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LAW OFFICE OF
GARY J. NATALE, P.C.
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Gary J. Natale, Esq.: 014931990
111 Northfield Avenue, Suite 300
West Orange, New Jersey 07052
(973) 324-9711 (office)
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E-Mail: Lawyers@natalelaw.com
Attorneys for Plaintiff:
PAOLA R. MARTINEZ

PAOLA R. MARTINEZ,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION; CIVIL PART
	:	
Plaintiff(s),	:	ESSEX COUNTY
	:	
-vs-	:	DOCKET NO.: Esx-L-6931-17
	:	
	:	
CITY OF ORANGE, ABC	:	CIVIL ACTION
CORPORATION, 2-5 (fictitious	:	
names), CITY OF ORANGE	:	
POLICE DEPARTMENT, ABC	:	
CORPORATION 6-9 (fictitious	:	
names), CITY OF ORANGE POLICE	:	
OFFICER ROBERT POLHILL, POLICE:	:	
OFFICER TISDALE DICKSON, LT.	:	SUMMONS
EASON and JOHN DOES 2-5	:	
(fictitious names),	:	
	:	
	:	
Defendant(s).	:	
	:	

THE STATE OF NEW JERSEY
TO THE ABOVE NAMED DEFENDANT(S): CITY OF ORANGE POLICE
LIEUTENANT EASON

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.) 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.

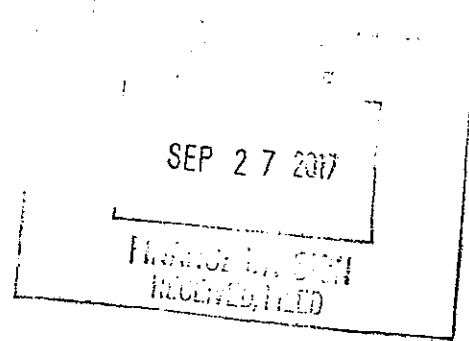
Dated: October 27, 2017

s/s Michelle M. Smith
Michelle M. Smith
Clerk of the Superior Court

Name of defendant to be served: City of Orange Police
Lieutenant Eason

Address for Service: 29 Park Street
Orange, New Jersey 07050

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Attorneys for Plaintiff:
PAOLA R. MARTINEZ



PAOLA R. MARTINEZ,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION; CIVIL PART
	:	
Plaintiff(s),	:	ESSEX COUNTY
	:	
-vs-	:	DOCKET NO.: ESX L-6931-17
	:	
	:	
CITY OF ORANGE, ABC	:	CIVIL ACTION
CORPORATION, 2-5 (fictitious	:	
names), CITY OF ORANGE	:	
POLICE DEPARTMENT, ABC	:	
CORPORATION 6-9 (fictitious	:	
names), CITY OF ORANGE POLICE:	:	
OFFICER ROBERT POLHILL, POLICE:	:	COMPLAINT AND JURY DEMAND
OFFICER TISDALE DICKSON, LT.	:	
EASON and JOHN DOES 2-5	:	
(fictitious names),	:	
	:	
	:	
Defendant(s).	:	
	:	

*The Plaintiff, PAOLA R. MARTINEZ, residing at 24 Moore Terrace,
in the Township of West Orange, County of Essex and State of New
Jersey, by way of complaint against the Defendant(s), says:*

FIRST COUNT

**SURVIVOR'S ACTION AGAINST DEFENDANT(S), CITY OF ORANGE, CITY OF
ORANGE POLICE DEPARTMENT, CITY OF ORANGE POLICE OFFICER ROBERT**

POLHILL, POLICE OFFICER TISDALE-DICKSON, LT. EASTON, ABC CORPORATION
2-5 (fictitious names), ABC CORPORATION 6-9 (fictitious names), and
JOHN DOES 2-5 (fictitious names)

1. On or about September 27, 2015 at approximately 11:00 a.m. the Plaintiff, PAOLA R. MARTINEZ, was lawfully on the premises commonly known and designated as 300 Watchung Avenue, City of Orange, County of Essex and State of New Jersey outside of the front door of apartment number 8.

