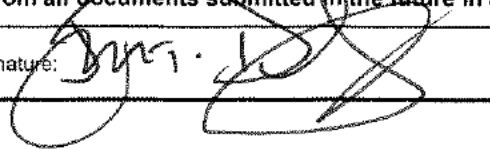


Appendix XII-B1

	Civil Case Information Statement (CIS)		For Use by Clerk's Office Only	
	Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		Payment type: ☐ ck ☐ cg ☐ ca Chg/Ck Number: _____ Amount: _____ Overpayment: _____ Batch Number: _____	
	Attorney/Pro Se Name Joseph T. Delgado, Esq.		Telephone Number 908-769-3344	
	Firm Name (if applicable) Garces, Grabler & LeBrocq, P.C.		County of Venue Middlesex 	
	Office Address 415 Watchung Avenue Plainfield, New Jersey 07060		Docket Number (when available) Document Type Complaint Jury Demand ☒ Yes ☐ No	
Name of Party (e.g., John Doe, Plaintiff) Claudia Patterson, as General Administratrix and as Administratrix Prosequendum of the Estate of		Caption Claudia Patterson, as General Administratrix and as Administratrix Prosequendum of the Estate of Kenneth J. Patterson vs. THETA DELTA CHI, ET ALS		
Case Type Number (See reverse side for listing) 605		Is this a professional malpractice case? ☒ Yes ☐ No If you have checked "Yes," see N.J.S.A. 2A:53A-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) UNKNOWN ☐ 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 1:38-7(b)</i> .				
Attorney Signature: 				

Side 2



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 | 297 MIRENA CONTRACEPTIVE DEVICE |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 300 TALC-BASED BODY POWDERS |
| 282 FOSAMAX | 601 ASBESTOS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 623 PROPECIA |
| 286 LEVAQUIN | 624 STRYKER LFIT CoCr V40 FEMORAL HEADS |
| 289 REGLAN | 625 FIREFIGHTER HEARING LOSS LITIGATION |
| 291 PELVIC MESH/GYNECARE | 626 ABILIFY |
| 292 PELVIC MESH/BARD | 627 PHYSIOMESH FLEXIBLE COMPOSITE MESH |
| 293 DEPUY ASR HIP IMPLANT LITIGATION | 628 TAXOTERE/DOCETAXEL |
| 295 ALLODERM REGENERATIVE TISSUE MATRIX | 629 ZOSTAVAX |
| 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS | 630 PROCEED MESH/PATCH |

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

Joseph T. Delgado, Esq.
NJ Attorney ID #: 030251982
GARCES, GRABLER & LEBROCQ., P.C.
415 Watching Avenue
Plainfield, New Jersey 07060
(908) 368-8004
Attorneys for Plaintiff
Our File No: 294667

CLAUDIA PATTERSON, AS GENERAL
ADMINISTRATRIX AND AS
ADMINISTRATRIX PROSEQUENDUM OF
THE ESTATE OF KENNETH J.
PATTERSON

Plaintiff,

v.

THETA DELTA CHI local chapter,
THETA DELTA CHI INTERNATIONAL
FRATERNITY, RUTGERS STATE
UNIVERSITY, RUTGERS UNIVERSITY
POLICE DEPARTMENT, A.B.C.
COMPANIES (1-100) (fictitious
entities) and JOHN DOES (1-100)
(fictitious names)

Defendants,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MIDDLESEX COUNTY

DOCKET NO.:

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, CLAUDIA PATTERSON, AS GENERAL ADMINISTRATRIX AND
AS ADMINISTRATRIX PROSEQUENDUM OF THE ESTATE OF KENNETH J.
PATTERSON, by way of Complaint against Defendants, hereby
states:

