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43 West Blackwell Street
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Attorneys for Plaintiffs

Jonathan Aguirre Reyes,

Plaintiff,

vs.

Town of Morristown, State of New Jersey,
Department of Transportation, County of Morris,
John Does #1 through #10, and Government Entity,
#1 through #10, ABC Corp #1 through #10, name
being fictitious,

Defendants.

SUPERIOR COURT OF NEW JERSEY
MORRIS COUNTY: LAW DIVISION

Docket No. L-1228-20

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. (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, and P.O. Box 971, Trenton, NJ 086250971. 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 \$135.00 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). 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.

Michelle M. Smith, Esq.,
Clerk of the Superior Court

DATED:

Name of Defendant to Be Served: Town of Morristown
Address of Defendant to Be Served 200 South St, Morristown, NJ 07960

NOTE: The Case Information Statement is available at www.nicourts.com.

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Attorneys for Plaintiff

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Plaintiff,

vs.

Town of Morristown, State of New Jersey,
Department of Transportation, County of
Morris, John Does #1 through #10, and
Government Entity, #1 through #10, ABC
Corp #1 through #10, name being fictitious,

Defendants.

SUPERIOR COURT OF NEW JERSEY
MORRIS COUNTY: LAW DIVISION

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CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, Jonathan Aguirre Reyes, currently residing at [REDACTED],

[REDACTED], by way of Complaint against the
Defendants, says:

FIRST COUNT

1. On or about June 16, 2018, the Plaintiff, Jonathan Aguirre Reyes, was lawfully thereon as a member of the public at the Elliott Street Playground/Park, Morristown, County of Morris, and State of New Jersey.
2. At the time and place aforesaid, Defendants, owned, operated, controlled, and maintained the public playground/park in a negligence, careless, reckless and/or intentional manner.

3. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, Plaintiff was caused to be injured.

4. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, and the resulting injury sustained by the Plaintiff, Jonathan Aguirre Reyes, Plaintiff Jonathan Aguirre Reyes sustained and received severe, painful and permanent injuries, both internal and external, with accompanying great pain, mental anguish and shock, was and will be confined, was and will incur various sums of money for medical aid and necessary relief and attention, was rendered sick, sore, lame and prostrate, was made to undergo and will undergo great physical and mental anguish, which he suffers and will continue to suffer for an indefinite period of time in the future, and was and will be deprived and prevented from attending his normal activities, all to his loss, damage and detriment.

WHEREFORE, Plaintiff Jonathan Aguirre Reyes demands judgment against the Defendants, for damages both consequential and compensatory, interests, pain and suffering, attorneys fees and costs of suit.

SECOND COUNT

1. Plaintiffs repeats the allegations as set forth above, as if same were set forth at length herein.

2. At the time and place aforesaid, Defendants, were the owner, operator, controller, and maintainer of the public playground/park and all apparatuses located on and around the area

located at Elliott Street Playground/Park, Morristown, County of Morris, and State of New Jersey.

3. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, Plaintiff, Jonathan Aguirre Reyes was caused to be injured.

4. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, and the resulting injury sustained by the Plaintiff, Jonathan Aguirre Reyes, Plaintiff Jonathan Aguirre Reyes sustained and received severe, painful and permanent injuries, both internal and external, with accompanying great pain, mental anguish and shock, was and will be confined, was and will incur various sums of money for medical aid and other necessary relief and attention, was rendered sick, sore, lame and prostrate, was made to undergo and will undergo great physical and mental anguish, which he suffers and will continue to suffer for an indefinite period of time in the future, and was and will be deprived and prevented from attending his normal activity, all to his loss, damage and detriment.

WHEREFORE, Plaintiff Jonathan Aguirre Reyes demands judgment against the Defendants, for damages both consequential and compensatory, interests, pain and suffering, attorneys fees and costs of suit.

THIRD COUNT

1. Plaintiffs repeats the allegations as set forth above, as if same were set forth at length herein.

2. At the time and place aforesaid, Defendants, John Does #1 through #10, were the owners, operators, controllers, and maintainers of Elliott Street Playground/Park, Morristown, County of Morris, and State of New Jersey.

3. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendant, John Does #1 through #10, Plaintiff Jonathan Aguirre Reyes was caused to be injured.

4. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendant, John Does #1 through #10, and the resulting injury sustained by the Plaintiff Jonathan Aguirre Reyes, Plaintiff Jonathan Aguirre Reyes sustained and received severe, painful and permanent injuries, both internal and external, with accompanying great pain, mental anguish and shock, was and will be confined, was and will incur various sums of money for medical aid and other necessary relief and attention, was rendered sick, sore, lame and prostrate, was made to undergo and will undergo great physical and mental anguish, which he suffers and will continue to suffer for an indefinite period of time in the future, and was and will be deprived and prevented from attending his normal business and vocation, all to his loss, damage and detriment.

