



July 1, 2020

Taeho Kim

Sent via email: opra+request-12451-a47e60b4@requests.opramachine.com

The Evesham Township Clerk's Office received your Open Public Records Act (OPRA) request on **May 27, 2020**. The Evesham Township Police Department Records Custodian received your OPRA request on **May 28, 2020**. The seven (7) business day deadline to respond to your request was **June 8, 2020**. A request for extension to **July 10, 2020** was sent to you on **May 28, 2020**. This response to your request is being provided to you prior to the extended deadline.

The records below are responsive to your OPRA request for: "...1. A list of all lawsuits and cases in which any officer of the police department was involved between 2012 and 2019. For each lawsuit/case, please provide the date (month and year) of the alleged incident at issue, whether the alleged incident was excessive force, settlement amount (if any), and final compensation amount ruled (if any). 2. Please provide copies of the complaint in any lawsuits and cases described above. ...".

Document	Notes
Email Regarding Lawsuit List	The Evesham Police Department does not maintain a "list of all lawsuits and cases..." Notice of Tort Claims are given an Internal Affairs number and are noted by month; list pulled from that database. Other than IA number assignment, no other requested information or data is retained by the Evesham Police Department.
Complaints	Attached are records received by the Evesham Police Department since 2019. There are no records responsive for the remaining items

If your request for access to a government record has been denied or unfilled within the seven (7) business days required by law, you have a right to challenge the decision by the Evesham Township Police Department to deny access. At your option, you may either institute a proceeding in the Superior Court of New Jersey or file a complaint with the Government Records Council (GRC) by completing the Denial of Access Complaint Form. You may contact the GRC by toll-free telephone at 866-850-0511, by mail at P.O. Box 819, Trenton, NJ, 08625, by e-mail at grc@dca.state.nj.us, or at their web site at www.state.nj.us/grc. The GRC can also answer other questions about the law. All questions regarding complaints filed in Superior Court should be directed to the Court Clerk in your County.

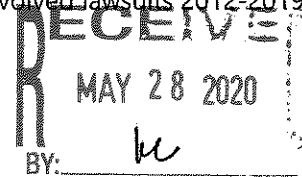
Sincerely,

A handwritten signature in black ink, appearing to read "Katherine Corbett".

Katherine Corbett
Risk Management Coordinator
Evesham Township Police Department
984 Tuckerton Road
Evesham NJ 0805

Corbett, Katherinedone 6/8/20, request
returned 7/10/20 on 5/24/20

From: Bergh, Mary Lou
Sent: Wednesday, May 27, 2020 3:13 PM
To: Corbett, Katherine
Subject: FW: OPRA request - OPRA: police officer-involved lawsuits 2012-2019



Kate I think this one is yours. I have no idea what they are looking for.

-----Original Message-----

From: Taeho Kim [mailto:opra+request-12451-a47e60b4@requests.opramachine.com]
Sent: Wednesday, May 27, 2020 2:29 PM
To: Bergh, Mary Lou <berghm@evesham-nj.gov>
Subject: OPRA request - OPRA: police officer-involved lawsuits 2012-2019

Dear Evesham Township,

This is a request for public records made under OPRA and the common law right of access. I am not required to fill out an official form. Please acknowledge receipt of this message.

Records requested:

1. A list of all lawsuits and cases in which any officer of the police department was involved between 2012 and 2019. For each lawsuit/case, please provide the date (month and year) of the alleged incident at issue, whether the alleged incident was excessive force, settlement amount (if any), and final compensation amount ruled (if any).
2. Please provide copies of the complaint in any lawsuits and cases described above.

Yours faithfully,

UC Research

Please use deliver records electronically via email to the below UNIQUE address for all replies to this request:
opra+request-12451-a47e60b4@requests.opramachine.com

Is berghm@evesham-nj.gov the wrong address for OPRA requests to Evesham Township? If so, please contact us using this form:
https://opramachine.com/change_request/new?body=evesham_township

Disclaimer: This message and any reply that you make will be published on the internet. Our privacy and copyright policies:
<https://opramachine.com/help/officers>

View this OPRA request & responses online:
https://opramachine.com/request/opra_police_officer_involved_law_57

Please note that in some cases publication of requests and responses will be delayed.

Approved in part, no
response given for some
item 2
 7/1/20

If you find this service useful as an OPRA custodian, please ask your web manager to link to us from your organisation's website.

Corbett, Katherine

From: Friel, Joseph
Sent: Tuesday, June 02, 2020 12:25 PM
To: Corbett, Katherine
Subject: RE: OPRA request - OPRA: police officer-involved lawsuits 2012-2019

Here are the suits

12-06 Anthony Scott	Complainant arrested for receiving stolen property/CDS, claims malicious prosecution & violation of civil rights
12-82 Chris Hartman	Complainant filed a civil tort for improper search following arrest for DWI and obtainment of urine sample.
13-14 Robert Chikin	Complainant reported improper arrest and denial of freedom in civil tort from mva stop and warrant arrest.
13-36 Dina Panrella	Complainant filed civil tort for civil rights violation following arrest for DWI and male officer's observation of urination sample.
14-46 Linda Jenkins	Civil tort resulting from MVA at extra duty employment (road construction)
14-70 Timothy Broderick	Tort claim based on arrest contrary to Overdose Prevention Act
14-79 Oleg Shutman	Tort claim filed by complainant for excessive force and demeanor exhibited by officers
15-47 Douglas Mele	Civil tort notice received for arrest on February 19, 2015 (TORT)
15-60 Juliu Trindade 12/18/15	Civil tort notice received for incident investigated on 10/17/2014 (TORT) Settled
15-121 Sally Schulz	Tort Notice - Complainant reported injuries sustained as a result of handcuffing/improper search of vehicle.
16-09 Jill Roass	TORT notice - Complainant reported injuries sustained while being pulled from her vehicle during motor vehicle stop.
16-78 Maureen Defrehn	TORT notice - Complainant reported injuries sustained when traffic signal fell on her vehicle.
17-48 Peter DiPietro	TORT-Soverign citizen complaint - improper arrest and improper search
17-74 Timothy Lavdas	TORT - Accused officer performed sternum rub to arrestss which reportedly caused bodily injury.
20-01 Doug Burnham	Tort Claim - False Arrest
20-11 David Petersen	Tort Claim - Petersen vs. Evesham Twp.
20-20 Paul Middleman	Tory Claim

