LEONARD LEGAL GROUP, LLC

ATTORNEYS AT LAW
165 WASHINGTON STREET
MORRISTOWN, NEW JERSEY 07960
(973) 984-1414
FAX NO. (973) 984-2599
WWW.LEONARDLAWYERS.COM

SCOTT G. LEONARD*
*CERTIFIED BY THE SUPREME COURT OF NEW JERSEY AS A CIVIL TRIAL ATTORNEY
FATIMA LEONARD
OF COUNSEL:
PAMELA ANEVSKI

841 FRANKLIN AVENUE, UNIT 6
FRANKLIN LAKES, NJ 07417
PLEASE REPLY TO MORRISTOWN

Received
JAN 2 2020
Morristown Administration

December 22, 2019

Via Certified Mail R/R/R
& Regular Mail

Hanover Township
Joseph A. Giorgio, Town Clerk
1000 Route 10
Whippany, NJ 07981

Hanover Township Dept.of Public Works
25 N Jefferson Road
Whippany, NJ 07981-0250

State of New Jersey
Department of Law and Public Safety
Division of Law
Richard J. Hughes Justice Complex
Market & New Warren Streets
P.O. Box 116
Trenton, New Jersey 08536-0116

Shade Tree Commission
Morristown Town Hall
200 South Street
Morristown, NJ 07960

Hanover Township Shade Tree Comm.
1000 Route 10
P.O. Box 250
Whippany, New Jersey 07981

County of Morris
Board of Freeholders
Administration & Records Bldg
Court Street
P.O. Box 900
Morristown, New Jersey 07963

Morris County Shade Tree Managament
120 E. Hanover Avenue
Cedar Knolls, New Jersey

RE: Our Client/Claimant: Elaine Cassinis
Date of Accident: October 15, 2019

TITLE 59 NOTICE

Dear Sir/Madam:

Please be advised our law firm represents Elaine Cassinis in connection with the above matter. Ms. Cassinis fell on a dangerous condition on the sidewalk located at or near 228 Ridgedale Avenue, Cedar Knolls, New Jersey.

We are also enclosing a completed "Title 59 Notice".

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PLEASE REPLY TO MORRISTOWN

Will you kindly have the appropriate claims representatives contact our office to discuss this claim. We are attaching photos of the area that were taken after the fall & after someone from the town painted the area to alert other pedestrians. **Please be advised that the paint was not present at the time of our client's fall.**

In the event there are any other entity(ies) responsible for the subject area, please advise our office immediately.

If you have any questions, please do not hesitate in contacting our office.

Very truly yours,
LEONARD LEGAL GROUP, LLC

BY: _____
SCOTT G. LEONARD, ESQ.

SGL/jh
Encl.

TITLE 59 NOTICE OF CLAIM

Claimant: Elaine Cassinis

Date of Birth: [redacted]

Soc. Sec. No.: [redacted]

Address: [redacted]

If notices and correspondence in connection with this claim are to be sent to a person other than the claimant, complete below.

Name: Leonard Legal Group, LLC

Mailing Address: 165 Washington Street, Morristown, New Jersey 07960

Relationship to this claimant: Attorneys for Claimant.

The occurrence which gave rise to this accident:

Date: On or about October 15, 2019 **Time:** 4:07 P.M. (approx.)

Describe the location or place of the accident or occurrence:

At and/or in front of the premises commonly known as 228 Ridgedale Avenue, Cedar Knolls, New Jersey. We are attaching photos of the area that were taken after the fall & after someone from the town painted the area to alert other pedestrians. **Please be advised that the paint was not present at the time of our client's fall.**

Describe your accident facts:

On April 5, 2019, the Claimant, Elaine Cassinis, was walking on the sidewalk on or near, 228 Ridgedale Avenue, Cedar Knolls, NJ. While walking in a careful and prudent manner, claimant was caused to trip and fall on a raised and dangerous sidewalk, sustaining serious personal injuries

Plaintiff alleges that the defendants, State of New Jersey, County of Morris, Hanover Township, Morris County Shade Tree Commission, Hanover Township Public Works, ABC Company (said named being names of entities unknown and fictitious), individually or through their respective agents, servants and employees, by their servants, agents or employees, were careless and negligent in the ownership, leasing, construction, maintenance, operation, control, repair, cleaning, and inspection of the aforesaid

premises including a certain sidewalk and/or curb that was broken and/or raised and/or deteriorating in the aforesaid sidewalk and/or curb located therein and thereon, and the appurtenances thereto, 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 plaintiff, Elaine Cassinis, to trip and fall.