2. At all dates and times material hereto, the Plaintiff, PAOLA R. MARTINEZ, was an individual residing at 24 Moore Terrace, in the Township of West Orange, County of Essex, and State of New Jersey 07052.

3. At all dates and times material hereto, the Defendant, CITY OF ORANGE, was a municipal corporation organized under the laws of the State of New Jersey with its offices located in the City of Orange, City Hall, 29 North Day Street, County of Essex and State of New Jersey 07050.

4. At all dates and times material hereto, the Defendant, CITY OF ORANGE POLICE DEPARTMENT, was an agency of the City of Orange with its offices located at 29 Park Street, City of Orange, New Jersey 07050.

5. All dates and times material hereto, OFFICER ROBERT POLHILL was an employee of the City of Orange Police Department.

6. All dates and times material hereto, OFFICER TISDALE-DICKSON was an employee of the City of Orange Police Department.

7. At all dates and times material hereto, LT. EASON was an

employee of the City of Orange Police Department.

8. At all dates and times material hereto, at the aforesaid time and place, Defendant(s), ROBERT POLHILL, TISDALE-DICKSON, and LT. EASON were all police officers for the Defendant(s), CITY OF ORANGE and CITY OF ORANGE POLICE DEPARTMENT.

9. All dates and times material hereto, at the aforesaid time and place, Defendant(s), ROBERT POLHILL, TISDALE-DICKSON, and LT. EASON, were all agents, servants, and/or employees serving the Defendant(s), CITY OF ORANGE and CITY OF ORANGE POLICE DEPARTMENT.

10. On said date, time and place, Defendant(s), ROBERT POLHILL, TISDALE-DICKSON, and LT. EASON, performed their respective duties and responsibilities as City of Orange Police Officers in a reckless, careless and negligent manner by using unreasonable and excessive force against the person of PAOLA R. MARTINEZ.

11. On said date and time the Plaintiff, PAOLA R. MARTINEZ, was pregnant.

12. On said date, time and place, despite the Plaintiff, PAOLA R. MARTINEZ, telling the aforesaid Defendant(s), CITY OF ORANGE POLICE OFFICERS on the scene, that the Plaintiff was pregnant, the CITY OF ORANGE POLICE OFFICERS, herein named above, used unnecessary and excessive force in grabbing the Plaintiff, PAOLA R. MARTINEZ, and throwing the Plaintiff against a wall with such force as to cause the Plaintiff to fall to the ground with the Two (2) very large officers falling on top of the Plaintiff. Also, while on the ground the officers continued to use excessive force resulting in the plaintiff

suffering a miscarriage.

13. On said dates and times material hereto, en route to the City of Orange Police Station, the Plaintiff, PAOLA R. MARTINEZ, informed the woman police officer that she was cramping and suffering very sharp abdominal pains which prompted said City of Orange Police Officer to close the dividing police car window between the front and back seats of said City of Orange police motor vehicle in order not to hear the Plaintiff's complaints of pain and discomfort.

14. On said date and times, despite the cramping and very sharp abdominal pains which the Plaintiff, PAOLA R. MARTINEZ, was suffering from, the City of Orange police officers named herein above cuffed the Plaintiff's hands very tightly behind her back. It then took said City of Orange police officers at the City of Orange police station between Thirty (30) minutes to One (1) hour to call for medical assistance for the Plaintiff.

15. As a direct and proximate result of the reckless actions, negligence, carelessness and unreasonable use of excessive force against the person of the Plaintiff, PAOLA R. MARTINEZ, as well as the delay in providing medical attention to the plaintiff, the plaintiff suffered serious bodily injuries causing the plaintiff to suffer a miscarriage.

16. Due to the wrongful conduct of the Defendant(s), named herein, the Plaintiff has suffered a loss of fetus, serious bodily injury, pain, mental anguish and depression.

17. Plaintiff, PAOLA R. MARTINEZ, brings a survival action for the benefit of her loss of fetus (miscarriage) estate pursuant to

N.J.S.A.2A:15-3.