Lieutenant Joseph Friel
Internal Affairs Bureau Commander
Public Information Officer
Evesham Police Department
Desk - 856-985-4347
Cell - 856-685-6293
frielj@eveshampd.org



Philip S. Burnham, II, Esq.
Licensed in NJ & PA
Atty ID 030951990

Not a Partnership
www.burnhamdouglass.com
info@burnhamdouglass.com

Michelle J. Douglass, Esq., Of Counsel
Licensed in NJ
Certified as a Civil Trial Lawyer by the Supreme Court of NJ
Atty ID 025091988

December 27, 2019

Certified Mail and Regular Mail: 70191120000146155586

State of New Jersey Office of the Attorney General RJH Justice Complex
ATTN: Gurbir S. Grewal, Attorney General
25 West Market Street
Trenton, NJ 08625-0080

HAND DELIVERY

Burlington County
Burlington County Administration Building
50 Rancocas Road; 3rd Floor
Mt. Holly NJ 08060

Certified Mail and Regular Mail: 70191120000146155616

Attn: Scott Cofina
Burlington County Prosecutor
49 Rancocas Road;
Mt. Holly NJ 08060

HAND DELIVERY

Township of Evesham
984 Tuckerton Road
Marlton NJ 08053

HAND DELIVERY

Evesham Township Police Department
Attn: Christopher Crew, Chief of Police
984 Tuckerton Road
Marlton, NJ 08053

Main office: 8000 Sagemore Dr, Ste 8303, Marlton, NJ 08053 T: 856-751-5505 Fax: 856-751-5516
Somers Point Office: 207 Shore Rd., Ste. 2, Somers Point, NJ 08244, T: 609-788-3595

This correspondence contains confidential material and may not be used for purposes inimical to NJ Evidence Rule 408 regarding settlement negotiations.

December 27, 2019

Page 2

Certified Mail and Regular Mail: 70191120000146155593

Camden County
Camden County Administration Building
520 Market Street
Camden, NJ 08102

Certified Mail and Regular Mail: 70191120000146155654

Attn: Jill S. Mayer
Camden County Prosecutor
200 Federal Street
Camden, NJ 08103

Certified Mail and Regular Mail: 70191120000146155630

Voorhees Township
2400 Voorhees Town Center
Voorhees, NJ 08043

Certified Mail and Regular Mail: 70191120000146155609

Voorhees Police Department
ATTN: Chief of Police: Louis Bordi
1180 White Horse Road
Voorhees, NJ 08043

RE: Philip S. Burnham, II
Date of Incident: 10/03/2019

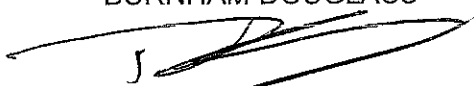
Dear Sir/Madam:

Please be advised that this office represents Philip S. Burnham, II, for damages sustained as a result of an incident that occurred on or about October 3, 2019.

Enclosed please find a completed Initial Claims for Damages as well as all requested documentation currently available. Additional information will be forwarded upon receipt of same.

Please do not hesitate to contact me if you should have questions regarding the enclosed.

Very truly yours,
BURNHAM DOUGLASS



Philip S. Burnham, Esq.

PSB/tdm

Enclosure

This correspondence contains confidential material and may not be used for purposes inimical to NJ Evidence Rule 408 regarding settlement negotiations.

INITIAL NOTICE OF CLAIM FOR DAMAGES

1. Philip S. Burnham, II 4013 Hermitage Drive
Name of Claimant *Street Address*

10/04/1964
Date of Birth

Voorhees, NJ 08043
City, State, Zip Code

856-751-5505
Home Telephone Number

006-64-9760
Social Security Number

Telephone number at which you can be reached during the hours of 9:00 a.m. and 5:00 p.m.: (856)751-5505

2. *If it is requested that notices be sent to a person other than claimant, state:*

BURNHAM DOUGLASS
8000 SAGEMORE, SUITE 8303
MARLTON, NJ 08053
(856)751-5505

Relationship to claimant: Self

3. *The incident or occurrence:*

Date of Occurrence:

September 6, 2019 through October 4, 2019 and continuing thereafter as to publications on the internet.

The Place of Occurrence:

4013 Hermitage Drive, Voorhees, New Jersey;
8000 Sagemore Drive, Marlton, New Jersey
54 Grant Street, Mt. Holly, New Jersey

And other locations throughout the United States due to publications.

Describe the incident or occurrence:

On September 6, 2019, Philip Burnham was illegally questioned at his residence, wrongfully detained, and assaulted at his residence while surrounded by multiple police departments. Thereafter, on October 3, 2019, he was illegally arrested and falsely imprisoned by Detective Christopher DeFrancesco. Additionally, Detective DeFrancesco intentionally did not process Mr. Burnham's fingerprints correctly, and then had an Evesham officer illegally transport Philip Burnham to the Burlington County jail where he was not released until late on October 4, 2019.