Plaintiff also alleges that the defendants failed to properly maintain the subject sidewalk and allowed a dangerous condition to exist. Plaintiff reserves the right to amend this notice upon additional information.

State the name and address of the Municipality or Agency that you claim caused your damage:

Hanover Township
Joseph A. Giorgio, Town Clerk
1000 Route 10
Whippany, NJ 07981

Hanover Township Dept.of Public Works
25 N Jefferson Road
Whippany, NJ 07981-0250

State of New Jersey
Department of Law and Public Safety
Division of Law
Richard J. Hughes Justice Complex
Market & New Warren Streets
P.O. Box 116
Trenton, New Jersey 08536-0116

Shade Tree Commission
Morristown Town Hall
200 South Street
Morristown, NJ 07960

Hanover Township Shade Tree Comm.
1000 Route 10
P.O. Box 250
Whippany, New Jersey 07981

County of Morris
Board of Freeholders
Administration & Records Bldg
Court Street
P.O. Box 900
Morristown, New Jersey 07963

Morris County Shade Tree Managament
120 E. Hanover Avenue
Cedar Knolls, New Jersey

John Cote: Allstate Insurance
228 Ridgedale Avenue
Cedar Knolls, New Jersey

Sheet Metal Inc
228 Ridgedale Avenue
Cedar Knolls, New Jersey

Michael J. Raushi
248 Rock Crest Drive
Henryville, PA 18332

State the names of Municipal employees whom you claim were at fault, including the department they are employed with:

Servants Agent's were employees of the following entities:

(The names of said Governmental or Municipal employees are not presently known to claimant).

State in detail each and every negligent or wrongful act of the Municipality and Municipal employees which caused your damage of injury:

See accident facts referred to above.

State the name and address of all witnesses to this accident:

To be supplied.

Please indicate if this is a claim for:

Bodily Injury (X)

Property Damage ( )

Other ( ) Violation of Civil Rights.

Explain:

If you claim bodily injury describe your injuries resulting from this accident or occurrence:

The claimant, Elaine Cassinis, sustained serious personal injuries. Plaintiff reserves the right to amend this notice upon additional information.

Do you claim permanent disability resulting from this injury:

Yes. Plaintiff suffered a permanent injury to her knees, hands, neck and shoulders. Plaintiff reserves the right to amend this notice upon additional information.

If yes, describe the injuries believed to be permanent:

See above.

State the name, address, dates of treatment, type of treatment and amount of charges given by any hospital, doctor or other practitioner rendering medical care or diagnostic services:

Dr. Arvind Patel at MedExpress, 118 E. Hanover Avenue, Cedar Knolls, New Jersey

Dr. James Gibbions, Medical Institute of NJ Family Practice, 11 Saddle Road, Cedar

Knolls, New Jersey.

Twin Boro Physical Therapy, 162 Ridgedale Avenue, Unit 2, Morristown, New Jersey

Dr. Stacey Mevs, Medical Institute of NJ Family Practice, 11 Saddle Road, Cedar Knolls, New Jersey.

State the amount paid or payable by other collateral sources such as health insurance and attach all medical reports and bills incurred to date:

To be supplied.

If you claim loss of income as a result of the injury, state the name and address of the employer, your occupation, rate of pay, dates of absence from work and what amount was paid by your employer. Attach loss income verification from your employer:

To be supplied.

If your loss of income arises from self-employment, attach a calculation indicating the basis of your loss of income along with your last complete year of income tax records.

To be supplied.

Set forth any and all other losses or damages claimed by you:

To be supplied.

If you claim property damage:

Not applicable.

Describe the property damage:

Not applicable.

The present location and time when the property can be inspected:

Not applicable.

Date property acquired:

Not applicable.

