

LEONARD LEGAL GROUP, LLC
Scott G. Leonard, Esq.
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165 Washington Street
Morristown, New Jersey 07960
Tel. No. (973) 984-1414
Attorneys for Plaintiff(s)



JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO, Plaintiff(s), vs. TOWNSHIP OF MORRISTOWN, MORRISTOWN SHADE TREE COMMISSION, CHURCH OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, ABC COMPANY 1-10 (said names being fictitious and unknown), JOHN DOES 1- 10 (said names being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and/or JOE DOES 1-10 (said names being fictitious and unknown) Defendant(s).	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MORRIS COUNTY DOCKET NO. MRS-L-1597-20 CIVIL ACTION SUMMONS
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THE STATE OF NEW JERSEY, TO THE ABOVE-NAMED DEFENDANT(S):

TOWNSHIP OF MORRISTOWN

YOU ARE HEREBY SUMMONED in a Civil Action in the Superior Court of New Jersey, instituted by the above named plaintiff(s), and required to serve upon the attorneys for the plaintiff(s), whose name and office address appears above, an Answer to the annexed Complaint within THIRTY-FIVE (35) days after the service of the Summons and Complaint upon you, exclusive of the day of service. 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. (A directory of the addresses of each

deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) 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, P.O. Box 971, Trenton, NJ 08625-0971. 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 \$175.00 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). 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 directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Michelle M. Smith

Michelle M. Smith
Clerk of the Superior Court

DATED: August 10, 2020

**(NOTE: IF YOU ARE INSURED FOR THE INCIDENT IN QUESTION,
THESE PAPERS SHOULD IMMEDIATELY BE TURNED OVER TO YOUR
INSURANCE AGENT OR INSURANCE COMPANY)**

NAME(S) AND ADDRESS(ES) OF DEFENDANT(S) TO BE SERVED:

**TOWNSHIP OF MORRISTOWN
200 South Street
Morristown, New Jersey 07960**

LEONARD LEGAL GROUP, LLC
Scott G. Leonard, Esq.- 044181996
165 Washington Street
Morristown, New Jersey 07960
Tel: (973)-984-1414
Fax: (973)-984-2599
E-mail: Sleonard@leonardlawyers.com
Attorneys for Plaintiffs

JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO, Plaintiff(s), vs. TOWNSHIP OF MORRISTOWN, MORRISTOWN SHADE TREE COMMISSION, CHURCH OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, ABC COMPANY 1-10 (said names being fictitious and unknown), JOHN DOES 1-10 (said names being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and/or JOE DOES 1-10 (said names being fictitious and unknown)	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY DOCKET NO.: MRS-L- -20 CIVIL ACTION COMPLAINT, JURY DEMAND, DEMAND FOR CERTIFIED TO UNIFORM INTERROGATORIES AND OTHER RELATED DOCUMENTS WITHIN SIXTY (60) DAYS OF SERVICE OF THE WITHIN COMPLAINT IN LIEU OF SERVICE OF SAME PURSUANT TO RULE 4:17-1, 2 AND 4 et seq., DEMAND FOR INSURANCE POLICIES PURSUANT TO RULE 4:10-2(b), DESIGNATION OF TRIAL COUNSEL AND ATTORNEY'S CERTIFICATION PURSUANT TO RULE 4:5-1
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Plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO,
residing in New Jersey, complaining of the above-named defendants, says that:

COUNT ONE

1. On November 30, 2018, the plaintiff decedent, ETHEL FASULO was a business invitee as a wedding ceremony guest at the Church of Assumption of Blessed Virgin Mary located at the premises of 91 Maple Avenue, Morristown, New Jersey, when while walking in a careful and prudent manner on the sidewalk at the subject premises she was caused to trip and fall due to the sidewalk being raised and uneven, proximately

causing decedent, ETHEL FASULO to fall and sustain severe and traumatic personal injuries, which ultimately led to her death. Decedent, ETHEL FASULO succumbed to her personal injuries and ultimately died testate on January 7, 2019.