W H E R E F O R E, Plaintiff, PAOLA R. MARTINEZ, demands judgment against the Defendant(s), jointly and severely, for compensatory damages, including hedonic damages, punitive damages, and costs of suit.

SECOND COUNT

WRONGFUL DEATH ACTION AGAINST DEFENDANT(S), CITY OF ORANGE, CITY OF
ORANGE POLICE DEPARTMENT, CITY OF ORANGE POLICE OFFICER ROBERT
POLHILL, POLICE OFFICER TISDALE-DICKSON, LT. EASON, ABC CORPORATION 2-
5 (fictitious names), ABC CORPORATION 6-9 (fictitious names), and JOHN
DOES 2-5 (fictitious names)

1. Plaintiff, PAOLA R. MARTINEZ, repeats and reiterates each and every allegation contained in the FIRST COUNT herein and makes the same a part hereof by reference thereto.

2. As a direct and proximate result of the recklessness, negligence and/or carelessness of the Defendant(s) by using unreasonable and unnecessary excessive use of force against the person of the Plaintiff, as stated herein under the First Count, the Plaintiff has suffered a loss of fetus, mental anguish, depression and serious personal injuries.

3. By reason of said loss of fetus, the unborn child's survivors have been deprived of the unborn child's support, comfort, society, counsel and services, and they have thereby suffered pecuniary losses. In addition, the survivors have incurred hospital

and medical expenses for which said Defendant(s) are also liable.

4. Plaintiff, PAOLA R. MARTINEZ, brings this wrongful death action for the benefit of the unborn child's survivors pursuant to N.J.S.A. 2A:31-1 et seq.

W H E R E F O R E, Plaintiff demands judgment against the Defendant(s), here in named, jointly and severely, for compensatory damages, including hedonic damages and costs of suit.

THIRD COUNT

RECKELESSNESS, NEGLIGENCE, CARELESS, UNREASONABLE AND UNNECESSARY USE
OF EXCESSIVE FORCE AGAINST THE PERSON OF THE PLAINTIFF BY
DEFENDANT(S), CITY OF ORANGE, CITY OF ORANGE POLICE DEPARTMENT, CITY
OF ORANGE POLICE OFFICER ROBERT POLHILL, POLICE OFFICER TISDALE-
DICKSON, LT. EASON, ABC CORPORATION 2-5 (fictitious names), ABC
CORPORATION 6-9 (fictitious names), and JOHN DOES 2-5 (fictitious
names)

1. Plaintiff, PAOLA R. MARTINEZ, repeats and reiterates each and every allegation contained in the First and Second Counts herein and makes the same a part hereof by reference thereto.

2. As a direct and proximate result of the recklessness, negligence and/or carelessness of the Defendant(s), named herein above, by using unreasonable and unnecessary excessive use of force against the person of the Plaintiff, PAOLA A. MARTINEZ, as stated herein above in the First and Second Counts, the Plaintiff has suffered a loss of fetus (miscarriage), pain and suffering, serious

personal injury, mental anguish and depression.

3. Defendant(s), named herein above, failed to exercise reasonable and due care under the circumstances, as stated herein under the First and Second Counts.

W H E R E F O R E, Plaintiff demands judgment against the Defendant(s) named herein, jointly and severally, for compensatory damages, punitive damages, costs of suits, and attorney fees.

FOURTH COUNT

VIOLATION OF THE PLAINTIFF'S FOURTH AND FOURTEENTH AMENDMENT FEDERAL
AND STATE CONSTITUTIONAL RIGHTS BY THE DEFENDANT(S), NAMED HEREIN, FOR
UNREASONABLE EXCESSIVE USE OF FORCE AGAINST THE PERSON OF THE
PLAINTIFF

1. Plaintiff, PAOLA R. MARTINEZ, repeats and reiterates each and every allegation contained in the First through Third counts herein and makes the same a part hereof by reference thereto.