Additionally, the Evesham police department published false and defaming Facebook post(s) on the Evesham Police Facebook page and thereafter the article(s) were subsequently published on numerous other websites and publications.

Additionally, the Voorhees Police Department allowed Officer Ptl. Lynch of Evesham Police Department to issue motor vehicle violations from a Voorhees Ticket Book against Philip Burnham and participated in the above incidents.

All such actions proximately causing injury to the Plaintiff.

State the names and addresses of all witnesses:

Anyone identified in the Evesham Township case report #2019-00022524. Additionally, Diane Burnham, all officers listed in the police report, Chief of Police of Evesham, Burlington Prosecutor Office employees whose names are unknown at this time, Chief of Police of Voorhees. Other witnesses to be identified as discovery continues.

4. a) *State the name and address of each State/County/Municipality and/or governmental agency employee whom you claim caused your damages or injuries.*

State of New Jersey, Attorney General
Burlington County
Evesham Township
Evesham Township Police Department
Camden County
Voorhees Township Police Department

b) *State the name and address of all other persons, companies, or governmental agencies whom you claim are responsible for your injuries or damages.*

See Exhibit A as well as others to be determined.

5. *Briefly describe the injury, damages and losses incurred by you.*

Emotional distress, embarrassment, humiliation, frustration, extreme inconvenience, PTSD, anxiety and panic attacks, loss of liberty, false imprisonment, loss of reputation, loss of business and business clients, as well as other losses, damages and injuries.

The amount of money claimed by the claimant to be total compensation for the injury suffered, as of the date of claim, together with a statement setting forth the method of computation of the amount, detailed as follows:

(1) All amounts claimed for property damages, stating the source or sources from which valuation was derived: NONE AS OF THIS DATE.

(2) All amounts claimed as medical expenses up to date of claim: TO BE DETERMINED.

(3) All amounts claimed as damages for pain and suffering: THIS REQUEST IS PREMATURE AS THE NATURE AND FULL EXTENT OF PLAINTIFF'S INJURY IS NOT YET REALIZED, HOWEVER, PLAINTIFF CONTINUES TO SUFFER ECONOMIC DAMAGES BASED ON THE LOSS OF HIS INCOME, HEALTH ISSUES AND EMBARRASSMENT AS WELL AS EMOTIONAL DISTRESS DAMAGES.

(4) All amounts claimed as lost wages as a result of the occurrence, as of the date of claim: THIS REQUEST IS PREMATURE AS THE NATURE AND FULL EXTENT OF PLAINTIFF'S INJURY IS NOT YET REALIZED, HOWEVER, PLAINTIFF CONTINUES TO SUFFER ECONOMIC DAMAGES BASED ON THE LOSS OF HIS CLIENTS, REPUTATION AS WELL AS EMOTIONAL DISTRESS DAMAGES.

(5) Estimated future medical expenses, with a detailed statement of anticipated expenses and the source of the information: THIS REQUEST IS PREMATURE AS THE NATURE AND FULL EXTENT OF PLAINTIFF'S INJURY IS NOT YET REALIZED, HOWEVER, PLAINTIFF CONTINUES TO SUFFER ECONOMIC

DAMAGES BASED ON THE LOSS OF HIS CLIENTS, REPUTATION AS WELL AS EMOTIONAL DISTRESS DAMAGES.

(6) Estimated future lost wages, stating specifically the means of computation of said lost wages, including the amount of previous and present wages on an annual basis and the duration of diminished earning capacity. SEE ABOVE.

H. The claimant shall attach copies of the following to the notice of claim required hereunder:

(1) Written reports of all examining and/or treating medical, dental or other health care professionals, setting forth the following:

(a) The nature and extent of injury. EMOTIONAL DISTRESS DAMAGES, THE FULL EXTENT OF WHICH IS UNKNOWN AT THIS TIME.

(b) Detailing all treatment given to the date of claim. DR. KEITH RADBILL, CHERRY HILL, NJ, GENERAL PRACTITIONER, SEPTEMBER 2019 THROUGH TO PRESENT, FOR STRESS AND ANXIETY RELATED TO THE INCIDENTS.

(c) Stating specifically and in detail the type and cause of all temporary disability resulting from the occurrence. NONE.

(d) Stating specifically and in detail the type and cause of all permanent disability which will, in the treating physician's judgment, result from the injury sustained. UNKNOWN.

(e) A detailed prognosis, stating at which point in time any temporary disability will be resolved. NONE TO DATE.

(f) The period of hospitalization of the claimant, if any. NONE TO DATE.

(g) Any limitation, temporary or permanent, on the claimant's ability to pursue his or her employment as a result of the injuries and the extent and duration of any such limitation. NONE TO DATE.

(2) A list of the names and addresses of all expert witnesses, together with copies of all reports rendered in writing with respect to the claim and a summary of all oral reports or statements. NONE TO DATE.

(3) Complete and itemized bills and/or receipts for all medical, dental and hospital expenses incurred. TO BE SUPPLIED.

20 FEB 11 16:39

SUMMONS

Attorney(s) Gregg L. Zeff, Esq.; Eva C. Zelson, Esq.

Office Address 100 Century Parkway, Suite 160

Town, State, Zip Code Mount Laurel, NJ 08054

Telephone Number _____

Attorney(s) for Plaintiff Gregg L. Zeff, Esq.; Eva C. Zelson,

David Petersen

Plaintiff(s)

vs.

