

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RICK TADDIO,
Plaintiff

V.

SUMMONS IN A CIVIL CASE

HOLMDEL TOWNSHIP, ET AL.,
Defendant

CASE
NUMBER: **3:17-CV-06263-FLW-TJB**

TO: *(Name and address of Defendant):*

Michael J. Dowens
Holmdel Township
4 Crawford's Corner
Holmdel, NJ 07733-0410

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

WILLIAM T. WALSH

CLERK

John Moller

(By) DEPUTY CLERK



ISSUED ON 2017-08-18 14:51:44, Clerk
USDC NJD

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

_____	:	
RICK TADDIO,	:	
	:	
Plaintiff,	:	
	:	
Vs.,	:	COMPLAINT, JURY DEMAND AND
	:	DESIGNATION OF TRIAL COUNSEL
	:	
HOLMDEL TOWNSHIP and	:	
MICHAEL J. DOWENS,	:	
	:	
Defendants,	:	
_____	:	

Plaintiff, Rick Taddio, presently residing at 12 Raintree Court, Holmdel, New Jersey, by way of complaint against the Defendants, says:

FIRST COUNT

1. This Court has subject matter jurisdiction over Plaintiff's claims pursuant to 42 United States Code section 1983.

2. On August 21, 2015, Defendant, Michael J. Dowens, was employed by the Holmdel Township Police Department, and was on duty at the time of the incident being complained of by the Plaintiff.

3. On the above date, the Defendant, Michael J. Dowens, was one of several police officers who appeared at the Plaintiff's residence.

4. Defendant, Michael J. Dowens, used excessive force causing a severe and permanent injury to the Plaintiff.

5. As a result, the Plaintiff was caused to undergo medical treatments, was caused great pain and suffering, was caused to incur expense for his medical treatments and has been left with a permanent injury that will continue to cause him great pain and suffering.

WHEREFORE, Plaintiff demands judgment against Defendant, Michael J. Dowens, for compensatory and punitive damages together with interest, counsel fees and costs of suit.

SECOND COUNT

1. Plaintiff repeats and realleges all of the facts of the First Count as if fully set forth herein at length.

2. Defendant, Holmdel Township, failed to properly train and supervise Defendant, Michael J. Dowens.

3. As a result, , the Plaintiff was caused to undergo medical treatments, was caused great pain and suffering, was caused to incur expense for his medical treatments, was unable to perform his routine duties and work duties, and has been left with a permanent injury that will continue to cause him great pain and suffering.

WHEREFORE, Plaintiff demands judgment against Defendant, Holmdel Township, together with interest, counsel fees and costs of suit.

JURY DEMAND

Plaintiff requests a trial by jury on each count.

DESIGNATION OF TRIAL COUNSEL

Robert J. Jeney, Jr. is hereby designated as trial counsel.

JENEY, JENEY & O'CONNOR

Dated: August 18, 2017

By: _____
/S/ ROBERT J. JENEY, JR.
e-mail: rjjeney@comcast.net
N.J. Bar No. 030691984