

ELKIND and DIMENTO, P.A.
2090 East Route 70
Cherry Hill, New Jersey 08003
(856) 424-7800
Attorneys for Plaintiff

KAREN DENELSBECK	:	SUPERIOR COURT OF NEW JERSEY
	:	CAMDEN COUNTY
Plaintiff,	:	LAW DIVISION
	:	
v.	:	DOCKET NO. CAM-L-00715-04
	:	
MICHAEL PROBASCO,	:	Civil Action
PENNSAUKEN TOWNSHIP	:	
POLICE DEPARTMENT,	:	
PENNSAUKEN TOWNSHIP, JOHN:	:	
DOES 1-10, fictitious	:	SUMMONS
persons or corporations,	:	
jointly, severally or in	:	
the alternative	:	
	:	
Defendants.	:	

From The State of New Jersey

To The Named Defendant: PENNSAUKEN TOWNSHIP

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

Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. An \$110.00 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 to pay 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: February 12, 2004



DONALD F. PHELAN
Clerk of the Superior Court

NAME OF DEFENDANT TO BE SERVED: PENNSAUKEN TOWNSHIP

ADDRESS OF DEFENDANT TO BE SERVED: 5605 N. Crescent Boulevard,
Pennsauken, New Jersey 08110

ATLANTIC COUNTY:
Deputy Clerk of the
Superior Court
Civil Division,
Direct Filing
1201 Bacharach
Blvd., First Fl.
Atlantic City, NJ
08401
LAWYER REFERRAL
(609)345-3444
LEGAL SERVICES
(609)348-4200

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

BURLINGTON COUNTY:
Deputy Clerk of the
Superior Court
Central Processing
Office
Attn: Judicial
Intake
First F., Courts
Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609)261-4862
LEGAL SERVICES
(609)261-1086

CAMDEN COUNTY:
Deputy Clerk of the
Superior Court
Civil Processing
Office
1st Fl., Hall of
Records
101 S. Fifth St.
Camden, NJ 08103
LAWYER REFERRAL
(609)964-4520
LEGAL SERVICES
(609)964-2010

CAPE MAY COUNTY:
Deputy Clerk of the
Superior Court
Central Processing
Office
9 N. Main St.
Box DN-209
Cape May Court
House, NJ 08210
LAWYER REFERRAL
(609)463-0313
LEGAL SERVICES
(609)465-3001

CUMBERLAND COUNTY:
Deputy Clerk of the
Superior Court
Civil Case
Management Office
Broad & Fayette
Sts., P.O. Box 615
Bridgeton, NJ 08302
LAWYER REFERRAL
(609)692-6207
LEGAL SERVICES
(609)451-0003

ESSEX COUNTY:

Deputy Clerk of the
Superior Court
237 Hall of Records
465 Dr. Martin
Luther King, Jr.
Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(201)622-6207
LEGAL SERVICES
(201)624-4500

GLOUCESTER COUNTY:
Deputy Clerk of the
Superior Court
Civil Case
Management Office
Attn: Intake
First Fl., Court
House
1 North Broad St.,
P.O. Box 129
Woodbury, NJ 08096
LAWYER REFERRAL
(609)848-4589
LEGAL SERVICES
(609)848-5360

HUDSON COUNTY:
Deputy Clerk of the
Superior Court
Superior Court,
Civil Records Dept.
Brennan Court House
- 1st Fl.
583 Newark Ave.,
Jersey City, NJ
07306
LAWYER REFERRAL
(201)798-2727
LEGAL SERVICES
(201)792-6363

HUNTERDON COUNTY:
Deputy Clerk of the
Superior Court
Civil Division
65 Park Ave.
Flemington, NJ
08862
LAWYER REFERRAL
(609)735-2511
LEGAL SERVICES
(609)762-7979

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

MIDDLESEX COUNTY:
Deputy Clerk of the
Superior Court
Administration
Bldg., Third Fl.
1 Kennedy Sq., P.O.
Box 2633
LAWYER REFERRAL
(908)828-0053
LEGAL SERVICES
(908)249-7600