2. At all times mentioned herein and prior thereto, the defendants, TOWNSHIP OF MORRISTOWN, MORRISTOWN SHADE TREE COMMISSION, ABC COMPANY1-10 (said names being fictitious and unknown) and/or JOHN DOES 1-10 (said names being fictitious and unknown), were responsible to maintain, inspect, repair, and remediate the subject uneven sidewalk which was caused by overgrown roots of a tree on or near the subject sidewalk where the decedent plaintiff's accident occurred.

3. At all times mentioned herein, the defendants, DEF COMPANY1-10 (said names being fictitious and unknown) and/or JOE DOES 1-10 (said names being fictitious and unknown) were acting as the servants, agents or employees of the defendants, TOWNSHIP OF MORRISTOWN and MORRISTOWN SHADE TREE COMMISSION.

4. At all times mentioned herein, the defendants, CHURCH OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, GHI COMPANY 1-10 (said names being fictitious and unknown) and/or JIM DOES 1-10 (said names being fictitious and unknown) owned, leased, controlled, maintained, monitored, and/or oversaw a certain premises located at 91 Maple Avenue, Morristown, New Jersey, together with a certain sidewalk located thereon and were responsible to maintain, inspect, repair, and remediate the subject uneven sidewalk

5. At all times mentioned herein, the defendants, JKL COMPANY 1-10 (said names being fictitious and unknown) and/or JANE DOES 1-10 (said names being fictitious and unknown), were acting as the servants, agents or employees of the defendants, CHURCH

OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, ABC COMPANY 1-10 (said names being fictitious and unknown) and/or JOHN DOES 1-10 (said names being fictitious and unknown).

6. At all times mentioned herein, the decedent plaintiff, ETHEL FASULO, was lawfully upon the aforesaid premises as a business invitee.

7. At all times mentioned herein and prior thereto, the defendants, TOWNSHIP OF MORRISTOWN, MORRISTOWN SHADE TREE COMMISSION, ABC COMPANY 1-10 (said names being fictitious and unknown) and/or JOHN DOES 1-10 (said names being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and/or JOE DOES 1-10 (said names being fictitious and unknown), CHURCH OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, GHI COMPANY 1-10 (said names being fictitious and unknown) and/or JIM DOES 1-10 (said names being fictitious and unknown), JKL COMPANY 1-10 (said names being fictitious and unknown), and/or JANE DOES 1-10 (said names being fictitious and unknown), individually or by their servants, agents or employees, were careless and negligent in the ownership, leasing, construction, maintenance, operation, control, repair, and inspection of the aforesaid premises, including the subject uneven sidewalk; which caused decedent plaintiff, ETHEL FASULO to trip and fall sustaining severe and traumatic personal injuries, which ultimately led to her death, and thereon, created and/or maintained a dangerous and/or hidden and/or hazardous condition and/or a nuisance and/or trap in connection with the aforesaid premises and/or failed to warn of the dangerous condition and by reason of the foregoing acts or omissions, any or all, proximately caused the decedent plaintiff, ETHEL FASULO, to trip and fall proximately causing the decedent plaintiff, ETHEL

FASULO, to sustain severe and traumatic personal injuries, and ultimately her death.

8. The accident in question and the injuries sustained by the decedent plaintiff, ETHEL FASULO, related thereto, did occur without any negligence on the part of the decedent plaintiff, ETHEL FASULO, which would bar her recovery against the defendants in the within cause of action.

9. By reason of the aforesaid, as a result of her severe and traumatic personal injuries, the decedent plaintiff, ETHEL FASULO, was severely and permanently injured, suffered, great pain and anguish, pain and suffering, was confined for a period of time, became, incapacitated from continuing her usual course of conduct, was obliged, to incur large expenses in the care and treatment of her aforesaid injuries and was otherwise injured, damaged and restriction in her bodily movements, and ultimately died.