Evesham Township

Defendant(s)

Superior Court of New Jersey

Burlington County

Law Division

Docket No: BUR-L-000346-20

CIVIL ACTION SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is 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.

/s/Michelle M. Smith

Clerk of the Superior Court

DATED: 2/11/2020

Name of Defendant to Be Served: Evesham Township

Address of Defendant to Be Served: 984 Tuckerton Road Evesham, NJ 08053

ZEFF LAW FIRM, LLC

Gregg L Zeff, Esquire #042531988
Eva C. Zelson, Esquire #153832015
100 Century Parkway , Suite 160
Mount Laurel, NJ 08054
(856) 778-9700 (T)
(609) 534-0992 (F)
gzeff@glzefflaw.com

Attorneys for Plaintiff

DAVID PETERSEN
209 Orchard Avenue
Somerdale, NJ 08083

: IN THE SUPERIOR COURT OF NEW
JERSEY BURLINGTON COUNTY

Plaintiff, :

: DOCKET NO.

vs. :

EVESHAM TOWNSHIP
984 Tuckerton Road
Evesham, NJ 08053

:

Defendants. :

: **COMPLAINT**
: JURY TRIAL DEMAND
:

COMPLAINT

David Petersen, (Plaintiff), by and through his attorneys the Zeff Law Firm, LLC, hereby bring this Complaint against the Township of Evesham ("Defendant"), a municipality in withing the State of New Jersey and in support thereof aver as follows:

THE PARTIES

1. Plaintiff David Petersen is Caucasian male residing at the above-listed address.
2. At all times relevant hereto, Plaintiff was and is employed as a police officer for Defendant, Township of Evesham.
3. Defendant Township of Evesham is a municipal corporation operating under the laws of New Jersey and Evesham. Defendant operates a Police Department, which employs Plaintiff.

STATEMENT OF FACTS

4. Plaintiff began working for Defendant in or around 2005 as a patrolman.
5. Throughout the beginning of Plaintiff's career with Defendant until in or around 2017 Plaintiff had good evaluations and became the Union Vice President in 2008-2009.
6. On or around April 6, 2019 Plaintiff was sick and unable to work his scheduled shift of 1000-2200 because he had the flu.

19. Additionally, it was said that on or around April 6, 2019 at the sick visit that Jessica Lettieri answered Plaintiff's door in a towel when Lieutenant Siitonen came, which is false.
20. Plaintiff reached out to Lieutenant Friel (an Internal Affairs Lieutenant for Defendant) and explained that he would like an inquiry done through the CJIS about the possible illegal run of Jessica Lettieri's tag.
21. Initially Lieutenant Friel would not do the inquiry, and stated "you're not going to tell me how to run my investigation." he then changed his mind and texted Plaintiff asking for a copy of both Plaintiff and Jessica Lettieri's registrations.
22. Plaintiff sent copy of both registrations, once the inquiry was completed Plaintiff was not informed of the findings.
23. It was confirmed during a meeting between Jessica Lettieri, the Chief at the Burlington County Prosecutor's Office and IA Assistant Prosector that Jessica Lettieri's tag had been run.
24. After the inquiry into Lieutenant Siitonen, Lieutenant Siitonen went to Chief Chew (Chief of Defendant) and informed him that Plaintiff had a relationship with Jessica Lettieri.
25. The passing of this information created hardship for Plaintiff because Chief Chew was unhappy with Jessica Lettieri for leaving the department and going to Burlington County Prosecutor's office.
26. In retaliation for his relationship with Jessica Lettieri and his complaint about the reading of her license plate, Plaintiff was subjected to disciplinary actions and hearings and was ultimately suspended without pay.
27. On or around April 11, 2019 Plaintiff was called in to the conference room with Chief Chew, Lieutenant Friel and Captain Reinholt. Chief Chew yelled at Plaintiff regarding Plaintiff's three demeanor complaints, three motor vehicle accidents and "abuse of sick time."
28. At this same meeting, Plaintiff was then placed on a Performance Improvement Plan.
29. On or around May 14, 2019 Plaintiff was approached by officer TJ Schwartz who stated Plaintiff's dating/ sex life with Jessica Lettieri was being discussed by supervisors and other officers in the Evesham Township Police range including comments that Jessica Lettieri answered Plaintiff's door in a towel.
30. On or around May 16, 2019 Plaintiff was approached by Officer Marc Morgan (an officer of Defendant) who advised Plaintiff that Plaintiff and Jessica Lettieri were being discussed in a group text message regarding their personal relationship.

31. On or around May 17, 2019 Plaintiff called Sergeant Scutt (on duty supervisor at Defendant) and advised him that he wanted to make a formal complaint against Sergeant Thomas Campbell (a sergeant of Defendant).
32. Sergeant Scutt advised Plaintiff that he was activating his body worn camera and took the complaint.
33. Captain Reinholt (a captain at Defendant) called Plaintiff to let him know that he was made aware of the complaint, and that an internal investigation would be started regarding this matter.
34. On or around June 11, 2019 Plaintiff was served with an Internal Investigation)IA Case No.: 2019-018) which stated he was being charged with repeated rules violations for failing to keep all aspects of internal affairs investigation case 19-016, in strict confidence, insubordination-related to internal affairs investigation 19-016, a direct order not to discuss internal affairs investigation, and obedience to laws, regulations and orders-V6C31 on duty cellular phone use.
35. On or around the second week in July 2019 Plaintiff met with Corporal Bourdon (a corporal of Defendant), and Sergeant Scutt at Fireside Diner located at 401 Woodbury Glassboro Road, Sewell, NJ 08080.
36. Sergeant Scutt said that he wanted to inform Plaintiff about administrations plans. During the meeting Plaintiff was told that Chief Chew and Lieutenant Friel (a lieutenant of Defendant) wanted to "paper Plaintiff up" so that he would be terminated.
37. On or around July 26, 2019 Plaintiff was served with an Internal Affairs claim (IA Case 2019-022) which stated that Plaintiff was being charged with 3.2.10 conduct unbecoming of a police officer which is a class two (2) offense.
38. During this Internal Affairs investigation Plaintiff was advised that he was being charged with thirty (30) additional charges but they were willing to drop them.
39. Chief Chew stated that everyone is on the same team that they (referring to Plaintiff and Jessica Lettieri) need to "move on" and "take care of each other" referring to everyone being in law enforcement and needing to stick together.
40. For this investigation Plaintiff received a three (3) day suspension.
41. On or about September 2, 2019 Sergeant Dixon informed Plaintiff that he was assigned to watch Plaintiff.