MONMOUTH COUNTY:
Deputy Clerk of the
Superior Court
71 Monument Park
P.O. Box 1262
Court House, East
Wing
Freehold, NJ 07728-
1262
LAWYER REFERRAL
(908)431-5544
LEGAL SERVICES
(908)866-0020

MORRIS COUNTY:
Deputy Clerk of the
Superior Court
Civil Division
30 Schuyler Pl.,
P.O. Box 910
Morristown, NJ
07960-0910
LAWYER REFERRAL
(201)267-5862
LEGAL SERVICES
(201)285-6911

OCEAN COUNTY:
Deputy Clerk of the
Superior Court
Court House, Room
119
118 Washington St.
Toms River, NJ
08754
LAWYER REFERRAL
(908)240-3666
LEGAL SERVICES
(908)341-2727

PASSAIC COUNTY:
Deputy Clerk of the
Superior Court
Civil Division
Court House
77 Hamilton St.
Paterson, NJ 07505
LAWYER REFERRAL
(201)278-9223
LEGAL SERVICES
(201)345-7171

SALEM COUNTY:
Deputy Clerk of the
Superior Court
92 Market St., P.O.
Box 18
Salem, NJ 08079
LAWYER REFERRAL
(609)678-8363
LEGAL SERVICES
(609)451-0003

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

SUSSEX COUNTY:
Deputy Clerk of the
Superior Court
Sussex County
Judicial Center
43-47 High St.
Newton, NJ 07960
LAWYER REFERRAL
(201)267-5882
LEGAL SERVICES
(201)383-7400

UNION COUNTY:
Deputy Clerk of the
Superior Court
1st Fl., Court
House
2 Broad St.
Elizabeth, NJ
07207-6073
LAWYER REFERRAL
(908)353-4715
LEGAL SERVICES
(908)354-4340

WARREN COUNTY:
Deputy Clerk of the
Superior Court
Civil Division
Office
Court House
Belvidere, NJ
07823-1500
LAWYER REFERRAL
(201)267-5882
LEGAL SERVICES
(908)475-2010



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial Law Division - Civil Part pleadings (not motions) under Rule 4:5-1.
Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or if attorney's signature is not affixed.

FOR USE BY CLERKS OFFICE ONLY

PAYMENT TYPE: CK CG CA

CHG / CK NO.

AMOUNT:

OVERPAYMENT:

BATCH NUMBER:

ATTORNEY / PRO SE NAME

TELEPHONE NUMBER

COUNTY OF VENUE

Anthony F. DiMento Esquire (856) 424-7800

Camden

FIRM NAME (if applicable)

DOCKET NUMBER (when available)

ElKind and DiMento P.A.

L 00715 04

OFFICE ADDRESS

2090 East Route 70
Cherry Hill NJ 08003

DOCUMENT TYPE

Complaint

JURY DEMAND

☒ YES ☐ NO

NAME OF PARTY (e.g. John Doe, Plaintiff)

CAPTION

Karen Denelsbeck,
Plaintiff

Karen Denelsbeck v. Michael Probasco,
Pennsauken Twp Police Dept, Pennsauken
Township, et al.

CASE TYPE NUMBER
(See reverse side
for listing)