WHEREFORE, the plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO, demands judgment against the defendants, TOWNSHIP OF MORRISTOWN, MORRISTOWN SHADE TREE COMMISSION, ABC COMPANY 1-10 (said names being fictitious and unknown) and/or JOHN DOES 1-10 (said names being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and/or JOE DOES 1-10 (said names being fictitious and unknown), CHURCH OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, GHI COMPANY 1-10 (said names being fictitious and unknown) and/or JIM DOES 1-10 (said names being fictitious and unknown), JKL COMPANY 1-10 (said names being fictitious and unknown), and/or JANE DOES 1-10 (said names being fictitious and unknown), jointly, severally or alternatively, individually for damages, together with interest and cost of suit.

COUNT TWO
(Survival Action)

1. Plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO, repeats and realleges all of the allegations of the First Count and makes same part hereof as though set forth at length herein and in addition thereto, she alleges the following.

2. Defendants were guilty of other acts of negligence and/or carelessness which was the proximate cause of the decedent plaintiff, ETHEL FASULO'S harm, injury damage, and death in which the decedent plaintiff, ETHEL FASULO was caused to suffer greatly prior to her death.

3. This action is being commenced within two years of the date of death of the decedent plaintiff, ETHEL FASULO.

4. Plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO seeks as benefits for which the Estate is entitled pursuant to the Survival Act of the State of New Jersey, *N.J.S.A. 2A:15-3, et seq.*, its amendments and supplements.

WHEREFORE, the plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO, demands judgment against the defendants, TOWNSHIP OF MORRISTOWN, MORRISTOWN SHADE TREE COMMISSION, ABC COMPANY 1-10 (said names being fictitious and unknown) and/or JOHN DOES 1-10 (said names being fictitious and unknown), DEF COMPANY1-10 (said names being fictitious and unknown) and/or JOE DOES 1-10 (said names being fictitious and unknown), CHURCH OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, GHI COMPANY 1-10 (said names being fictitious and unknown) and/or JIM DOES 1-10 (said

names being fictitious and unknown), JKL COMPANY 1-10 (said names being fictitious and unknown), and/or JANE DOES 1-10 (said names being fictitious and unknown), jointly, severally or alternatively, individually for damages, together with interest and cost of suit.

COUNT THREE
(Wrongful Death Action)

1. Plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO, repeats and realleges all of the allegations of the previous Counts and makes same part hereof as though set forth at length herein and in addition thereto, she alleges the following.

2. This action is being instituted and maintained on behalf of the Estate of Ethel Fasulo and her next of kin to prosecute both her survival claim and Wrongful Death Claim.

3. This action is being instituted and maintained for their benefit pursuant to the provisions of N.J.S.A. 2A:31-1, *et seq.*, commonly known as the Wrongful Death Act.

4. This action is being commenced within two years of the date of death of the decedent plaintiff, ETHEL FASULO.

5. Decedent plaintiff, ETHEL FASULO left survivors next of kin.

6. As a direct and proximate cause of defendants' individual and collective negligence and/or other misconduct as described above, decedent plaintiff, ETHEL FASULO suffered a premature and untimely death.

7. As a result of Ethel Fasulo's death, her survivors suffered and will in the future suffer harm, loss of society, and companionship, and emotional and economic losses all to their detriment.

8. Plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL

FASULO is also entitled to recover on behalf of the beneficiaries under the Wrongful Death Act, *N.J.S.A. 2A:31-1, et seq.*, economic damages, including but not limited to, medical bills, loss of services, and loss of advice, guidance, and companionship from the decedent plaintiff between the time of her injury and her death, as well as, funeral and burial expenses.

9. The aforementioned acts of the defendants named and/or referenced in this Complaint were negligent and/or careless, and were otherwise negligent.

10. As a direct and proximate result of the defendants' acts and omissions, individually and collectively, Ethel Fasulo suffered a premature, untimely death.