42. On or around October 1, 2019 Plaintiff was contacted by Captain Reinholt in regarding an investigation, and assured Plaintiff multiple times that it was not an Internal Affairs investigation but rather an independent investigation that was being done by the township.
43. On or around October 10, 2019 Plaintiff's interview for the Township was conducted.
44. Plaintiff initially stated he did not want to participate in the interview due to fear of retaliation.
45. Plaintiff was advised by Orlando Murphy that he must participate in the interview.
46. On or around December 4, 2019 Plaintiff was served with Internal Affairs case 2019-049 which stated he was being charged with code of ethics, repeated violations (class one (1) offenses) conducting unbecoming conduct of a police officer (class two (2) offense), unauthorized investigations (class two (2) offense), confidentiality (class two (2) offense), insubordination (class two (2) offense), loyalty (class three (3) offense), gossip (class three (3) offense), reporting violations of laws, rules, policies and procedures (class three (3) offense), conduct towards a superior or subordinate officer and associates (class four (4) offense), obedience to laws, regulations and orders.
47. But for Plaintiff's complaint that Jessica Lettieri's license plate was illegally run, he would not have been disciplined or would have received less discipline.

JURISDICTION AND VENUE

48. Jurisdiction is properly laid in this Court as Defendant is subject to personal jurisdiction in the State of New Jersey.
49. Moreover, Plaintiff's cause of action arises out of Defendants' acts and/or omissions which occurred primarily in Burlington County, New Jersey.

COUNT I

N.J.S.A. 34:19-1 et seq.

CONSCIENTIOUS EMPLOYEE PROTECTION ACT

50. Plaintiff repeats and re-alleges each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.

51. By and through its course of conduct as alleged herein, Defendant violated CEPA by causing Plaintiff to be internally investigated on three (3) separate occasions and to suffer adverse employment actions, including loss of money.
52. Defendants' conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.
53. As a direct and proximate result of Defendants' violations of Plaintiff's rights under CEPA, Plaintiff has suffered and will continue to suffer severe harm, and is entitled to all legal and equitable remedies available under CEPA, including, but not limited to, back pay, front pay, reinstatement, restoration of benefits and seniority, and compensatory and punitive damages, in amounts to be determined at trial.
54. Plaintiff is further entitled to an award of reasonable attorney's fees and costs and any other relief that this court deems just and proper under the circumstances.

ZEFF LAW FIRM, LLC

/s/Gregg L. Zeff, Esq.
Gregg L. Zeff, Esquire
Eva C. Zelson, Esquire
Attorneys for Plaintiff

Dated: February 10, 2020

JURY DEMAND AND TRIAL COUNSEL DESIGNATION

Please take notice that Plaintiff hereby demands a trial by jury as to all issues and that pursuant to rule 4:25-4, Gregg L. Zeff, Esquire, is hereby designated as trial counsel in the above captioned matter on behalf of The Zeff Law Firm, LLC.

CERTIFICATION

I certify pursuant to Rule 4:5-1 that I know of no other proceedings pending or that are contemplating in any court or arbitration proceeding that concerns this subject matter and know of no other parties that need be joined with action.

ZEFF LAW FIRM, LLC

/s/Gregg L. Zeff, Esq.
Gregg L. Zeff, Esquire
Eva C. Zelson, Esquire
Attorneys for Plaintiff

Dated: February 10, 2020

Civil Case Information Statement

Case Details: BURLINGTON | Civil Part Docket# L-000346-20

Case Caption: PETERSON DAVID VS EVESHAM
TOWNSHIP

Case Initiation Date: 02/10/2020

Attorney Name: GREGG L ZEFF

Firm Name: ZEFF LAW FIRM, LLC

Address: 100 CENTURY PKWY STE160

MT LAUREL NJ 08054

Phone: 8567789700

Name of Party: PLAINTIFF : Peterson, David

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE
PROTECTION ACT (CEPA)

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)?** NO

Are sexual abuse claims alleged? 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? 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 Consumer Fraud? 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)

02/10/2020

Dated

/s/ GREGG L ZEFF

Signed

BURLINGTON COUNTY
SUPERIOR COURT
49 RANCOCAS ROAD
MT HOLLY NJ 08060

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 288-9500
COURT HOURS 8:30 AM - 4:30 PM

DATE: FEBRUARY 10, 2020
RE: PETERSON DAVID VS EVESHAM TOWNSHIP
DOCKET: BUR L -000346 20

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 SUSAN L. CLAYPOOLE

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (609) 288-9500.