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

☐ 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

A. DO PARTIES HAVE A CURRENT,
PAST OR RECURRENT
RELATIONSHIP?

☒ YES ☐ NO

IF YES, IS THAT
RELATIONSHIP

☒ EMPLOYER-EMPLOYEE

☐ FRIEND / NEIGHBOR

☐ OTHER (explain) _____

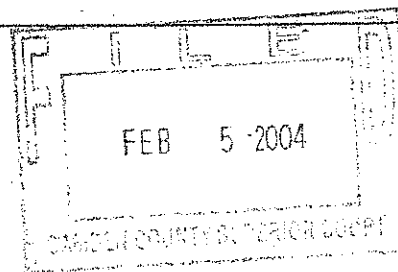
☐ FAMILIAL

☐ BUSINESS

B. 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?

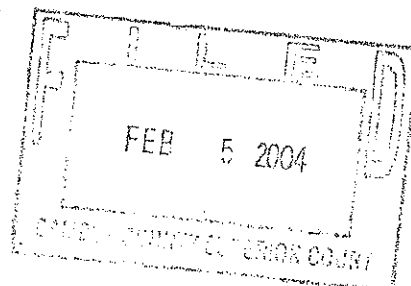
☐ YES ☒ NO

IF YES, FOR WHAT LANGUAGE: _____

ATTORNEY SIGNATURE

[Signature]

ELKIND and DIMENTO, P.A.
2090 East Route 70
Cherry Hill, New Jersey 08003
(856) 424-7800
Attorneys for Plaintiff



KAREN DENELSBECK	:	SUPERIOR COURT OF NEW JERSEY
	:	CAMDEN COUNTY
Plaintiff,	:	LAW DIVISION
	:	
v.	:	DOCKET NO. L 00715 04
	:	
MICHAEL PROBASCO,	:	Civil Action
PENNSAUKEN TOWNSHIP	:	
POLICE DEPARTMENT,	:	COMPLAINT, DEMAND FOR JURY
PENNSAUKEN TOWNSHIP, JOHN:	:	TRIAL, AND DESIGNATION OF
DOES 1-10, fictitious	:	TRIAL COUNSEL
persons or corporations,	:	
jointly, severally or in	:	
the alternative	:	
	:	
Defendants.	:	

Plaintiff, Karen Denelsbeck, residing in Egg Harbor City,
New Jersey, by way of Complaint against defendants says:

FIRST COUNT

**VIOLATION OF NEW JERSEY LAW AGAINST DISCRIMINATION
N.J.S.A. 10:5-1, et seq.**

1. At all times relevant herein Plaintiff was and is a
Pennsauken Township Police Officer.
2. At all times relevant herein Plaintiff was and is an
employee of both Defendant Pennsauken Township (hereinafter
referred to as "Township") and Defendant Pennsauken Township
Police Department (hereinafter referred to as "Department").

3. At all times relevant herein Defendant Lieutenant Michael Probasco (hereinafter referred to as "Defendant Lieutenant Probasco") was an employee of the Defendants Township and Department.

4. At all times relevant herein Defendant Lieutenant Probasco was Plaintiff's supervisor.

5. At all times relevant herein Defendant Lieutenant Probasco was Plaintiff's supervisor and in a position of responsibility in the Defendant Department.

6. At all times relevant herein Defendant Lieutenant Probasco was aware that the Plaintiff was and is married to Gary Denelsbeck a Police Officer of Township of Evesham State of New Jersey.

7. In and about June 1998 the Plaintiff found out that she was pregnant and Defendant Lieutenant Probasco asked the Plaintiff if "she was going to keep it?". That began Plaintiff's uncomfortable feelings with Defendant Lieutenant Probasco. Plaintiff was quite upset that Defendant Lieutenant Probasco would even question a woman's personal decision.

8. In and about June 14, 2002 Defendant Lieutenant Probasco attended a wedding with Defendant Department employee Patrolman Wayne Fowler.

9. Shortly after the wedding Defendant Lieutenant Probasco had a conversation with Patrolman Fowler at a bar.

10. Defendant Lieutenant Probasco asked Patrolman Fowler if the Plaintiff and Patrolman G. Henkle were having an affair.

11. Defendant Lieutenant Probasco asked Patrolman Fowler what he thought the Defendant's chances were with the Plaintiff.