FIRST COUNT

1. At all times relevant hereto, Plaintiff, CLAUDIA PATTERSON, AS GENERAL ADMINISTRATRIX AND AS ADMINISTRATRIX PROSEQUENDUM OF THE ESTATE OF KENNETH J. PATTERSON ("THE ESTATE"), resided at Privacy Redaction
Privacy Redaction
2. At all times relevant hereto, Decedent, KENNETH J. PATTERSON, resided at Privacy Redaction
Privacy Redaction
3. At all times relevant hereto, Plaintiff, CLAUDIA PATTERSON, is the mother of Decedent, KENNETH J. PATTERSON, and has been appointed the General Administrator of the Estate of Kenneth J. Patterson, her natural son.
4. At all times relevant hereto, Defendant, THETA DELTA CHI ("TDX"), a local fraternity chapter at Rutgers State University, identified as the Lambda Triton charge of the Theta Delta Chi International Fraternity, upon information and belief, is located at 96 Huntington Street, in the City of New Brunswick, County of Middlesex, and State of New

Jersey.

5. At all times relevant hereto, Defendant, THETA DELTA CHI INTERNATIONAL FRATERNITY ("TDX INTERNATIONAL"), is a corporation with its corporate headquarters located at 214 Lewis Wharf, in the City of Boston, and Commonwealth of Massachusetts.
6. At all times relevant hereto, Defendant, RUTGERS STATE UNIVERSITY, is an entity existing under the laws of the State of New Jersey, located at 7 College Avenue, City of New Brunswick, County of Middlesex, and State of New Jersey.
7. At all times relevant hereto, Defendant, RUTGERS UNIVERSITY POLICE DEPARTMENT, is an entity existing under the law of the State of New Jersey, located at 55 Commercial Avenue, City of New Brunswick, County of Middlesex, and State of New Jersey.
8. At all times relevant hereto, Defendants, A.B.C. COMPANIES (1-100), are fictional Defendants designated as other corporations, partnerships, proprietorships, or other business entities responsible, individually and/or jointly or severally, or by their agents, servants, and/or employees, responsible for the care, custody, and safety of Decedent,

KENNETH J. PATTERSON, and/or for supervising, monitoring and/or overseeing fraternity events on or about December 9, 2017.

9. At all times relevant hereto, Defendants, JOHN DOES (1-100), are fictional Defendants designated as other individuals responsible, individually and/or jointly or severally, or by their agents, servants, and/or employees, for care, custody, and safety of Decedent, KENNETH J. PATTERSON, and/or for supervising, monitoring and/or overseeing fraternity events on or about December 9, 2017.
10. On or about December 9, 2017, Decedent, KENNETH J. PATTERSON, was an invitee at "TDXmas," an event hosted by Defendant, TDX, at 96 Huntington Street, in the City of New Brunswick, County of Middlesex, and State of New Jersey.
11. Upon information and belief, Defendant, TDX, was on a cease and desist order and was prohibited from sponsoring and/or hosting any fraternity related events.
12. At the same time and place as aforesaid, Defendant TDX, negligently, carelessly and recklessly served intoxicating alcohol to Decedent, KENNETH J. PATTERSON, a minor under the

legal age for consumption of alcohol, to the point of intoxication, and was otherwise careless, negligent, and reckless in protecting KENNETH J. PATTERSON from harm.

13. Decedent, KENNETH J. PATTERSON, left, was allowed to leave, or was assisted or taken from the TDXmas party, while visibly intoxicated, when he was subsequently violently struck by Amtrak Train #65, causing his fatal injuries.
14. At all times relevant hereto, Defendants, TDX, A.B.C. COMPANIES (1-100) (fictitious entities) and JOHN DOES (1-100) (fictitious names), had a duty to protect Decedent and similarly situated invitees from foreseeable dangers and harm resulting from the service, dispensing, and consumption of alcohol to persons who were not of legal age to consume same.
15. Defendants, TDX, A.B.C. COMPANIES (1-100) (fictitious entities) and JOHN DOES (1-100) (fictitious names), acted with complete disregard for the safety of others in promoting and facilitating the consumption of alcohol to the point of intoxication to persons less than twenty-one years of age, like Decedent, KENNETH J. PATTERSON, and were otherwise careless and inattentive in that they permitted Decedent,

KENNETH J. PATTERSON, to leave the party while visibly intoxicated, which led to his fatal accident.