WHEREFORE, the plaintiff, JANICE A. ALLEN, as Executrix of the ESTATE OF ETHEL FASULO, demands judgment against the defendants, TOWNSHIP OF MORRISTOWN, MORRISTOWN SHADE TREE COMMISSION, ABC COMPANY 1-10 (said names being fictitious and unknown) and/or JOHN DOES 1-10 (said names being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and/or JOE DOES 1-10 (said names being fictitious and unknown), CHURCH OF ASSUMPTION OF BLESSED VIRGIN MARY, DIOCESE OF PATERSON, GHI COMPANY 1-10 (said names being fictitious and unknown) and/or JIM DOES 1-10 (said names being fictitious and unknown), JKL COMPANY 1-10 (said names being fictitious and unknown), and/or JANE DOES 1-10 (said names being fictitious and unknown), jointly, severally or alternatively, individually for damages, together with interest and cost of suit.

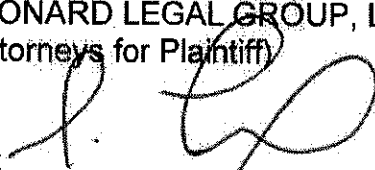
JURY DEMAND

Plaintiff(s) hereby demand(s) a Trial by jury on all issues set forth herein.

DESIGNATION OF TRIAL COUNSEL

Please take notice that SCOTT G. LEONARD, ESQ. of the Leonard Legal Group, LLC, is hereby designated trial counsel on the within matter.

LEONARD LEGAL GROUP, LLC
(Attorneys for Plaintiff)

By: 

SCOTT G. LEONARD, ESQ.

Dated: August 10, 2020

DEMAND FOR CERTIFIED ANSWERS TO UNIFORM INTERROGATORIES AND OTHER RELATED DOCUMENTS WITHIN SIXTY (60) DAYS OF SERVICE OF THE WITHIN COMPLAINT IN LIEU OF SERVICE OF SAME PURSUANT TO RULE 4:17-1,2 and 4 et seq. and DEMAND FOR INSURANCE POLICES PURSUANT TO RULE 4:10-2(b)

Pursuant to Rule 4:17-1, 2 and 4 et seq., the plaintiff hereby demands that the defendants upon whom this pleading is served, furnish fully responsive and certified answers to Uniform Interrogatories, Rules of Court, Appendix II, Form C and C2, together with the attachments required therein, within sixty (60) days of the service of the within Complaint, together with copies of the applicable insurance policies available to the named defendants herein pursuant to Rule 4:10-2(b).

LEONARD LEGAL GROUP, LLC
(Attorneys for Plaintiff)

By: 

SCOTT G. LEONARD, ESQ.

Dated: August 10, 2020

PLAINTIFF'S REQUEST FOR NOTICE TO PRODUCE DOCUMENTS

Plaintiff hereby demands full and complete responses to Notice to Produce Documents from defendant(s) to be furnished within the time prescribed by the Court to Leonard Legal Group, LLC. located at 165 Washington Street, Morristown, New Jersey 07960.

1. All insurance policies of each defendant in which said defendant is a named insured or an additional insured or under which each defendant is otherwise afforded coverage, relating to the accident which is the subject matter of the within cause of action as well as an indication as to whether said coverage is prime, wrap up, excess, or umbrella coverage.
2. All policies of insurance which provide coverage for employers or employees liability, under a worker's compensation policy or otherwise (if applicable hereto).
3. All written statements, descriptions, statements, records and written accounts of investigation directly or indirectly related to the matter set forth herein not previously supplied.
4. All photographs and diagrams of any person, place or thing which is directly or indirectly related to the matter set forth not previously supplied.
5. Any and all documents containing the names, home and business addresses of all individuals to be contacted as potential witnesses by defendants.
6. All other writings, memoranda, data and/or tangible things which are related directly or indirectly to the incident and damages set forth in this order.
7. Any and all reports compiled by an individual who has been retained as a expert in this matter.
8. All documents relating to the statements of witnesses to the plaintiff's accident; including witnesses who were within sight of hearing of the occurrence or having knowledge from any source as to how it is thought to have occurred.