2. This is an action by the Plaintiff for the Defendant(s) breach of the Plaintiff's Fourth and Fourteenth Amendment Constitution federal and state protected rights to be free from unlawful and unreasonable excessive use of force by police officers against the person of the Plaintiff as fully stated under the First through Third Counts stated herein.

3. As a direct and proximate result of the Defendant(s) violation of the Plaintiff's 4th and 14th Amendment constitutional rights the Plaintiff sustained serious personal injury causing her to

suffer a loss of fetus, mental anguish and depression.

W H E R E F O R E, the Plaintiff demands judgment against the Defendant(s) named herein, jointly and severally, for compensatory damages, punitive damages, costs of suits, and attorney fees.

FIFTH COUNTY

SURVIVOR - CIVIL RIGHTS

1. Plaintiff repeats and realleges the allegations of the foregoing paragraphs as if set forth at length herein.

2. Defendants' incarceration of the Plaintiff and refusal to grant the Plaintiff's reasonable request for permission to obtain necessary medical treatment violated the Plaintiff's constitutional rights under the United States Constitution, 42 U.S.C. 1983 and 1986, et seq., the New Jersey Constitution, and its laws and statutes.

3. As a direct and proximate result of the foregoing, the Plaintiff suffered extreme pain, suffering, and a miscarriage.

4. The Plaintiff is entitled to recover compensation for the personal injuries and civil rights violations suffered by the Plaintiff.

W H E R E F O R E, Plaintiff hereby demands judgment against Defendants, jointly and severely, for damages, interest, punitive damages, attorney's fees, costs of suit, and such other and further relief as the court deems equitable and just.

SIXTH COUNT

WRONGFUL DEATH - CIVIL RIGHTS

1. Plaintiff repeats and realleges the allegations of the foregoing paragraphs as if set forth at length herein.

2. At all times mentioned herein, it was the custom, policy, and practice of Defendant(s), named herein, to unreasonably deny medical treatment and threaten incarceration under the aforementioned circumstances, which resulted in a violation of the Plaintiff's constitutional rights under the United States Constitution, 42 U.S.C. 1983 and 1986, et seq., the New Jersey Constitution, and its laws and statutes.

3. As a direct and proximate result of the foregoing, the Plaintiff suffered extreme pain and suffering and a miscarriage.

4. Plaintiff is entitled to recover for the pecuniary loss occasioned to the Plaintiff's survivors as a result of her loss of fetus.

W H E R E F O R E, Plaintiff hereby demands judgment against Defendant(s), jointly and severely, for damages, interest, punitive damages, attorney's fees, costs of suit, and such other and further relief as the court deems equitable and just.

SEVENTH COUNT

EXCESSIVE USE OF FORCE

1. Plaintiff, PAOLA R. MARTINEZ, repeats and reiterates each

and every allegation contained in the First through Sixth Counts herein and makes the same a part hereof by reference.

2. At all relevant times herein Plaintiff, PAOLA R. MARTINEZ, was lawfully on the premises known as 300 Watchung Avenue, City of Orange, County of Essex and State of New Jersey.

3. At all relevant times herein the Defendant, CITY OF ORANGE, was and still is a municipal entity organized and existing pursuant to the laws of the State of New Jersey, with a place of business at 29 North Day Street, County of Essex and State of New Jersey.

4. At all relevant times herein, upon information and belief, Defendant, POLICE OFFICER ROBERT POLHILL, is a police officer employed by the Defendant(s), CITY OF ORANGE and the ORANGE POLICE DEPARTMENT, acting in his official capacity as a police officer under color of law.

5. At all relevant times herein upon information and belief Defendant, POLICE OFFICER TISDALE-DICKSON, was a police officer employed by the Defendant(s), CITY OF ORANGE and the ORANGE POLICE DEPARTMENT, acting in her official capacity as a police officer under color of law.

6. All relevant times herein, upon information and belief, Defendant, LT. EASON, was employed by the CITY OF ORANGE POLICE DEPARTMENT and responsible for the supervision and oversight of the Department, including the development, promulgation, and implementation of policies, procedures and standards for the police department and more specifically policies, procedures and standards relating to the use of force, arrest procedures, internal affairs

investigations, discipline and overall conduct of police officers.