16. As a direct and proximate result of the negligence, carelessness and recklessness of Defendants, Decedent, KENNETH J. PATTERSON, sustained fatal injuries, loss of the enjoyment of life's pleasures, funeral expenses, and his ultimate wrongful death on December 9, 2017 which are compensable in accordance with N.J.S.A.2A:15-3.
17. As a direct and proximate result of the negligence of the Defendants, as aforesaid, Plaintiff, THE ESTATE, sustained damages, including, but not limited to, the loss of companionship, support and pecuniary loss which are compensable in accordance with N.J.S.A.2A:31-1.
18. Decedent, KENNETH J. PATTERSON, was survived by his parents Brian T. Patterson, Sr., and Claudia Patterson, and various siblings.
19. The aforementioned survivors have jointly suffered and will continue to suffer as a direct and proximate result of the demise of Decedent, KENNETH J. PATTERSON.
20. Plaintiff, THE ESTATE, paid for funeral and burial expenses

and other expenses associated with the death of Decedent, KENNETH J. PATTERSON.

WHEREFORE, Plaintiff demands judgment against the Defendants, individually, concurrently, jointly and severally, for damages together with interest, costs of suit, attorney's fees, and such other and further relief as the Court may deem just and equitable.

SECOND COUNT

1. Plaintiff repeat the allegations contained in COUNT ONE as if set forth herein at length.
2. At all times relevant hereto, Defendant, TDX INTERNATIONAL, was the head of all local chapters (a/k/a "charges") and was responsible for training, supervising, monitoring, and enforcing the fraternity and university's code of conduct and policies.
3. Defendant, TDX INTERNATIONAL, had a duty to control and supervise its Fraternity members and chapters and oversee fraternity events including the TDXmas event conducted by Defendant, TDX.
4. Defendants, TDX INTERNATIONAL, knew, or should have known

about the unsanctioned fraternity event and the service of intoxicating alcohol to underage persons by TDX and failed to protect KENNETH J. PATTERSON from the foreseeable harm that was likely to result and was otherwise negligent.

5. As a direct and proximate result of TDX INTERNATIONAL'S NEGLIGENCE, as aforesaid, TDX INTERNATIONAL, A.B.C. COMPANIES (1-100) fictitious entities are liable for the death of KENNETH J. PATTERSON.

WHEREFORE, Plaintiff demands judgment against the Defendants, individually, concurrently, jointly and severally, for damages together with interest, costs of suit, attorney's fees, and such other and further relief as the Court may deem just and equitable.

THIRD COUNT

1. Plaintiff repeats the allegations contained in COUNTS ONE and TWO as if set forth herein at length.
2. At all times relevant hereto, Decedent, KENNETH J. PATTERSON, was a student at Rutgers State University.
3. At the same time and place aforesaid, Defendants, RUTGERS STATE UNIVERSITY, RUTGERS UNIVERSITY POLICE DEPARTMENT,

A.B.C. COMPANIES (1-100) (fictitious entities) and JOHN DOES (1-100) (fictitious names), had a duty and responsibility for the care, safety, protection and supervision of all members of the university community, including Decedent, KENNETH J. PATTERSON, and similarly situated students, and otherwise monitor and supervise the fraternities that are active at the University.

4. Defendants, RUTGERS STATE UNIVERSITY, RUTGERS UNIVERSITY POLICE DEPARTMENT, A.B.C. COMPANIES (1-100) (fictitious entities) and JOHN DOES (1-100) (fictitious names), knew or should have known about the unsanctioned fraternity event and service of intoxicating alcohol to underage persons, and otherwise negligently, carelessly, and recklessly failed to implement and/or enforce proper and effective policies and procedures regarding security, public safety, supervision of events and activities on or about the University campus involving alcohol and/or supervise fraternity events.
5. As a direct and proximate result of the negligence, carelessness and recklessness of Defendants, Decedent,

KENNETH J. PATTERSON, sustained fatal injuries, loss of the enjoyments of life's pleasures, funeral expenses and his ultimate wrongful death on December 9, 2017.