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: GREGG L. ZEFF
ZEFF LAW FIRM, LLC
100 CENTURY PKWY
STE160
MT LAUREL NJ 08054

ECOURTS

INITIAL NOTICE OF CLAIM FOR DAMAGES AGAINST THE STATE OF NEW JERSEY

TOWN OF ESHAM POLICE DEPARTMENT

FORWARD TO: TORT AND CONTRACT UNIT
DEPARTMENT OF THE TREASURY, BUREAU OF RISK MGMT.
PO BOX 620
TRENTON, NEW JERSEY 08625
PHONE: (609) 292-4347

FORM MUST BE FILED WITHIN 90 DAYS OF THE ACCIDENT OR YOU MAY FORFEIT YOUR RIGHT

1. CLAIMANT:

Middleman PAULA ANGELA
LAST NAME FIRST MIDDLE

115 Kettle Run Road
MARLTON NJ 08053

ADDRESS

MAILING ADDRESS IF OTHER THAN ADDRESS

856-392-6350

Telephone

12/24/1953

DATE OF BIRTH

140-46-8758

SOCIAL SECURITY NUMBER

2. IF NOTICES AND CORRESPONDENCE IN CONNECTION WITH THIS CLAIM ARE TO BE SENT TO A PERSON OTHER THAN CLAIMANT, COMPLETE ITEM #2.

Tort And Contracting Unit

NAME

Dept of Treasury
PO Box 620 Trenton, NJ 08625

ADDRESS

MAILING ADDRESS

TELEPHONE

RELATIONSHIP TO CLAIMANT: ATTORNEY AT LAW ☐ OR

STATE Entity of New Jersey

EXPLAIN RELATIONSHIP

3. CIRCUMSTANCES REGARDING THE OCCURRENCE OR ACCIDENT:

Alleged Investigation

2/19/20

DATE

TIME

115 Kettle Run Road Marlton NJ 08053 / Garage

EXACT LOCATION OF THE OCCURRENCE

4. DESCRIBE THE ACCIDENT OR OCCURENCE.

I WAS being restrained by my ARMS (Left & Right) with extreme force by DET. Hughes AND PTL Tighe, while standing and stepping on my feet, PTL Tighe grabbed AND twisted my RIGHT wrist AND arm, behind my back, using extreme force, I hollered to them they were hurting me, DET. Hughes had the left using extreme force, while HAND cuffing me. In the patrol car, I told PTL Tighe the cuffs were hurting me.

5. STATE THE NAME AND ADDRESS OF ALL WITNESSES TO THE ABOVE ACCIDENT OR OCCURRENCE.

DET. PATRICK HUGHES - EVERSLAM POLICE DEPT
PTL. TIGHE - EVERSLAM POLICE DEPT
PTL. RICHARD HERNANDEZ - EVERSLAM POLICE DEPT
LIEUTENANT SUTTON - EVERSLAM POLICE DEPT
Sgt. DAVIS, BRYAN - EVERSLAM POLICE DEPT
Sgt. STERN - EVERSLAM POLICE DEPT
OFFICER TORRES - EVERSLAM POLICE DEPT
ROBERT AGNONI - EVERSLAM POLICE DEPT

JAN: JOHN DOE POLICE OFFICERS
EVERSLAM POLICE DEPT
CHRISTOPHER CHOW - CHIEF OF POLICE
CHRISTOPHER SMITH
115 KETTER RUN ROAD
MANLTON NJ 08053

6. STATE THE NAMES AND ADDRESSES OF EACH STATE AGENCY OR AGENCIES AND EACH STATE EMPLOYEE WHOM YOU CLAIM CAUSED YOUR DAMAGES OR INJURIES.

TOWNSHIP OF EVERSLAM POLICE DEPT
984 TUCKERTON ROAD
MANLTON NJ 08053
DET. PATRICK HUGHES
PTL. TIGHE
JAN: JOHN DOE POLICE OFFICERS

7. STATE THE NAME AND ADDRESS OF ALL OTHER PERSONS, COMPANIES OR GOVERNMENTAL AGENCIES WHICH YOU CLAIM ARE RESPONSIBLE FOR YOUR INJURIES OR DAMAGES.

TOWNSHIP OF EVERSLAM POLICE DEPT
984 TUCKERTON ROAD
MANLTON NJ 08053
DET. PATRICK HUGHES
PTL. TIGHE

JAN: JOHN DOE POLICE OFFICERS

8. BRIEFLY DESCRIBE THE INJURIES, DAMAGES AND LOSSES INCURRED BY YOU.

NERVE DAMAGE TO RIGHT ARM, WRIST AND HAND

9. THE AMOUNT OF THE CLAIM. ONGOING TREATMENT

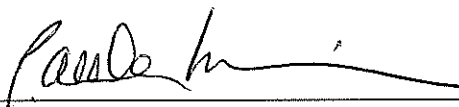
GIVE THE BASIS FOR THE CALCULATION OF THE ABOVE DAMAGES:

DOCTOR'S REPORT
HOSPITAL REPORT

I HEREBY CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY STATEMENT MADE HEREIN IS WILLFULLY FALSE OR FRAUDULENT, THAT I AM SUBJECT TO PUNISHMENT PROVIDED BY LAW.

5/18/20

DATE



CLAIMANT OR PERSON FILING ON BEHALF OF CLAIMANT

SUMMONS

Attorney(s) Gregg L. Zeff, Esquire, Eva C. Zelson
Office Address 100 Century Parkway, Suite 160
Town, State, Zip Code Mount Laurel, NJ 08054
Telephone Number (856)778-9700
Attorney(s) for Plaintiff _____
Jessica Peterson

Superior Court of New Jersey

Burlington County
Law Division

Docket No: BUR-L-001088-20

Plaintiff(s)

vs.