WHEREFORE, Plaintiff Jonathan Aguirre Reyes demands judgment against the Defendants, for damages both consequential and compensatory, interests, pain and suffering, attorneys fees and costs of suit.

FOURTH COUNT

1. Plaintiffs repeats the allegations as set forth above, as if same were set forth at length herein.
2. At the time and place aforesaid, Defendants, ABC Corp., #1 through #10, name being fictitious, were the owners, operators, controllers, and maintainers, of Elliott Street Playground/Park, Morristown, County of Morris, and State of New Jersey.
3. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, ABC Corp., #1 through #10, name being fictitious, Plaintiff Jonathan Aguirre Reyes was caused to be injured.
4. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, ABC Corp., #1 through #10, name being fictitious, and the resulting injury sustained by the Plaintiff Jonathan Aguirre Reyes, Plaintiff Jonathan Aguirre Reyes sustained and received severe, painful and permanent injuries, both internal and external, with accompanying great pain, mental anguish and shock, was and will be confined, was and will incur various sums of money for medical aid and other necessary relief and attention, was rendered sick, sore, lame and prostrate, was made to undergo and will undergo great physical and mental anguish, which he suffers and will continue to suffer for an indefinite period of time in the future, and was and will be deprived and prevented from attending his normal business and vocation, all to his loss, damage and detriment.

WHEREFORE, Plaintiff Jonathan Aguirre Reyes demands judgment against the Defendants, for damages both consequential and compensatory, interests, pain and suffering, attorneys fees and costs of suit.

FIFTH COUNT

3. Plaintiffs repeats the allegations as set forth above, as if same were set forth at length herein.

4. At the time and place aforesaid, Defendants, Government Entity, #1 through #10, name being fictitious, were the owners, operators, controllers, and maintainers, of Elliott Street Playground/Park, Morristown, County of Morris, and State of New Jersey.

3. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, Government Entity, #1 through #10, name being fictitious, Plaintiff Jonathan Aguirre Reyes was caused to be injured.

4. As a direct and proximate result of the negligence, careless, reckless and/or intentional conduct of Defendants, Government Entity, #1 through #10, name being fictitious, and the resulting injury sustained by the Plaintiff Jonathan Aguirre Reyes, Plaintiff Jonathan Aguirre Reyes sustained and received severe, painful and permanent injuries, both internal and external, with accompanying great pain, mental anguish and shock, was and will be confined, was and will incur various sums of money for medical aid and other necessary relief and attention, was rendered sick, sore, lame and prostrate, was made to undergo and will undergo great physical and

mental anguish, which he suffers and will continue to suffer for an indefinite period of time in the future, and was and will be deprived and prevented from attending his normal business and vocation, all to his loss, damage and detriment.

WHEREFORE, Plaintiff Jonathan Aguirre Reyes demands judgment against the Defendants, for damages both consequential and compensatory, interests, pain and suffering, attorneys fees and costs of suit.

DESIGNATION OF TRIAL COUNSEL

In accordance with Court Rule 4:25-4, Jonathan Aguirre Reyes, hereby designates Lee M. Levitt, LLC, as trial counsel in this matter.

JURY DEMAND

Plaintiff demands a jury trial.

DEMAND FOR DISCOVERY

Pursuant to Rule 4:18-1. Plaintiffs hereby demands that Defendants provide the following:

1. All documents concerning, referring and/or relating to Plaintiffs;
2. All documents concerning, referring and/or relating to Defendant's Maintenance of the premises alleged in the Complaint;
3. All documents concerning, referring and/or relating to Defendant's insurance coverage for the alleged incident.

Pursuant to Rule 4:17-1, Plaintiffs hereby demand that the Defendants provide complete certified answers to Interrogatories Forms C and C (2).

CERTIFICATION PURSUANT TO R. 4:5-1

Pursuant to R. 4:5-1, the undersigned attorney for Plaintiffs hereby certifies that to the best of the undersigned information, knowledge and belief, the within action is not presently the subject of any other action presently pending in any court or of a pending arbitration proceeding to date, nor is there any other action, except as set-forth above, or arbitration proceeding contemplated at this time.

Lee M. Levitt, LLC
Attorneys for Plaintiffs

By: _____

Lee M. Levitt, Esq.

Dated: June 11, 2020

Civil Case Information Statement

Case Details: MORRIS Civil Part Docket# L-001228-20

Case Caption: AGUIRRE REYES JONATHAN VS TOWN
OF MORRISTOWN

Case Initiation Date: 06/11/2020

Attorney Name: LEE MICHAEL LEVITT

Firm Name: LEE M. LEVITT

Address: 43 WEST BLACKWELL ST

DOVER NJ 07801

Phone: 9738849200

Name of Party: PLAINTIFF : Aguirre Reyes, Jonathan

Name of Defendant's Primary Insurance Company

(If known): None

Case Type: PERSONAL INJURY

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 by: Jonathan Aguirre Reyes? 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? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? 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? 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)

06/11/2020

Dated

/s/ LEE MICHAEL LEVITT

Signed