12. Patrolman Fowler advised Plaintiff of this conversation.

13. Thereafter on July 9, 2002 after a Domestic Violence meeting, Plaintiff was exiting the building with Defendant Lieutenant Probasco and advised him that she was not feeling well and needed to utilize a sick day. Defendant Lieutenant Probasco responded by saying "a beer would make you feel better". Plaintiff advised the Defendant that she was in route to pick up her children and he replied that they were fine where they were.

14. On or about August 20, 2002 Plaintiff was in the Traffic Division speaking with a female co-employee when Defendant Lieutenant Probasco asked Plaintiff "Do you want to go to New York?"

15. Defendant Lieutenant Probasco told Plaintiff that there was Domestic Violence Grant money that would pay for two people to attend a Domestic Violence Seminar in New York.

16. Defendant Lieutenant Probasco told the Plaintiff he and another person could attend but it was to far to travel back and forth each day and did the Plaintiff want to go.

17. Plaintiff advised Defendant Lieutenant Probasco no.

18. Defendant Lieutenant Probasco responded back telling Plaintiff she could tell her husband she was with another female in a sexually suggestive manner.

19. Plaintiff felt uncomfortable with Defendant Lieutenant Probasco that the Defendant wanted the Plaintiff to lie to her husband and go along with him to New York.

20. Plaintiff left work that day embarrassed, upset and scared.

21. On or about August 20, 2002 Plaintiff reported that Defendant Lieutenant Probasco was sexually harassing her to Detective Sergeant D. Henkle of the Defendant Department Detective Division.

22. Plaintiff was aware of Defendant Lieutenant Probasco's other relationships with females in the Defendant Department and became afraid of suffering consequences and repercussions from Defendant Lieutenant Probasco for reporting the above incident.

23. On or about August 21, 2002 while in Defendant Department Station, Defendant Lieutenant Probasco and a Lieutenant Conner

were standing in the foyer area.

24. At the same time and place Lieutenant Connor asked me if I was going to New York and I responded no.

25. At the same time and place I could see Defendant Lieutenant Probasco smiling and shaking his head "yes".

26. Lieutenant Connor's statement and Defendant Lieutenant Probasco's smiling at the Plaintiff confirmed her suspicion that her reputation was being damaged and that Plaintiff suffered anxiety over what else was being said at her expense.

27. On or about October 6, 2003 Plaintiff was transferred to the 7:00 a.m. - 3:00 p.m. Traffic Division.

28. This was after Plaintiff's repeated request to be removed from under the supervision of Defendant Lieutenant Probasco.

29. However, for the first time Defendant Lieutenant Probasco created a new policy that would make an EMT float and put a traffic officer in a patrol beat.

30. The above policy had never been done before.

31. Plaintiff was the lowest ranked traffic officer on day work schedule which would mean that Plaintiff would be the first officer to be placed into a patrol beat again directly under the supervision of Defendant Lieutenant Probasco.

32. Plaintiff was upset that this was retaliation and Defendant Lieutenant Probasco continued to control to be in her presence.

33. Plaintiff had been assigned to the Domestic Violence Liaison Team and worked directly under and with Defendant Lieutenant Probasco.

34. After Plaintiff's complaints herein, Defendant Lieutenant Probasco in retaliation removed her from the Domestic Violence Liaison Team.

35. Defendant Lieutenant Probasco walks with an attitude and looks at Plaintiff with the attitude that he got away with harassment which is very uncomfortable to the Plaintiff.

36. From June 2002 continuing to the present Defendant Lieutenant Probasco's very presence created and creates a hostile work environment to the Plaintiff.

37. Prior to and subsequent to Plaintiff's Complaint Defendant Lieutenant Probasco remained Plaintiff's direct supervisor.

38. Chief of Police John Coffey advised Plaintiff that he would not move Defendant Lieutenant Probasco out of the supervisory position over the Plaintiff.

39. That Defendant Lieutenant Probasco as Plaintiff's supervisor attempted to exploit the supervisory position to sexually harass the Plaintiff.

40. As a result of Defendant Lieutenant Probasco's harassment and sexual advances, Plaintiff has suffered embarrassment, anxiety and has otherwise been injured.