9. All documents relating to statements of any of the individual parties herein or offices or managing agents of any corporate parties herein in connection with the plaintiff's accident.
10. All documents relating to the manner of the occurrence, the events giving rise or leading up to it and cause or causes thereof.
11. All documents relating to the conditions at the scene of the occurrence (e.g., where appropriate, surface, weather, construction, warning signs).
12. All documents relating to the contractual responsibility if any, by one or more of the defendants herein, and any other party or third party with respect to conditions existing at the scene of the occurrence and the time thereof.
13. All documents relating to any agreement, understanding, or relationship between an party herein and any other party or a third party including the principal, agent or employee which in whole or in part, is alleged to have established any responsibility, joint or sole, for any of the conduct allegedly committed any defendant with respect to the subject matter of this action.
14. All documents relating to complaints or any other notification of potentially dangerous conditions at the scene of the occurrence and received by any party herein prior thereto.
15. All documents and the nature of any expert reports concerning the explanation for or cause of the occurrence.
16. All documents relating to any facts on the basis of which is asserted that the conduct of plaintiff (or where applicable, the decedent) contributed to the happening of the occurrence or the injuries or losses, allegedly suffered as a result thereof.
17. All documents relating to the identity of any statute or ordinance or governmental code which it is alleged was violated by any party herein.

18. All documents sent by you or received by you from any physician who has examined the plaintiff which relate, regard, or referred to the plaintiff's claim, including without limitation, bills, drafts or reports, telephone messages, and any other form of recorded information.
19. All documents in which you will rely in support of your Answer to plaintiff's Complaint.
20. All documents to which reference may be made in the course of trial.
21. All documents within your possession, custody, or control, relating, regarding or referring to plaintiff's business relationship with the defendant from its inception to the present.
22. All demonstrative evidence to which reference may be made at the time of trial.
23. All documents relating, regarding, or referring to the plaintiff's background, including without limitation, occupation, criminal and medical background.
24. All statements taken by you of any person relating, regarding, or referring to the facts of this case.
25. Please attach duplicate photographs in the defendant's possession concerning the plaintiff's accident, including the subject premises.
26. Please furnish copy of the defendant's First Report of Accident.
27. Please furnish a copy of any and all recorded statement(s) taken.
28. Please attach complete copies of any and all contracts and/or agreements between the defendants with any third-party contractors or entities, which covers the subject sidewalk at the time of plaintiff's accident.
29. Please attach complete copies of any and all invoices, logbooks, bills, payment ledgers and/or receipts for any and all work performed by any third-party contractors or entities regarding any and all inspection, installation, maintenance, and/or repair of the

subject tree and sidewalk.

30. Complete copies of any and all correspondence between the defendants, including any and all any third-party contractors or entities were responsible for inspection, installation, maintenance, and/or repair of the subject sidewalk and tree regarding the plaintiff's accident.

31. Please attach complete copies of any and all contracts and/or agreements between the defendants with any third-party maintenance company, which covers the subject property at the time of plaintiff's accident.

32. Please attach complete copies of any and all invoices, logbooks, bills, payment ledgers and/or receipts for any and all work performed by any third party contractor and/or maintenance company that was responsible to install, maintain, inspect, and repair the subject exterior gutters on the subject property for the last ten (10) years, including the date of the plaintiff's accident.

33. Complete copies of any and all correspondence between the defendants, including any and all third-party maintenance company was responsible to install, maintain, inspect, and repair the subject sidewalk on the subject property regarding the plaintiff's accident.

34. Complete copies of any and all correspondence between the defendants with any governmental entity regarding the plaintiff's accident.

35. Complete list of any and all of defendant's personnel or employees who were responsible for the inspection, installation, maintenance, and/or repair and/or remediation of the subject sidewalk and tree within the last ten (10) years at subject premises where plaintiff fell.

36. Complete list of all claims and/or complaints against the defendants in the last ten (10) years alleging personal injury at the subject premises.