Evesham Township

Defendant(s)

CIVIL ACTION SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.njecourts.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.njecourts.gov/forms/10153_deptyclerklawref.pdf.

/s/Michelle Smith
Clerk of the Superior Court

DATED: 06/16/2020

Name of Defendant to Be Served: Evesham Township

Address of Defendant to Be Served: 984 Tuckerton Road, Evesham, NJ 08053

BURLINGTON COUNTY
SUPERIOR COURT
49 RANOCAS ROAD
MT HOLLY NJ 08060

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 288-9500
COURT HOURS 8:30 AM - 4:30 PM

DATE: JUNE 01, 2020
RE: PETERSON JESSICA VS EVESHAM TOWNSHIP
DOCKET: BUR L -001088 20

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 AIMEE R. BELGARD

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (609) 288-9500.

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: GREGG L. ZEFF
ZEFF LAW FIRM, LLC
100 CENTURY PKWY
STE160
MT LAUREL NJ 08054

ECOURTS

ZEFF LAW FIRM, LLC

Gregg L. Zeff, Esquire #042531988

Eva C. Zelson, Esquire #153832015

100 Century Parkway, Suite 160

Mount Laurel, NJ 08054

(856) 778-9700 (T)

(609) 534-0992 (F)

gzeff@glzefflaw.com

JESSICA PETERSON 209 Orchard Avenue <i>Somerdale</i> , NJ 08012 v. EVESHAM TOWNSHIP 984 Tuckerton Road Evesham, NJ 08053	<i>Plaintiff,</i> <i>Defendant..</i>	IN THE SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY DOCKET NO. BUR-L-001088-20 COMPLAINT JURY TRIAL DEMAND
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AMENDED COMPLAINT

Changes in bold italics

Jessica Peterson, (Plaintiff), by and through her attorneys the Zeff Law Firm, LLC, hereby brings this complaint against the Township of Evesham ("Defendant"), and in support thereof avers as follows:

THE PARTIES

1. Plaintiff Jessica Peterson is an adult woman residing at the above-listed address.
2. Defendant, Township of Evesham is a municipality operating under the laws of New Jersey. Defendant operates a Police Department.

JURISDICTION AND VENUE

3. Jurisdiction is properly laid in this Court as Defendant is subject to personal jurisdiction in the State of New Jersey.
4. Moreover, Plaintiff's cause of action arises out of Defendant's acts and/or omissions which occurred primarily in Burlington County, New Jersey.

STATEMENT OF FACTS

5. On April 6, 2019 Plaintiff was lawfully at the home of a former coworker, Dave Peterson ("Peterson"). Her vehicle, which was registered in her name, was *unoccupied and was lawfully parked in the street in front of Peterson's residence.*
6. At that time, Peterson was a police officer employed by Defendant.
7. On that day, Peterson had been ill and therefore took sick time from work. As a result of Peterson taking sick time, Lieutenant Siitonen of Defendant travelled to Peterson's home to perform a "sick check."
8. Lieutenant Siitonen knocked on Peterson's door, and Peterson answered. The two spoke briefly.
9. Based on that conversation, Lieutenant Siitonen had no reason to suspect that anything unusual or unlawful was occurring, and in fact did not suspect that anything unusual or unlawful was occurring.
10. Lieutenant Siitonen did not observe Plaintiff during this sick check, and had no reason to believe she was present.
11. On or around May 14, 2019, Peterson reported to work and immediately began to be harassed by coworkers regarding his romantic relationship with Plaintiff. The harassment included comments about Plaintiff's age, as well as her current and former jobs.
12. Through this harassment, Peterson learned that Lieutenant Siitonen had, after visiting Peterson's home for a sick check, impermissibly ran a full license plate lookup on Plaintiff's vehicle.
13. This license plate lookup allowed Lieutenant Siitonen and other employees of Defendant to learn personal information about Plaintiff, including her age, full name and social security number, as well as access a photograph of Plaintiff.
14. Plaintiff had a reasonable expectation of privacy in this personal information.
15. In the state of New Jersey, it is impermissible for an officer to run a full license plate lookup outside of a criminal investigation, because individuals maintain a privacy interest in the personal information revealed by such a lookup. Officers are permitted to run a limited license plate check to determine whether the vehicle was stolen or assigned to an individual with a suspended license. *Only if* illegal activity is recovered by this initial

search are officers permitted to run a full license plate lookup. *See State v Donis*, 157 N.J. 44 (1998).

16. A limited license plate check of Plaintiff's license plate did not reveal any illegal activity, and thus the full license plate lookup was impermissible.
17. It was known by Lieutenant Siitonen at the time he performed a full search of Plaintiff's license plate that doing so violates New Jersey Law.
18. Prior to April 6, 2019, Peterson had never disclosed any information to his coworkers regarding his relationship with Plaintiff.
19. Beginning on May 14, 2019, and continuing for weeks thereafter, employees of Defendant repeatedly harassed Peterson regarding his relationship with Plaintiff.
20. Peterson became aware that not only was information about his relationship spread throughout the department, but there was even a group chat among officers to discuss the relationship, and to discuss Plaintiff.
21. Employees within Defendant began spreading rumors that Peterson's marriage was ending due to his relationship with Plaintiff.
22. Further, employees within Defendant began to falsely claim that during the sick check on April 6, 2019, Plaintiff had answered Peterson's door wearing only a towel.
23. Plaintiff has complied with the notice requirements of the Tort Claims Act. N.J.S.A. 59:1-1 et seq.