7. At all relevant times herein Defendant(s), ABC CORPORATION 2-5, were as yet unidentified departments, agencies or subdivisions of the CITY OF ORANGE, ORANGE POLICE DEPARTMENT, and/or municipal entities responsible for supervision, management and control over Defendant police officers and others.

8. At all relevant times herein Defendant(s), JOHN DOES 2-5 (as yet unidentified individuals), were duly appointed police officers and/or supervisors of Defendant(s), CITY OF ORANGE and the ORANGE POLICE DEPARTMENT.

9. On September 27, 2015 Plaintiff, PAOLA R. MARTINEZ, was subject to the unlawful use of excessive and unnecessary force by Defendant officers and JOHN DOES 2-5 without justification or cause as fully described herein under the First County herein above.

10. On September 27, 2015 and continuing, Plaintiff, PAOLA R. MARTINEZ, was subjected to unlawful emotional distress without justification or cause.

11. Plaintiff, PAOLA R. MARTINEZ, was caused to suffer severe and permanent injuries and suffered a miscarriage by reason of the assault and use of unlawful force by Defendant officers.

12. Plaintiff, PAOLA R. MARTINEZ, institutes this action for compensatory and punitive damages arising out of the unlawful actions and conduct of the Defendant(s), named herein, who acting under color of state law and under authority, custom and usage of the Defendant(s), CITY OF ORANGE, and ORANGE POLICE DEPARTMENT, violated the civil rights of Plaintiff protected by and secured under the

provisions of the First, Fourth, Fifth, Sixth, Eighth, Ninth, and Fourteenth amendments to the United States Constitution and under the laws of the United States, particularly under the Civil Rights Act, Title 42 of the United States Code, Section 1983.

13. All relevant times herein, Defendant(s) were acting under color of state law and within the scope of their authority as employees and/or officers of Defendant(s), CITY OF ORANGE and ORANGE POLICE DEPARTMENT.

14. As a direct and proximate result of the aforesaid occurrence and use of excessive force Plaintiff suffered serious, severe and permanent injuries to her body, including a miscarriage.

15. The use of force used was far in excess of what was necessary in this matter.

16. The conduct of that Defendant officers constituted an abuse of process which deprived Plaintiff of her liberty and the rights, privileges and immunities granted to her under the Constitution.

17. At all relevant times herein, Defendant(s), officers named herein, were acting under color of state law and within the scope of their authority as employees, agents and/or officers of Defendant(s) CITY OF ORANGE and the ORANGE POLICE DEPARTMENT.

18. During all relevant times herein the Defendant(s), CITY OF ORANGE and ORANGE POLICE DEPARTMENT and ORANGE POLICE officers here in named, their agents servants, and/or employees acted under color of law, under the color of the Constitution, statutes, laws, charter, ordinances, rules, regulations, customs, usages, and practices of the said police departments, agencies and entities.

19. During all relevant times Defendant(s), CITY OF ORANGE and ORANGE POLICE DEPARTMENT ratified and maintained a practice, custom and/or policy of failing to train, discipline and/or supervise Defendant officers in conformity with clearly established constitutional principles which govern their conduct, including proscriptions against the use of excessive force in effecting seizures of unarmed persons.

20. During all relevant times herein the Defendant(s), CITY OF ORANGE and ORANGE POLICE DEPARTMENT, were responsible for the conduct of said officers as well as instruction, supervision and implementation of proper law enforcement procedures and oversight over the ORANGE POLICE DEPARTMENT.

21. At all relevant times herein the Defendant(s) acted with deliberate and conscience indifferences to Plaintiff's constitutional rights which violations arise out of a pattern of custom, policy and practice by and of Defendant(s), CITY OF ORANGE and ORANGE POLICE DEPARTMENT, in allowing the use of excessive force, permitting and condoning the use of excessive force in violation of police procedures as well as the failure to properly hire, train and supervise police officers in the proper conduct of their duties and in the use of force.