37. Copies of any and all Complaints, Answers, discovery, deposition transcripts, expert reports, settlement agreements, releases, and/or judgements in connection with any and all personal injury claims against the defendants within the last ten years.

38. Copies of any and all information regarding the repairs that were made to the subject sidewalk before and after plaintiff's fall.

LEONARD LEGAL GROUP, LLC
(Attorneys for Plaintiff)

By: 

SCOTT G. LEONARD, ESQ.

Dated: August 10, 2020

CERTIFICATION

Pursuant to the requirements of Rule 4:5-1, (NOTICE OF OTHER ACTIONS), I, the undersigned, do hereby certify, to the best of my knowledge, information and belief, that except as hereinafter indicated, the subject matter of the controversy referred to in the within pleading is not the subject of any other Cause of Action pending in any other Court, or of a pending Arbitration Proceeding, nor is any other Cause of Action or Arbitration Proceeding contemplated:

1. OTHER ACTIONS PENDING?.....YES _____ NO X _____

A. If YES-Parties to other Pending Actions. (See Attachment)

B. In my opinion, the following parties should be joined in within pending Cause of Action. (See Attachment)

2. OTHER ACTIONS CONTEMPLATED?.....YES _____ NO X _____

A. If YES-Parties contemplated to be joined, in other Cause of Action. (See Attachment)

3. ARBITRATION PROCEEDINGS PENDING?.....YES _____ NO X _____

A. If YES-Parties to Arbitration Proceedings. (See Attachment)

B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings. (See Attachment)

4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED?..YES _____ NO X _____

A. If YES-Parties contemplated to be joined to Arbitration Proceedings. (See Attachment)

In the event that during the pendency of the within Cause of Action, I shall become aware of any changes as to any facts stated herein, I shall file an Amended Certification and serve a copy thereof on all other parties (or their attorneys) who have appeared in said Cause of Action.

LEONARD LEGAL GROUP, LLC
(Attorneys for Plaintiff)

By: _____

SCOTT G. LEONARD, ESQ.

Dated: August 10, 2020

CERTIFICATION ATTACHMENT

1. OTHER ACTIONS PENDING?

A. If YES-Parties to other Pending Actions.

B. In my opinion, the following parties should be joined in the within pending Cause of Action.

2. OTHER ACTION CONTEMPLATED?

A. If YES-Parties contemplated to be joined in other Cause of Action.

3. ARBITRATION PROCEEDINGS PENDING?

A. If YES-Parties to Arbitration Proceedings.

B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings.

4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED?

A. If YES-Parties contemplated to be joined to Arbitration proceedings.

WHEN APPLICABLE, (in connection with Automobile Accident Cases), IT IS CONTEMPLATED THAT A CLAIM FOR ARBITRATION WILL BE FILED AGAINST ANY PARTY WHO IS UNINSURED OR IS UNDER-INSURED.

Dated: August 10, 2020
(Cert. 4:5-1 Attachment)

Civil Case Information Statement

Case Details: MORRIS | Civil Part Docket# L-001597-20

Case Caption: ALLEN JANICE VS TOWNSHIP OF MORRISTOWN

Case Initiation Date: 08/10/2020

Attorney Name: SCOTT GARY LEONARD

Firm Name: LEONARD LEGAL GROUP LLC

Address: 165 WASHINGTON STREET

MORRISTOWN NJ 07960

Phone: 9739841414

Name of Party: PLAINTIFF : Allen, Janice, A

Name of Defendant's Primary Insurance Company

(if known): Unknown

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: Janice A Allen? 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)*

