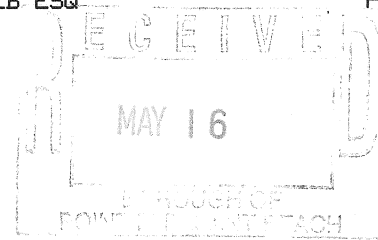


FRED J. GELB, ESQ.
 2253 Bridge Avenue
 Point Pleasant, New Jersey 08742
 (732) 892-4500
 Attorney for Plaintiff



DEBRA L. LARRABEE

Plaintiff,

vs.

BOROUGH OF POINT PLEASANT
 BEACH; LIEUTENANT JOSEPH A.
 MICHIGAN; POINT PLEASANT BEACH
 POLICE DEPARTMENT

Defendants

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION-OCEAN COUNTY

DOCKET NO. OCN-L- 001175-18

Civil Action

SUMMONS

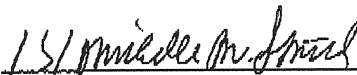
From the State of New Jersey to the Defendant(s) named above: **BOROUGH OF POINT PLEASANT BEACH**

The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the Complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A filing fee* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated :May 12, 2018


 Michelle M. Smith
 Clerk of the Superior Court

Name of Defendant to be Served: Borough Of Point Pleasant Beach

Address of the Defendant to be Served: 416 New Jersey Avenue Point Pleasant Beach, New Jersey 08742

*\$175.00 FOR CHANCERY DIVISION CASES OR \$175.00 FOR LAW DIVISION CASES

ATLANTIC COUNTY:
Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 343-3444
LEGAL SERVICES
(609) 348-1200

BERGEN COUNTY:
Deputy Clerk of the Superior Court
Case Processing Section, Room 119
Justice Center, 10 Main St.
Hackensack, NJ 07601-0769
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

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

JAMDEN COUNTY:
Deputy Clerk of the Superior Court
Civil Processing Office
1st Fl., Hall of Records
101 S. Fifth St.
Jandem, NJ 08103
LAWYER REFERRAL
(856) 964-4520
LEGAL SERVICES
(856) 964-2010

JAYE MAY COUNTY:
Deputy Clerk of the Superior Court
N. Main Street
Box DN-209
Jaye May Court House, NJ 08210
LAWYER REFERRAL
(909) 462-0312
LEGAL SERVICES
(909) 465-2001

LUMBERLAND COUNTY:
Deputy Clerk of the Superior Court
Civil Case Management Office
Broad & Fayette Sts., P.O. Box 615
Bridgeport, NJ 08802
LAWYER REFERRAL
(856) 892-4207
LEGAL SERVICES
(856) 461-0002

ESSEX COUNTY:
Deputy Clerk of the Superior Court
30 West Market Street
Room 131
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6207
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:
Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street, P.O. Box 129
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:
Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House—1st Floor
589 Newark Ave.
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6843

HUNTERDON COUNTY:
Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flamington, NJ 08822
LAWYER REFERRAL
(908) 735-2611
LEGAL SERVICES
(908) 732-7979

MERCER COUNTY:
Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:
Deputy Clerk of the Superior Court
Administration Building
Third Floor
1 Kennedy Sq., P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:
Deputy Clerk of the Superior Court
Court House
71 Monument Park
P.O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 368-0020

MORRIS COUNTY:
Deputy Clerk of the Superior Court
Civil Division
30 Schuyler Pl., P.O. Box 910
Morristown, NJ 07960-0910
LAWYER REFERRAL
(973) 267-3882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:
Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754
LAWYER REFERRAL
(732) 240-8688
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:
Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton St.
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 346-7171

SALEM COUNTY:
Deputy Clerk of the Superior Court
92 Market St., P.O. Box 13
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5623
LEGAL SERVICES
(856) 451-0005

SOMERSET COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
New Court House, 3rd Fl.
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:
Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07360
LAWYER REFERRAL
(973) 387-5382
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:
Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-4073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Salvadora, NJ 07523-1500
LAWYER REFERRAL
(973) 267-3882
LEGAL SERVICES
(973) 473-2010

OCN-L-001175-18 05/11/2018 4:02:23 PM Pg 1 of 3 Trans ID: LCV2018835774

FRED J. GELB, ESQ. ID# 02267-1975
 2253 Bridge Avenue
 Point Pleasant, New Jersey 08742
 (732) 892-4500
 Attorney for Plaintiff

DEBRA L. LARRABEE	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION-OCEAN COUNTY
Plaintiff,	:	DOCKET NO.
	:	
vs.	:	
	:	Civil Action
BOROUGH OF POINT PLEASANT	:	
BEACH; LIEUTENANT JOSEPH A.	:	COMPLAINT
MICHIGAN; POINT PLEASANT BEACH	:	and
POLICE DEPARTMENT	:	JURY DEMAND
	:	
Defendants	:	

The Plaintiff, Debra L. Larrabee, residing at 111 Forman Avenue in the Borough of Point Pleasant Beach, County of Ocean and State of New Jersey, by way of Complaint against the Defendants, says that :

FIRST COUNT

The Plaintiff, Debra L. Larrabee, by way of Complaint against the Defendants, Borough of Point Pleasant Beach, Lieutenant Joseph A. Michigan and Point Pleasant Beach Police Department, says:

1. On or about June 1, 2016, Plaintiff Debra L. Larrabee was a pedestrian, walking southbound on Route 35 North at the intersection with Laurel Avenue within the crosswalk, in the Borough of Point Pleasant Beach, County of Ocean, State of New Jersey.