COUNT ONE

VIOLATIONS OF THE NEW JERSEY STATE CONSTITUTION AND THE NEW JERSEY CIVIL RIGHTS ACT, N.J.S.A. § 10:6-2: FREEDOM FROM UNLAWFUL SEARCHES

24. Plaintiff incorporates by reference the preceding allegations of this as though each were set forth herein at length.
25. Defendant's actions set forth above have deprived Plaintiff of her right to be free from unreasonable searches and seizures under Article 1, paragraph 7 of the New Jersey Constitution.
26. As a direct and proximate result of these constitutional violations, Plaintiff suffered a deprivation of freedom, pain and suffering, mental anguish, loss of capacity for the enjoyment of life, and other damages.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages, punitive damages, attorney's fees, costs, fees, and all other appropriate relief.

COUNT TWO

NEW JERSEY TORT CLAIMS ACT NEGLIGENCE

27. Plaintiff incorporates by reference the preceding allegations of this as though each were set forth herein at length.
28. Defendant owed numerous duties to Plaintiff.
29. By its acts and omissions, Defendants violated the duty of care owed to Plaintiff. Defendant acted with gross negligence and/or recklessly.
30. By its acts and omissions, Defendant proximately caused permanent injuries to Plaintiff, including substantial emotional, developmental, psychological, and/or psychiatric harm.
31. Defendant's acts and omissions were a material element and/or a substantial factor in bringing harm to Plaintiff. The harms sustained by Plaintiff were reasonably foreseeable.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages, punitive damages, attorney's fees, costs, fees, and all other appropriate relief.

COUNT THREE

**VIOLATIONS OF THE NEW JERSEY STATE CONSTITUTION
AND THE NEW JERSEY CIVIL RIGHTS ACT, N.J.S.A. § 10:6-2
SUBSTANTIVE DUE PROCESS**

32. Plaintiff incorporates by reference the preceding allegations of this as though each were set forth herein at length.
33. Defendant's actions set forth above have deprived Plaintiff of her rights to procedural and substantive due process under Article I, paragraph 1 of the New Jersey Constitution, including, but not limited to, her rights to liberty, safety and happiness.
34. Defendant also denied Plaintiff her right to be free from unreasonable searches and seizures under Article 1, paragraph 7 of the New Jersey Constitution.
35. As a direct and proximate result of these constitutional violations, Plaintiff suffered a deprivation of freedom, pain and suffering, mental anguish, loss of capacity for the enjoyment of life, and other damages.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages, punitive damages, attorney's fees, costs, fees, and all other appropriate relief.

COUNT FOUR

NEW JERSEY CIVIL RIGHTS ACT N.J.S.A. 10:6-2

FAILURE TO TRAIN

36. Plaintiff incorporates by reference the preceding allegations of this as though each were set forth herein at length.
37. Defendant developed and maintained a number of deficient policies, practices, and/or customs regarding unreasonable searches, among other things, which caused the deprivation of Plaintiff's constitutional rights.
38. Defendant failed to properly train its employees regarding these deficient policies, practices, and/customs regarding how and when to perform proper searches.
39. Defendant's policies and customs encouraged officers to believe they could violate the constitutional rights of civilians with impunity and with the explicit or tacit approval of the Defendant.
40. As a direct and proximate result of the aforementioned acts and omissions of the Defendants' substantial emotional, developmental, psychological, and/or psychiatric harm was caused to Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages, punitive damages, attorney's fees, costs, fees, and all other appropriate relief.

COUNT FIVE

INVASION OF PRIVACY: INTRUSION ON SECLUSION

41. Plaintiff repeats and re-alleges each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.
42. Plaintiff had a reasonable expectation of privacy in the personal information revealed by the license plate check.
43. Defendant, without justification or permission, accessed Plaintiff's personal information. This unauthorized access was unreasonable and highly offensive to a reasonable person.
44. Plaintiff suffered damages as a result of Defendant's invasion of her privacy.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages, punitive damages, attorney's fees, costs, fees, and all other appropriate relief.

COUNT SIX

PUBLICATION OF PRIVATE FACTS

45. Plaintiff repeats and re-alleges each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.
46. Plaintiff had a reasonable expectation of privacy in the personal information revealed by the license plate check.
47. Further, the impermissible access of the information revealed the private fact of Plaintiff's relationship with Peterson.
48. The dissemination of this fact would have been offensive to a reasonable person.
49. Defendant, without justification or permission, revealed private facts about Plaintiff, thus causing Plaintiff to suffer damages.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages, punitive damages, attorney's fees, costs, fees, and all other appropriate relief.

ZEFF LAW FIRM, LLC

/s/Gregg L. Zeff, Esq.
Gregg L. Zeff, Esquire
Eva C. Zelson, Esquire
Attorneys for Plaintiff

Dated: *June 5*, 2020

JURY DEMAND AND TRIAL COUNSEL DESIGNATION

Please take notice that Plaintiff hereby demands a trial by jury as to all issues and that pursuant to rule 4:25-4, Gregg L. Zeff, Esquire, is hereby designated as trial counsel in the above captioned matter on behalf of The Zeff Law Firm, LLC.

CERTIFICATIONS

I Certify pursuant to Rule 4:5-1 that I know of no other proceedings pending or that are contemplating in any court or arbitration proceeding that concerns this subject matter and know of no other parties that need be joined with action.

ZEFF LAW FIRM, LLC

/s/Gregg L. Zeff, Esq.
Gregg L. Zeff, Esquire
Eva C. Zelson, Esquire
Attorneys for Plaintiff

Dated: *June 5, 2020*