Cost of property:

Not applicable.

Value of property:

Not applicable.

Description of damage:

Not applicable.

Has the damage been repaired: Not applicable.

If so, by whom, when and the cost of replacement (attach receipts):

Not applicable.

Set forth in detail all other items of loss or damages claimed by you and the method by which you made the calculation:

To be supplied.

Attach all available receipts which verify the cost of items claimed.

The total amount of your claim:

The amount of the claim at present, without prejudice, for pain and suffering, and/or out-of-pocket expenses and/or permanency (based on an unliquidated amount and subject to revision at a later date) is $1,000,000.00.

Have you made claim against anyone else for any of the losses or expense claimed in this notice:

See above for list of entities placed on notice for the loss and expenses of this claim.

If yes, set forth the names and addresses of all persons and insurance companies against whom you have made such a claim:

To Be Supplied.

State the amount paid by this source: None to date.

Copies of all appraisals and estimates of property damage should be attached with this notice.

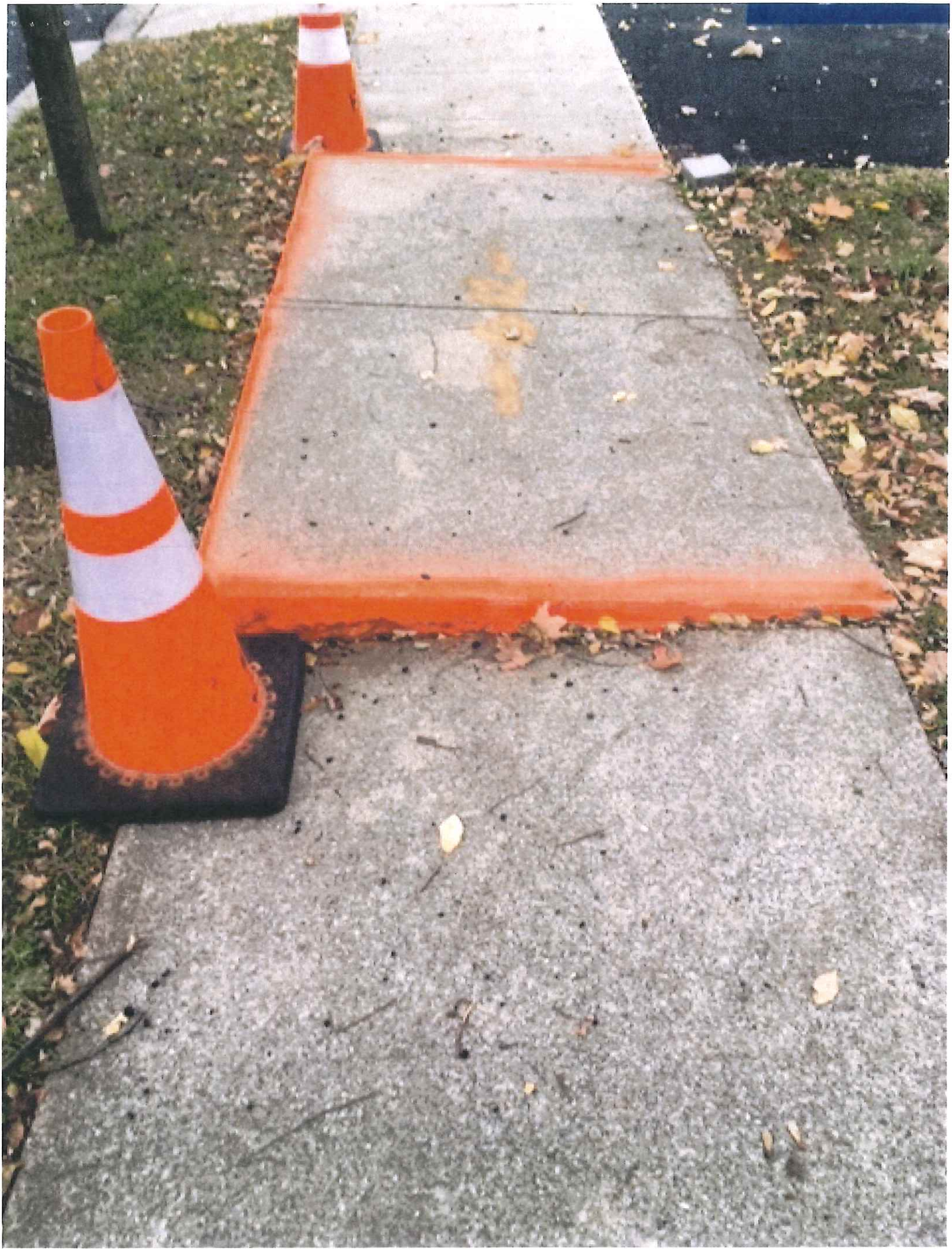
Not applicable.