41. Plaintiff seeks to protect her property interests and her continuing employment with the Defendant Department.

42. As a result of Defendant Lieutenant Probasco's harassment, Plaintiff has been subject to a hostile work environment, discrimination, sexual harassment in violation of New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, et seq.

43. Defendant Lieutenant Probasco's conduct was knowing, intentional, willful and reckless occurred with actual malice with willful wanton disregard of Plaintiff's civil rights under the New Jersey Law Against Discrimination and the New Jersey Constitution entitling Plaintiff to punitive damages.

44. As a direct and proximate result of the foregoing, Plaintiff has been damaged.

WHEREFORE, Plaintiff demands judgment against Defendants Lieutenant Probasco, Township of Pennsauken, Pennsauken Township Police Department, jointly, severally or in the alternative for compensatory damages, punitive damages, interest, attorney's fees, costs of suit, all remedies under N.J.S.A. 10:5-1, et seq. and such other relief as is just and equitable.

SECOND COUNT

VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION
N.J.S.A. 10:5-1, et. seq. - QUID PRO QUO SEXUAL HARASSMENT

45. Plaintiff, Karen Denelsbeck, hereby repeats each and

every allegation of the First Count in its entirety as if set forth more fully at length herein.

46. Plaintiff's reaction to the harassment complained of effected the condition of her employment.

47. Plaintiff was deprived of her job work with the Domestic Violence Liaison Team after complaints against Defendant Lieutenant Probasco.

48. Defendant Lieutenant Probasco by his foregoing described actions subjected Plaintiff to Quid Pro Quo Sexual Harassment in violation of New Jersey Law Against Discrimination.

49. As a result of Defendant Lieutenant Probasco's above described actions, Plaintiff has suffered and continues to suffer emotional distress, anxiety, embarrassment, humiliation, reputational and other personal injuries.

WHEREFORE, Plaintiff demands judgment against Defendants Lieutenant Probasco, Township of Pennsauken and Pennsauken Township Police Department, jointly, severally or in the alternative for compensatory damages, punitive damages, interest, attorney's fees, costs of suit, all remedies under N.J.S.A. 10:5-1, et seq. and such other relief as is just and equitable.

THIRD COUNT

VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION N.J.S.A. 10:5-12(d) RETALIATION FOR COMPLAINING ABOUT SEXUAL HARASSMENT

50. Plaintiff, Karen Denelsbeck, hereby repeats each and every allegation of the First Count and Second Counts in their entirety as if set forth more fully at length herein.

51. Defendant Lieutenant Probasco by his foregoing described retaliatory actions, caused Plaintiff to suffer and continues to suffer emotional distress, anxiety, embarrassment, humiliation, reputational and other personal injuries.

WHEREFORE, Plaintiff demands judgment against Defendants Lieutenant Probasco, Township of Pennsauken and Pennsauken Township Police Department jointly, severally or in the alternative for compensatory damages, punitive damages, interest, attorney's fees, costs of suit, all remedies under N.J.S.A. 10:5-1, et seq. and such other relief as is just and equitable.

FOURTH COUNT

NEGLIGENCE

52. Plaintiff, Karen Denelsbeck, hereby repeats each and every allegation of the First Count, Second Count and Third Counts in their entirety as if set forth more fully at length herein.

53. Defendants Township and Department were negligent and reckless by failing to have in place well publicized and enforced sexual harassment policies.

54. Defendants Township and Department did not have effective formal nor informal complaint structures, training nor monitoring.

55. To the best of Plaintiff's knowledge, no actions were taken against Defendant Lieutenant Probasco nor any procedures made in place to prevent any ongoing harassment to the Plaintiff.

56. Defendants Township and Department were negligent and reckless in the handling of Plaintiff's complaints.

57. As a result of Defendants Township and Department reckless and negligent handling of the complaints herein, Plaintiff has suffered and continues to suffer emotional distress, anxiety, embarrassment, humiliation, reputational and other personal injuries.