08/10/2020

Dated

/s/ SCOTT GARY LEONARD

Signed

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	CUMBERLAND COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Broad & Fayette Sts., P.O. Box 615 Bridgeton, NJ 08302 LAWYER REFERRAL (856) 692-6207 LEGAL SERVICES (856) 451-0003	MERCER COUNTY: Deputy Clerk of the Superior Court Local Filing Office, Courthouse 175 S. Broad Street, P.O. Box 8068 Trenton, NJ 08650 LAWYER REFERRAL (609) 585-6200 LEGAL SERVICES (609) 695-6249	SALEM COUNTY: Deputy Clerk of the Superior Court 92 Market St., P.O. Box 18 Salem, NJ 08079 LAWYER REFERRAL (856) 935-5628 LEGAL SERVICES (856) 451-0003
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	ESSEX COUNTY: Deputy Clerk of the Superior Court 50 West Market Street Room 131 Newark, NJ 07102 LAWYER REFERRAL (973) 622-6207 LEGAL SERVICES (973) 624-4500	MIDDLESEX COUNTY: Deputy Clerk of the Superior Court Administration Building Third Floor 1 Kennedy Sq., P.O. Box 2633 New Brunswick, NJ 08903-2633 LAWYER REFERRAL (732) 828-0053 LEGAL SERVICES (732) 249-7600	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
BURLINGTON COUNTY: Deputy Clerk of the Superior Court Central Processing Office Attn: Judicial Intake First Fl., Courts Facility 49 Rancocas Rd. Mt. Holly, NJ 08060 LAWYER REFERRAL (609) 261-4862 LEGAL SERVICES (609) 261-1088	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 (856) 848-4589 LEGAL SERVICES (856) 848-5360	MONMOUTH COUNTY: Deputy Clerk of the Superior Court Court House 71 Monument Park P.O. Box 1269 Freehold, NJ 07728-1269 LAWYER REFERRAL (732) 431-5544 LEGAL SERVICES (732) 866-0020	SUSSEX COUNTY: Deputy Clerk of the Superior Court Sussex County Judicial Center 43-47 High Street Newton, NJ 07860 LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 383-7400
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 (856) 964-4520 LEGAL SERVICES (856) 964-2010	HUDSON COUNTY: Deputy Clerk of the Superior Court Superior Court-Civil Records Dept Brennan Court House--1st Floor 583 Newark Ave. Jersey City, NJ 07306 LAWYER REFERRAL (201) 798-2727 LEGAL SERVICES (201) 792-6363	MORRIS COUNTY: Deputy Clerk of the Superior Court Civil Division 30 Schuyler Pl., P.O. Box 910 Morristown, NJ 07960-0910 LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 285-6911	UNION COUNTY: Deputy Clerk of the Superior Court 1st Fl., Court House 2 Broad Street Elizabeth, NJ 07207-6073 LAWYER REFERRAL (908) 353-4715 LEGAL SERVICES (908) 354-4340
CAPE MAY COUNTY: Deputy Clerk of the Superior Court 9 N. Main Street Box DN-209 Cape May Court House, NJ 08210 LAWYER REFERRAL (609) 463-0313 LEGAL SERVICES (609) 465-3001	HUNTERDON COUNTY: Deputy Clerk of the Superior Court Civil Division 65 Park Avenue Flemington, NJ 08822 LAWYER REFERRAL (908) 735-2611 LEGAL SERVICES (908) 782-7979	OCEAN COUNTY: Deputy Clerk of the Superior Court Court House, Room 119 118 Washington Street Toms River, NJ 08754 LAWYER REFERRAL (732) 240-3666 LEGAL SERVICES (732) 341-2727	WARREN COUNTY: Deputy Clerk of the Superior Court Civil Division Office Court House 413 Second Street Belvidere, NJ 07823-1500 LAWYER REFERRAL (908) 267-5882 LEGAL SERVICES (908) 475-2010
		PASSAIC COUNTY: Deputy Clerk of the Superior Court Civil Division Court House 77 Hamilton St. Paterson, NJ 07505 LAWYER REFERRAL (973) 278-9223 LEGAL SERVICES (973) 345-7171	

Note: Adopted July 13, 1994, effective September 1, 1994; amended June 28, 1996, effective September 1, 1996; address/phone information updated July 1, 1999, effective September 1, 1999; amended July 12, 2002 to be effective September 3, 2002; amended July 27, 2006 to be effective September 1, 2006.