6. As a direct and proximate result of the negligence of Defendants, as aforesaid, Plaintiff, THE ESTATE, sustained damages including, but not limited to, the loss of companionship, support and pecuniary loss.

WHEREFORE, Plaintiffs demand judgment against the Defendants, individuals, concurrently, jointly and severally, for damages together with interests, costs of suit, attorney's fees, and such other and further relief as the court may deem just and equitable.

FOURTH COUNT

1. Plaintiff repeats the allegations contained in COUNTS ONE through THREE as if set forth herein at length.
2. At all times relevant hereto Defendants had a duty and were responsible for the care, custody, and/or safety of Decedent, KENNETH J. PATTERSON, and/or had a duty to supervise, monitor and/or oversee fraternity events on or about December 9, 2017.

3. As a direct and proximate cause of the negligence, carelessness and recklessness of Defendants, Decedent, KENNETH J. PATTERSON, sustained fatal injuries, loss of the enjoyment of life's pleasures, funeral expenses and his ultimate wrongful death on December 9, 2017.
4. As a direct and proximate result of the negligence of Defendants, as aforesaid, Plaintiff, THE ESTATE, sustained damages including, but not limited to, the loss of companionship, support and pecuniary loss.

WHEREFORE, Plaintiffs demand judgment against the Defendants, individuals, concurrently, jointly and severally, for damages together with interests, costs of suit, attorney's fees, and such other and further relief as the court may deem just and equitable.

DEMAND FOR PLEADINGS/DISCOVERY

TAKE NOTICE that the undersigned attorney(s), counsel for the Plaintiff, hereby demands pursuant to Rules 1:5-1(a); 4:17-2(b)(i) and 4:17-4(c), that each party herein provide any and all such pleadings and answered Interrogatories received from any party including any documents, papers and other materials referred to herein, upon the undersigned attorney, and answer Form C and

Form C(1) Interrogatories of Appendix II of the N.J. Rules of Court; and

TAKE NOTICE this is a continuing demand.

DEMAND FOR INSURANCE INFORMATION

Pursuant to R 4:10-2(b) state whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Attached a copy of each insurance policy or in the alternative state:

- A. Name and address of insurer or issuer;
- B. Policy name;
- C. Date of inception and expiration of coverage;
- D. Names and addresses of all persons insured thereunder;
- E. Name and address of person who has custody and possession of policy.

DEMAND FOR DOCUMENTS

1. Copies of any police, incident, accident reports, or any

reports prepared by or on behalf of defendant in connection with the happening of the subject accident.

2. Copies of any all photographs, videos, sketches, diagrams, depictions, or renderings of any kind, type, or description that relate to the subject accident, the scene or location where it occurred, any real and/or personal property involved or located at or near the accident locus, and/or injuries or treatment plaintiff sustained or underwent.
3. Copies of any and all photographs, videos, sketches, diagrams, depictions, or renderings of any kind, type, or description obtained or prepared by, or at the direction or request of, defendant or any agent, servant, or representative thereof, which depict anything which is relevant to the happening of the subject accident, the location where it occurred, the conditions which existed; and/or any instrumentalities involved therein, which were obtained, prepared, or secured after the accident.
4. True and exact copies of any and all CIB, ISO, or other searches or records of any kind, type, or description that relate to the existence and/or identification of any prior or

subsequent accidents, losses, claims, or lawsuits defendant claims plaintiff was involved in, asserted, or filed.

5. Copies of any written or recorded statements, or summaries of any oral statements, obtained from plaintiff relating to this or any other accident or claim.
6. Copies of any written or recorded statements, or summaries of any oral statements, obtained from any agent, servant, or representative of defendant.
7. Copies of any written or recorded statements, or summaries of any oral statements, obtained from any person possessing relevant knowledge of any aspect of this claim including eyewitnesses.
8. Copies of any documents, writings, or records of any kind, type, or description that contain or identify any admissions defendant claims were made by, or attributable to, plaintiff.
9. Copies of any and all records of any kind, type, or description, that defendant will utilize as substantive evidence in this case.
10. Copies of any and all records of any kind, type, or description defendant will utilize as impeachment evidence in

this case.