2. At the aforesaid date and place, the Defendant Borough of Point Pleasant Beach was the owner of a motor vehicle which was being operated by it's servant, agent and /or employee, or

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individually by the Defendant Lieutenant Joseph A. Michigan a member of Defendant Point Pleasant Beach Police Department.

3. It then and there became the duty of the defendant operator, either individually, or as the servant, agent and /or employee of both the defendant owner and defendant police department, to operate and control his motor vehicle in such a careful and prudent manner so as to refrain from causing injury to any other pedestrian on the highway.

4. Notwithstanding the duties of the defendant operator, either individually or as the servant, agent and/or employee of both the defendant owner and defendant police department, he operated his motor vehicle in such a careless and negligent manner so that he caused his motor vehicle to collide with plaintiff and thus inflicted injuries upon the Plaintiff, Debra L. Larrabee and said injuries are more particularly hereinafter set forth.

5. As a direct and proximate result of the negligence and carelessness of the Defendants, this Plaintiff has suffered and sustained injuries in and about her arms, legs, face, head and body. She more particularly suffered internal and external injuries by reason of which she has been and will be unable to engage in her usual activities. She has suffered great pain and nervous shock and will in the future and so long as she shall live, suffer from pain and nervous shock. This Plaintiff has in the past and will in the future, be compelled to expend large sums of money for physicians, hospitals, surgeons, nurses, surgical appliances, x-rays, medications, bandages and other needed care to relieve and cure this Plaintiff of her said disability as a result of this accident. She has lost and will lose future earnings as a result of the injuries sustained in this accident.

6. Notice of Claim against the Defendant, Borough of Point Pleasant Beach, was given pursuant to Tort Claims Act, Title 59, specifically N.J.S.A. 59:8-9, on February 11, 2017 at 416 New

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Jersey Avenue, Point Pleasant Beach New Jersey 08742, pursuant to Order entered January 27, 2017, in the Superior Court of New Jersey, Ocean County, by the Honorable James Den Uyl, J.S.C.

7. Notice of Claim against the Defendant, Lieutenant Joseph A. Michigan, was given pursuant to Tort Claims Act, Title 59, specifically N.J.S.A. 59:8-9, on February 11, 2017 at 416 New Jersey Avenue, Point Pleasant Beach, New Jersey 08742, pursuant to Order entered on January 27, 2017 in the Superior Court of New Jersey, Ocean County, by the Honorable James Den Uyl, J.S.C.

8. Notice of Claim against the Defendant, Point Pleasant Beach Police Department, was given pursuant to Tort Claims Act, Title 59, specifically N.J.S.A. 59:8-9 on February 11, 2017 at 416 New Jersey Avenue, Point Pleasant Beach, New Jersey 08742, pursuant to Order entered on January 27, 2017 in the Superior Court of New Jersey, Ocean County, by the Honorable James Den Uyl, J.S.C.

9. Plaintiff suffered permanent loss of bodily functions, permanent disfigurements and permanent dismemberments and has medical treatment expenses in excess of \$3,600.00, and has met the requirements of N.J.S.A. 59:-9-2.

WHEREFORE, Plaintiff, Debra L. Larrabee, demands judgment against the Defendants for compensatory damages, together with interest, costs of suit and attorney's fees.

PLAINTIFF DEMANDS A TRIAL BY JURY AS TO ALL ISSUES

I hereby certify that the matter in controversy is not the subject of any other action pending in any other Court; there is no pending arbitration proceedings and further certify that no other action is contemplated.

FRED J. GELB, ESQ.

Attorney for Plaintiff

Dated: May 11, 2018

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Civil Case Information Statement

Case Details: OCEAN Civil Part Docket# L-001175-18**Case Caption:** LARRABEE DEBRA VS BOROUGH OF
POINTPLEA SANT BEAC**Case Initiation Date:** 05/11/2018**Attorney Name:** FRED J GELB**Firm Name:** FRED J. GELB**Address:** 2253 BRIDGE AVENUE**PT PLEASANT NJ 087420000****Phone:****Name of Party:** PLAINTIFF : Larrabee, Debra, L**Name of Defendant's Primary Insurance Company**
(If known): Unknown**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)**Document Type:** Complaint with Jury Demand**Jury Demand:** YES - 6 JURORS**Hurricane Sandy related?** NO**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)?** NO**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?** NO**If yes, Is that relationship:****Does the statute governing this case provide for payment of fees by the losing party?** NO**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:****Do you or your client need any disability accommodations?** NO**If yes, please identify the requested accommodation:****Will an interpreter be needed?** NO**If yes, for what language:****I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)****05/11/2018**
Dated**/s/ FRED J GELB**
Signed

OCN L 001175-18 05/12/2018 5:09:10 AM Pg 1 of 1 Trans ID: LCV2018839287

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

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 929-2016
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 11, 2018
RE: LARRABEE DEBRA VS BOROUGH OF POINT PLEASANT BEACH
DOCKET: OCN L -001175 18

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 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 MARK A. TRONCONE

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (732) 929-4771 EXT 4771.

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: FRED J. GELB
FRED J. GELB
2253 BRIDGE AVENUE
PT PLEASANT NJ 08742

ECOURTS