22. By reason of the foregoing unlawful and excessive use of force, Defendant(s) CITY OF ORANGE, ORANGE POLICE DEPARTMENT, and CITY OF ORANGE POLICE OFFICERS named herein, through and by the acts of the individual police officers willfully, wantonly, and recklessly violated the civil rights of Plaintiff.

23. The foregoing acts of assault and excessive force, violated Plaintiff's rights under the Fourth Amendment to be secure in her person from unreasonable seizures, and deprived Plaintiff of her rights, privileges and immunities secured by the Constitution and laws of the United States.

24. The foregoing acts of assault and excessive force, violated Plaintiff's right under the First, Fifth and Fourteenth Amendments to due process, equal protection and her rights of privacy and deprived Plaintiff of her rights, privileges and immunities secured by the Constitution and laws of the United States.

25. The foregoing acts of assault and excessive force, violated Plaintiff's right under the Eighth Amendment to be free of cruel and unusual punishment and deprived Plaintiff of her rights, privileges and immunities secured by the Constitution and laws of the United States.

26. Defendant(s), CITY OF ORANGE, ORANGE POLICE DEPARTMENT, and POLICE OFFICERS named herein, their agents, servants and/or employees by reason of their acts, omissions, deliberate and conscious indifference to the rights of Plaintiff, failure and refusal to properly supervise or otherwise correct improper conduct, in allowing and permitting a pattern of improper violation of police procedures and protocol to persist, failure to properly hire, train and supervise law enforcement officers, and permitting a pattern of abuse to continue, deprived Plaintiff of her rights, privileges and immunities secured by the Constitution and laws of the United States, and are liable to Plaintiff pursuant to Title 42 Section 1983 of the United

States Code and under state law.

27. The aforescribed acts of Defendant police officers were committed under color of law and within their authority as police officers and employees of the CITY OF ORANGE and ORANGE POLICE DEPARTMENT and were acting within the scope of their employment and pursuant to the authority vested in them by said Defendants.

28. Defendant(s), CITY OF ORANGE, ORANGE POLICE DEPARTMENT and POLICE OFFICERS named herein, deprived Plaintiff her constitutional rights, acting under color of statute, ordinance, regulation, custom or usage and misused the power they possessed.

29. As a direct and proximate result of the practices, customs and usages of the Defendant(s), CITY OF ORANGE and ORANGE POLICE DEPARTMENT, Plaintiff was deprived of her right to due process of law guaranteed under the First, Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the Constitution of the United States.

30. A direct and proximate result of the violation of constitutional rights as aforescribed, Plaintiff was caused to suffer severe, painful and permanent personal injuries, a miscarriage, mental anguish and great physical pain, was compelled to undergo hospital and medical aid and treatment and was prevented from engaging in her usual activities, all to her damage.

31. By reason of the foregoing Plaintiff has been damaged.

W H E R E F O R E, Plaintiff, PAOLA R. MARTINEZ, demands judgment against Defendant(s) named herein, jointly and severally, for compensatory and punitive damages together with interest, costs of suit and attorneys fees.

JURY DEMAND

Plaintiff demands a trial by jury on all counts in this complaint.

DESIGNATION OF TRIAL COUNSEL

GARY J. NATALE, ESQ. is hereby designated as trial counsel for the Plaintiff in the within matter.

CERTIFICATION OF COUNSEL

1. Pursuant to Rule 4:5-1, the undersigned hereby certifies that at the time of filing this complaint, the matter in controversy is not the subject of any other action pending in any court and/or arbitration proceeding.