11. Copies of any reports, transcripts or records of any kind, type, or description defendant intends to utilize to impeach the credibility of plaintiff's experts whether said records constitute substantive or impeachment evidence.
12. Copies of any letters, correspondence, communications, or writings of any kind, type, or description exchanged between the parties.
13. Copies of any and all records of any kind, type, or description that relate to any medical conditions, treatment, or evaluations plaintiff was ever diagnosed with or underwent for any conditions, injuries, or treatment plaintiff was diagnosed with or underwent before or after the subject accident.
14. Copies of any weather or climatological records of any kind, type, or description that in any way relate to the subject accident, and/or which defendant intends to utilize at time of trial for any purpose.
15. Copies of any records or documents of any kind, type, or description that relate to and evidence any inspections,

maintenance, or repairs of defendant's property, or any fixtures, equipment, or instrumentalities involved in the subject accident which were undertaken or performed by defendant before or after the subject accident.

16. Copies of any records, documents, or writings of any kind, type, or description including, but not limited to, policies, procedures, store manuals or guidelines prepared by or on behalf of defendant that relate to and prescribe defendant's policies regarding the inspection and maintenance of defendant's premises.
17. Copies of any records or documents of any kind, type, or description, including, but not limited to, any certified copies of any conviction or guilty plea defendant claims relate to plaintiff.
18. Copies of any surveillance, photographs, or videos of any kind, type, or condition, which depict plaintiff, the accident, or any conditions which are in any way relevant to the happening of the subject accident.
19. Copies of any and all written contracts between the parties and copies of all written work orders executed subsequent to

the signing of the contract.

20. Copies of any and all records, documents, or writings of any kind, type, or description defendant will introduce into evidence or utilize for impeachment purposes at time of trial.
21. Any and all documents of any kind, type, or description which relate to the occurrence of any and all other accidents, suits, or claims arising out of the premises, property, locus, or instrumentality where the subject accident occurred or involved, including but not limited to copies of each and every pleading, answers to interrogatories, deposition transcripts, and court orders.
22. Copies of any records or documents of any kind, type or description that relate to and describe the existence of any and all procedures or policies relating to the handling, preservation, retention, or disposal of any video depicting anything which is relevant to the subject accident.
23. Copies of any records or documents of any kind, type or description that relate to any inspections of defendant's premises performed before plaintiff's accident occurred.
24. Copies of any records or documents of any kind, type or

description that relate to any inspections of defendant's premises performed after plaintiff's accident occurred.

25. Copies of any records or documents of any kind, type or description that relate to any evaluations undertaken by defendant to determine the cause of the subject accident in order to avoid the recurrence of same.
26. The name, address and job title of each and every of defendant's agents, servants, or representative's present at defendant's premises when plaintiff's accident occurred.
27. Copies of any records, documents, guidelines, directives or writings of any kind, type or description that describe and prescribe the manner in which defendant's employees are required to undertake any post-accident investigations, fact-gathering, or other actions including, but not limited to, conducting inspections, preparing reports, identifying witnesses, obtaining photos, or performing inspections after an accident occurs.
28. True and exact copies of any and all records, documents, or writings of any kind, type, or description defendant obtained or prepared that relate to and evidence any and all activities

undertaken or described in furtherance of the guidelines or directives described in Request Number 29.