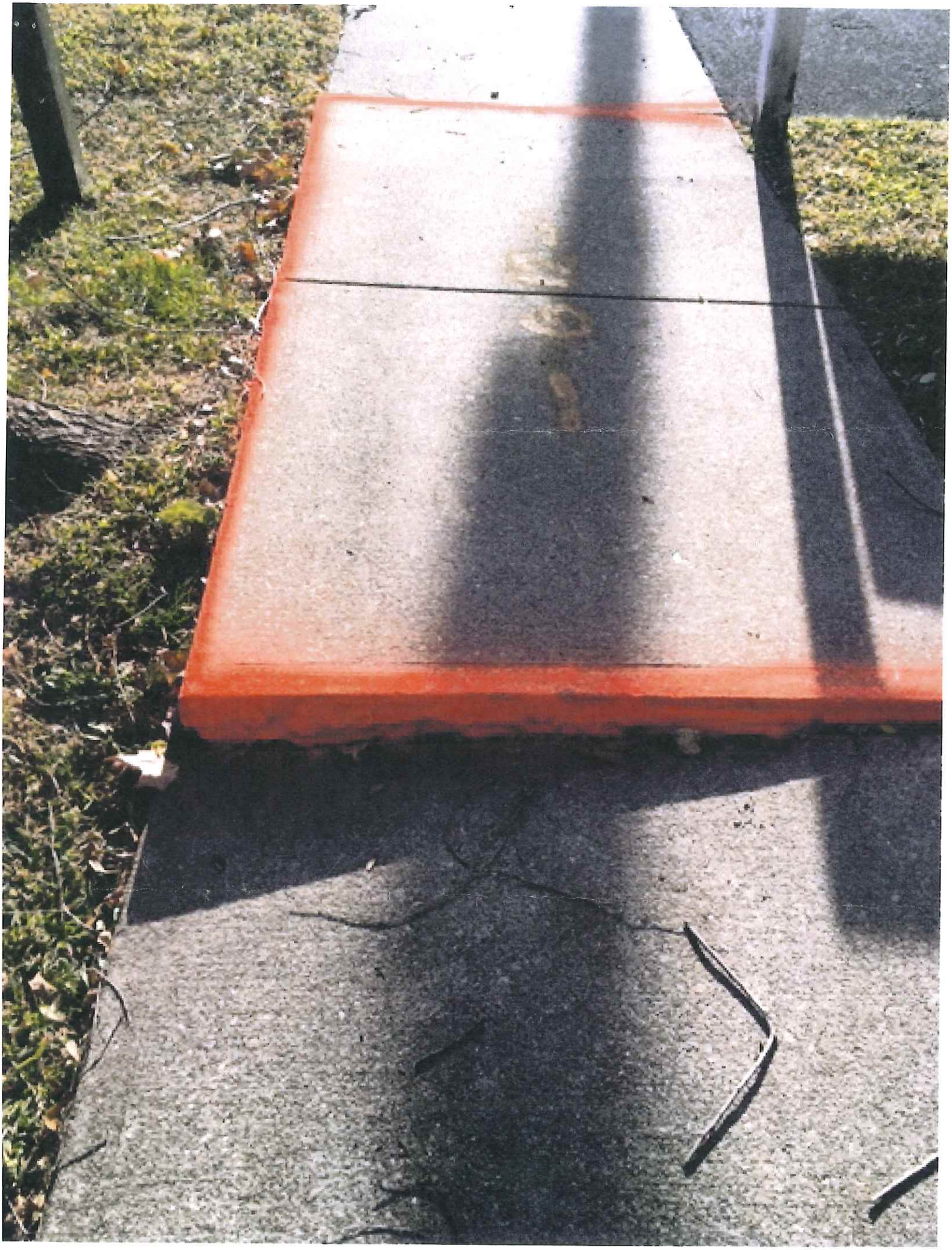
I hereby certify that the foregoing statements made by me are true and that I am aware that if any statement made herein is willfully false or fraudulent, I am subject to punishment provided by law.

