants, employees, independent contractors and co-conspirators have engaged in a continuing pattern and practice of retaliation against plaintiff VALERIE BLAUVELT in violation of the NJLAD, *N.J.S.A. 10:5-1, et seq.*, for opposing sexual discrimination and harassment.

59. As set forth above, defendants EILEEN FARRELL, CHRISTINE RIEHL and JOSEPH MICHIGAN by way of retaliating against plaintiff for petitioning government officials and opposing discrimination and harassment, discussed a number of pretextual excuses to bypass plaintiff for appointment to Police Officer to cover up the real reason for not appointing plaintiff – because she is a women in a male-dominated profession in a male-dominated police department.

THIRD COUNT
VIOLATIONS OF THE NEW JERSEY LAW AGAINST DISCRIMINATION
(Aiding and Abetting Discrimination Against Plaintiff)

60. Plaintiff repeats, realleges and incorporates by reference the allegations set above as if set forth at length herein.

61. The NJLAD prohibits conduct that aids or abets unlawful discrimination and re-

taliation.

62. Defendants EILEEN FARRELL, CHRISTINE RIEHL and JOSEPH MICHIGAN are upper level managers and/or decision makers regarding plaintiff.

63. Defendants EILEEN FARRELL, CHRISTINE RIEHL and JOSEPH MICHIGAN intentionally aided and abetted the employer's discrimination and harassment of plaintiff in violation of the NJLAD, *N.J.S.A. 10:5-1, et seq.*

64. Defendants EILEEN FARRELL, CHRISTINE RIEHL and JOSEPH MICHIGAN intentionally aided and abetted discrimination, harassment and retaliation against plaintiff by her employer and each other in violation of the NJLAD, *N.J.S.A. 10:5-1, et seq.*

65. As a direct and proximate result of the conduct of defendants, plaintiff VALERIE BLAUVELT has suffered and continues to suffer loss of earnings and other employment benefits, severe mental, physical and emotional distress, stress, humiliation, pain, damage to reputation and harm to their career development.

FOURTH COUNT
VIOLATIONS OF THE NEW JERSEY CIVIL RIGHTS ACT AND THE CONSTITUTION OF
NEW JERSEY

66. Plaintiff VALERIE BLAUVELT hereby repeats, realleges and incorporates by reference the paragraphs of this Complaint set forth above as if fully set forth here.

67. The conduct of the defendants individually and jointly has deprived plaintiff of rights secured by the New Jersey Constitution and the New Jersey Civil Rights Act.

68. As set forth more fully above, plaintiff VALERIE BLAUVELT was deprived of her right to substantive due process and/or equal protection and/or substantive rights, privi-

leges and/or immunities secured by the Constitution and/or laws of this State and her exercise or enjoyment of those substantive rights, privileges and/or immunities has been interfered with or attempted to be interfered with, by threats, intimidation and/or coercion by defendants who are persons acting under color of state law.

69. Each of the defendants conspired with the other defendants to deprive plaintiff VALERIE BLAUVELT of her rights secured by the Constitution and/or laws of this State and her exercise or enjoyment of those substantive rights, privileges and/or immunities has been interfered with and/or attempted to be interfered with, by threats, intimidation and/or coercion by defendants who are persons acting under color of state law.

PRAYER FOR RELIEF

WHEREFORE, plaintiff VALERIE BLAUVELT demands judgment against defendants for:

- a. Compensatory damages for loss of wages and benefits, pension losses, pain, suffering, stress, humiliation, mental anguish, and emotional harm;
- b. Damages for harm to reputation and career development;
- c. Consequential damages;
- d. Punitive damages (pecuniary and nonpecuniary), including but not limited to damages for extreme and intentional/negligent infliction of mental and emotional anguish, humiliation, anxiety, and distress;
- e. Reasonable counsel fees, costs and expenses incurred as a result of the defendants' wrongful acts, as provided for by the New Jersey Law Against Discrimination and New Jersey Civil Rights Act;
- f. Injunctive relief requiring remediation of defendants' discrimination and retaliation;

- g. Equitable relief, including restoring the benefits and terms and conditions of employment plaintiff has lost as a result of defendants' wrongful conduct and removing from plaintiff's record reference to disciplinary actions and matters motivated by retaliation against plaintiff for opposing discrimination and harassment that violates the New Jersey Law Against Discrimination and New Jersey Civil Rights Act and restoring to plaintiff benefits lost as a result of these disciplinary actions and matters; and
- h. Such other general or specific relief and damages, both at law and in equity, to which plaintiff may be justly entitled pursuant to Constitutional provision, statute or common law.

Respectfully submitted,

LAW OFFICE OF DONALD F. BURKE
Attorneys for Plaintiff
VALERIE BLAUVELT

By: s/ Donald F. Burke
Donald F. Burke, Esq.

Dated: November 1, 2019

DEMAND FOR JURY TRIAL

Plaintiff VALERIE BLAUVELT demands a trial by Jury as to all claims.

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to *Rule* 4:5-1(b)(2), it is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of our knowledge or belief. Also, to the best of our knowledge or belief, no other action or arbitration proceeding is contemplated. Further, other than the

parties set forth in this pleading, we know of no other parties that should be joined in the above action other than those identified as JOHN DOE defendants. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the court an amended Certification if there is a change in the facts stated in this original Certification.

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b).

DEMAND FOR PRODUCTION OF STATEMENTS

Plaintiff demands true and complete copies of any statements made by her pursuant to *Rule* 4:10-2(c). This demand is deemed to be continuing.

DESIGNATION OF TRIAL ATTORNEY

Pursuant to *Rule* 4:25-4, DONALD F. BURKE, ESQUIRE, is hereby designated as trial counsel in the above-captioned action on behalf of plaintiff.

Respectfully submitted,

LAW OFFICE OF DONALD F. BURKE
Attorneys for Plaintiff
VALERIE BLAUVELT

By: s/ Donald F. Burke
Donald F. Burke, Esq.

Dated: November 1, 2019

Civil Case Information Statement

Case Details: OCEAN | Civil Part Docket# L-002744-19

Case Caption: BLAUVELT VALERIE VS BOROUGH OF
PT. PLEASANT BEA

Case Initiation Date: 11/01/2019

Attorney Name: DONALD FRANCIS BURKE

Firm Name: DONALD F. BURKE

Address: 45 GALE RD

BRICK NJ 08723

Phone: 7329664922

Name of Party: PLAINTIFF : BLAUVELT, VALERIE

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? YES

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO

Title 59? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

11/01/2019

Dated

/s/ DONALD FRANCIS BURKE

Signed

OCEAN COUNTY SUPERIOR COURT
OCEAN COUNTY COURTHOUSE
CIVIL LAW DIVISION
TOMS RIVER NJ 08754

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 504-0700
COURT HOURS 8:30 AM - 4:30 PM

DATE: NOVEMBER 01, 2019
RE: BLAUVELT VALERIE VS BOROUGH OF PT. PLEASANT BEACH
DOCKET: OCN L -002744 19

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 E. BRENNER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (732) 504-0700.

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: DONALD F. BURKE
DONALD F. BURKE
45 GALE RD
BRICK NJ 08723

ECOURTS