29. True and exact copies of any sketches, drawings, depictions, lay-outs, or renderings of defendant's premises and/or physical plant including, but not limited to, any depictions of the interior and exterior thereof.
30. Copies of any surveys, plats, or legal description of defendant's property.
31. The name, address, and policy number of each and every insurance company insuring the property and/or premises where the subject accident occurred for the five (5) year period before the accident occurred and from the date of loss to the present time.
32. True and exact copies of any and all documents of any kind, type, or description that relate to the existence of any inspections performed by any insurance company as a condition precedent to insuring defendant's property or premises, or as a condition to maintain coverage already in existence, including, but not limited to, correspondence exchanged between defendant and any carrier identified herein directing

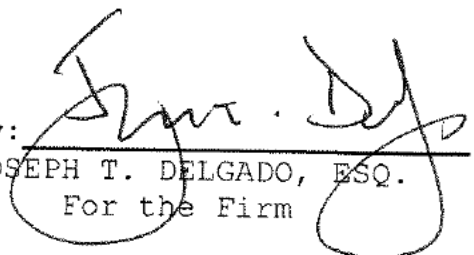
defendant to make any improvements to, or modifications of, defendant's premises.

33. True and exact copies of any documents of any kind, type, or description that relate to and evidence any notices, summons, tickets, cease and desist orders, or any communications issued by, or received from, any agency or division of the Federal, State, or Municipal government relating to defendant's violation or failure to comply with any statutes, codes, or ordinances including any Property Maintenance Codes.

Failure to provide the above within the thirty (30) day period required by Rule 4:18-1 will result in counsel for plaintiff applying to the Court for the appropriate sanctions, including but not limited to counsel fees and costs, precluding the use of any of the requested documents, as well as an Order, barring Defendants' defenses and striking their answer.

GARCES, GRABLER & LEBROCQ,
P.C.
Attorneys for Plaintiff

Dated: December 6, 2019

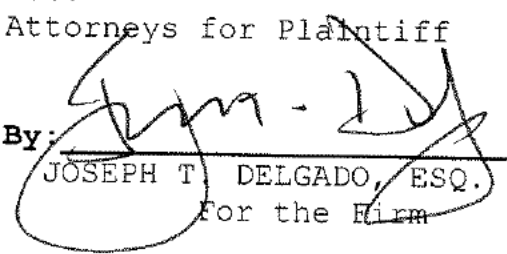
By: 
JOSEPH T. DELGADO, ESQ.
For the Firm

JURY DEMAND

The Plaintiff hereby demands a trial by jury on all of the triable issues of this Complaint, pursuant to Rule 1:8-2(b) and Rule 4:35-1(a).

GARCES, GRABLER & LEBROCQ,
P.C.
Attorneys for Plaintiff

Dated: December 6, 2019

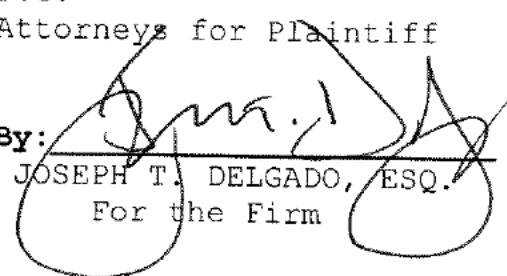
By: 
JOSEPH T. DELGADO, ESQ.
For the Firm

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, JOSEPH T. DELGADO, ESQ., is hereby designated as trial counsel for the Plaintiff in the above matter.

GARCES, GRABLER & LEBROCQ,
P.C.
Attorneys for Plaintiff

Dated: December 6, 2019

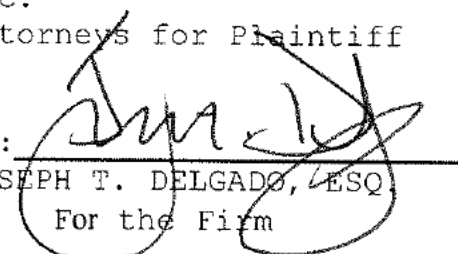
By: 
JOSEPH T. DELGADO, ESQ.
For the Firm

CERTIFICATION OF NON-PENDENCY

Pursuant to Rule 4:5-1, I hereby certify that to the best of my knowledge, the above captioned matter is not the subject of any other pending action in any Court or of a pending arbitration proceeding. I hereby certify that no other action or arbitration is being contemplated by the Plaintiffs at this time. Other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action.

GARCES, GRABLER & LEBROCQ,
P.C.

Attorneys for Plaintiff

By: 

JOSEPH T. DELGADO, ESQ.

For the Firm

Dated: December 6, 2019