LEONARD LEGAL GROUP, LLC
(Attorneys for Claimant)

By: _____
SCOTT G. LEONARD, ESQ.

SGL/jh
CC: Elaine Cassinis





Hanover Township Police Department

1000 Route 10, Whippany, NJ 07981
Phone: 973-428-2512 Fax: 973-428-1543 Mun. Code: 1412

Operations Report

Incident Details:

Case Number	Time Reported	Date Reported	Time Occurred	Date Occurred	Occurrence Between Date / Time of	Time Occurred	Date Occurred	911	Complete
19-32118	16:07	10/15/19		10/15/19					X

Incident Type:

Medical Aid

Incident Location:

Street #	Street Name	Intersection / Cross Street of:
228	Ridgedale Avenue	

Business / Common Location Name

Contact Information: Victim Suspect Complainant Witness Driver Arrest Passenger Missing Involved Other

Code	Contact Name #1	MI	Suffix	Age	Sex	Race	DOB	SSN
Pat	Cassinis, Elaine			[redacted]	F	1B		

Address	Home Phone	Cell Phone
[redacted]		

Code	Contact Name #2	MI	Suffix	Age	Sex	Race	DOB	SSN

Address	Home Phone	Cell Phone

Code	Contact Name #3	MI	Suffix	Age	Sex	Race	DOB	SSN

Address	Home Phone	Cell Phone

Code	Contact Name #4	MI	Suffix	Age	Sex	Race	DOB	SSN

Address	Home Phone	Cell Phone

Property Information:

Value of Stolen Property	Currency	Jewelry	Furs	Clothing	Auto	Misc.	Total
Value of Stolen Property Recovered							

Automobile Information:

	Vehicle Code	Year	Make	Body Type	Color	Registration	State	VIN
1								
2								
3								
4								

Narrative:

Narrative

While on a side job on Ridgedale Ave. by the center driveway to the Morris County Mall, I was approached by Elaine Cassinis. Elaine stated she was out for a walk and tripped on the sidewalk across the street. She pointed out the area in question, which was in front of 228 Ridgedale Ave., and she was walking south at the time. Sgt. Vitanza was working the side job with me and tended to Elaine's injuries which consisted of cuts and scrapes to her knees and palms. I walked across the street and observed the sidewalk where Elaine fell. The sidewalk was raised approximately 4 inches and there is a tree directly adjacent to the sidewalk. It appears over time the tree's roots grew and pushed the sidewalk up.

Officer of Record:	Date:	Other Reports Filed:									Reviewed By:
		MVA	Arrest	DV	DWI	DWIQ	Tow	SD	CI	TRO	
Sgt. Robert Carpenter 764	10/15/19	SHA	Prop.	Evdn	UOF	Prst	Supp	Juv	Bias	Pris	rwilliams

Hanover Township Police Department

1000 Route 10, Whippany, NJ 07981
Phone: 973-428-2512 Fax: 973-428-1543 Mun. Code: 1412

Operations Report

Narrative Continued (Page 2)	Case Number
	19-32118

Evan Spencer, of Hanover Township Engineering, was on scene inspecting work for the side job I was on. I advised him of the incident and he spoke with Elaine as well. They exchanged contact information and Evan would look into the matter to see who is responsible for making any repairs.

Elaine's injuries were bandaged up and she attempted to walk home but was unable to do so. She was offered medical attention but refused. She asked for a ride home, which I provided. Elaine was advised how to obtain a copy of the report.

No further action taken.

Officer of Record:	Date:
Sgt. Robert Carpenter 764	10/15/19