58. As a result of Defendant Township and Departments wilful indifference to Plaintiff's complaints herein, Plaintiff is entitled to punitive damages.

WHEREFORE, Plaintiff demands judgment against Defendants Lieutenant Probasco, Township of Pennsauken and Pennsauken Township Police Department, jointly, severally or in the alternative for compensatory damages, punitive damages,

interest, attorney's fees, costs of suit, all remedies under N.J.S.A. 10:5-1, et seq. and such other relief as is just and equitable.

FIFTH COUNT

JOHN DOES

59. Plaintiff, Karen Denelsbeck, hereby repeats each and every allegation of the First Count, Second Count, Third and Fourth Counts in their entirety as if set forth more fully at length herein.

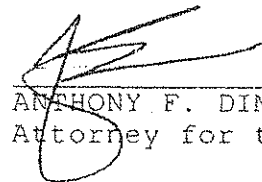
60. Although the Plaintiff believes that the acts complained of were performed or caused by the named Defendants, the Plaintiff cannot be certain that the named Defendants are the only person(s) or entity(ies) liable for the acts complained of as set forth herein. Therefore, the Plaintiff has named John Does 1 - 10, fictitious persons or legal entities as Defendant(s) to this action.

61. As such, the terms "Defendant" or "Defendants" as used in all of the above Counts and paragraphs should therefore be defined and read as "Defendant(s) and/or John Doe(s)".

WHEREFORE, the Plaintiff demands judgment against Defendants and John Does 1 - 10, jointly, severally, and in the alternative for such sums as would reasonably and properly

compensate the Plaintiff in accordance with the laws of the State of New Jersey, together with interest and costs of suit.

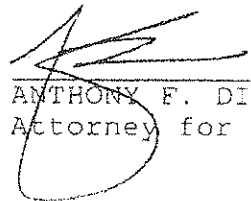
DATED: 2/4/04


ANTHONY F. DIMENTO, ESQUIRE
Attorney for the Plaintiffs

JURY DEMAND

Plaintiff hereby demands a trial by jury of twelve persons as to all issues.

DATED: 2/4/04

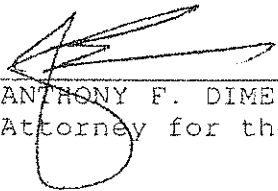

ANTHONY F. DIMENTO, ESQUIRE
Attorney for the Plaintiff

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to Rule 4:10-2(b), demand is made that defendant disclose to plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declarations sheets. This demand shall include and cover not only primary coverage, but also any and all excess, catastrophe and umbrella policies.

DATED:

2/7/04

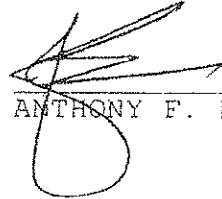


ANTHONY F. DIMENTO, ESQUIRE
Attorney for the Plaintiffs

NOTICE OF TRIAL COUNSEL DESIGNATION

PLEASE BE NOTIFIED that pursuant to R.4:25-4, Anthony F. DiMento, Esquire, is hereby designated as Trial Counsel relative to the above captioned litigation on behalf of the firm of Elkind and DiMento, P.A.

DATED: 2/4/04


ANTHONY F. DIMENTO, ESQUIRE

CAMDEN COUNTY
SUPERIOR COURT
HALL OF JUSTICE
CAMDEN

NJ 08103

COURT TELEPHONE NO. (856) 379-2200
COURT HOURS
TRACK ASSIGNMENT NOTICE

DATE: FEBRUARY 09, 2004
RE: DENELSECK VS PROBASCO
DOCKET: CAM L -000715 04

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 LOUISE D. DONALDSON

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (856) 379-2200

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: ANTHONY F. DIMENTO
ELKIND & DIMENTO
2090 EASR ROUTE 70
CHERRY HILL NJ 08003

JUAXM2