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

DEMAND FOR INSURANCE INFORMATION

PLEASE TAKE NOTICE that pursuant to Rule 4:10-2(b), Plaintiff hereby demands production of a copy of any and all insurance agreements under which Defendants may be covered to satisfy part or

all the judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

DEMAND FOR PRODUCTION OF DOCUMENTS

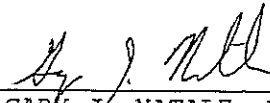
PLEASE TAKE NOTICE that pursuant to Rule 4:18-1 Plaintiff demands the production for purposes of inspection and copying at the offices of Gary J. Natale, P.C., 111 Northfield Avenue, Suite 300, West Orange, New Jersey 07052 within Forty-Five (45) days after service of the within pleadings of the following items pertaining to the allegations of this Complaint:

1. All certificates of insurance and insurance policies pertaining to claims for bodily injuries due to the liability of the Defendant(s);
2. All statements in the possession of the Defendants or their insurance carrier provided by eyewitnesses to the incident set forth in the Complaint;
3. All photographs of the incident which is the subject matter of this Complaint, in the possession of the Defendants or their insurance carrier;

DEMAND FOR ANSWERS TO FORM C AND C1 UNIFORM INTERROGATORIES AND
SUPPLEMENTAL INTERROGATORIES

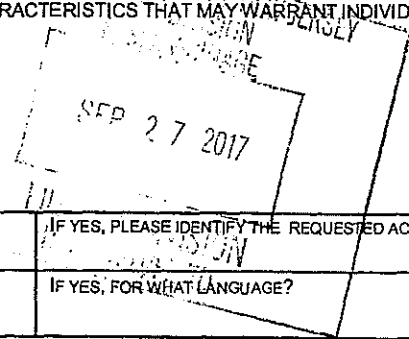
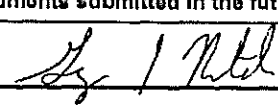
PLEASE TAKE NOTICE that pursuant to R.4:17-1(b)(ii) Plaintiff demand certified answers to Form C and C(1) of the Uniform

Interrogatories set forth in Appendix to the Rules Governing Civil Practice.

BY: 
GARY J. NATALE, ESQ.
Attorney for the Plaintiff(s)

DATED: September 27, 2017

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY PAYMENT TYPE: ☐ CK ☐ CG ☐ CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:	
	ATTORNEY / PRO SE NAME Gary J. Natale, Esq.		TELEPHONE NUMBER (973) 324-9711	
	COUNTY OF VENUE Essex		DOCKET NUMBER (when available) ESX 6631-17	
	FIRM NAME (if applicable) Law Office of Gary J. Natale, P.C.		DOCUMENT TYPE Complaint	
OFFICE ADDRESS 111 Northfield Avenue, Suite 300 West Orange, New Jersey 07052		JURY DEMAND ☒ Yes ☐ No		
NAME OF PARTY (e.g., John Doe, Plaintiff) Paola R. Martinez		CAPTION Paola R. Martinez vs. City of Orange, et al,		
CASE TYPE NUMBER (See reverse side for listing) 005 & 699	HURRICANE SANDY RELATED? ☐ YES ☒ NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? ☐ Yes ☒ No		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? ☐ Yes ☒ No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) ☐ NONE ☒ UNKNOWN		
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 ☒ No		IF YES, IS THAT RELATIONSHIP: ☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) ☐ FAMILIAL ☐ BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? ☐ Yes ☐ 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? ☐ Yes ☒ No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? ☐ Yes ☒ 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 <i>Rule</i> 1:38-7(b).				
ATTORNEY SIGNATURE: 				



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | 624 STRYKER LFIT CoCr V40 FEMORAL HEADS |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☒ Title 59

ESSEX COUNTY - CIVIL DIVISION
SUPERIOR COURT OF NJ
465 MARTIN LUTHER KING JR BLVD
NEWARK NJ 07102

COURT TELEPHONE NO. (973) 776-9300
COURT HOURS 8:30 AM - 4:30 PM

TRACK ASSIGNMENT NOTICE

DATE: SEPTEMBER 28, 2017
RE: MARTINEZ VS CITY OF ORANGE
DOCKET: ESX L -006931 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON PATRICK J. BARTELS

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (973) 776-9300.

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: GARY J. NATALE
GARY J. NATALE, PC
111 NORTHFIELD AVENUE SUITE 300
WEST ORANGE NJ 07052

JUGHAM2