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8-10-18

Gregory D.R. Behringer, Esquire
Attorney ID Number: 016972009
LAUFER, DALENA, CADICINA,
JENSEN & BRADLEY, L.L.C.
23 Cattano Avenue at Chancery Square
Morristown, New Jersey 07960
Tel: (973) 285-1444
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Attorneys for Plaintiff

BARBARA L. HARPER,

Plaintiff,

vs.

**TOWN OF MORRISTOWN; APPLIED
COMPANY/CHANCERY SQUARE;
THE HARTZ GROUP, INC.; JOHN
DOES 1-25 (fictitious names); ABC
COMPANIES 1-25 (fictitious names)
and XYZ CORPORATIONS 1-25
(fictitious names),**

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY

DOCKET NO. MRS-L-001556-18

Civil Action

SUMMONS

The State of New Jersey To The Defendant(s) Named Above:

TOWN OF MORRISTOWN

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.njcourts.gov/forms/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.njcourts.gov/forms/10153_deptyclerklawref.pdf.

Michelle M. Smith

MICHELLE M. SMITH
Clerk of the Superior Court

Dated: August 9, 2018

Name of Defendant to be Served:
Address of Defendant to be Served:

TOWN OF MORRISTOWN
ATT: Mr. Kevin D. Harris, Town Clerk
200 South Street, PO Box 914
Morristown, New Jersey 07963-0914

Directory of Superior Court Deputy Clerk's Offices County Lawyer Referral and Legal Services Offices

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
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

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 Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862

LEGAL SERVICES

(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 482-0618

LEGAL SERVICES

(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
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
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL

(856) 696-5550

LEGAL SERVICES

(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6204

LEGAL SERVICES

(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRAL

(856) 848-4589
LEGAL SERVICES
(856) 848-5360

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

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL

(908) 236-6109
LEGAL SERVICES
(908) 782-7979

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

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court,
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL

(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL

(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL

(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191

LAWYER REFERRAL

(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL

(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL

(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 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 Street
Newton, NJ 07860

LAWYER REFERRAL

(973) 267-5882
LEGAL SERVICES
(973) 383-7400

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

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL

(908) 859-4300
LEGAL SERVICES
(908) 475-2010

Gregory D.R. Behringer, Esquire
Attorney ID Number: 016972009
LAUFER, DALENA, CADICINA,
JENSEN & BRADLEY, L.L.C.
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BARBARA L. HARPER,

Plaintiff,

vs.

**TOWN OF MORRISTOWN; APPLIED
COMPANY/CHANCERY SQUARE;
THE HARTZ GROUP, INC.; JOHN
DOES 1-25 (fictitious names); ABC
COMPANIES 1-25 (fictitious names)
and XYZ CORPORATIONS 1-25
(fictitious names),**

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY

DOCKET NO.

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiff, BARBARA L. HARPER, by way of complaint against the Defendants, Town of Morristown, Applied Company/Chancery Square, The Hartz Group, Inc., John Does 1-25 (fictitious names), ABC Companies 1-25 (fictitious names) and XYZ Corporations 1-25 (fictitious names), says:

THE PARTIES

1. Plaintiff, Barbara L. Harper, at all times relevant hereto, was and is a resident of the Township of Morris, County of Morris, New Jersey.
2. At all times relevant hereto, Defendants, Applied Company/Chancery Square and The Hartz Group, Inc., were owners of the subject property located at 23 Cattano Avenue, Morristown, Morris County, New Jersey.
3. At all times relevant hereto, Defendant, Town of Morristown, was and is a municipal corporation, duly organized and incorporated under the laws of the State of New Jersey, with its principal place of business located at 200 South Street, Morristown, New Jersey 07963 - 0914.
4. At all times relevant hereto, Defendants John Does, ABC Companies and XYZ Corporations are persons and/or business entities that designed, constructed and/or installed a manhole and manhole cover in and upon the public sidewalk upon the premises of 23 Cattano Avenue, Morristown, New Jersey.

JURISDICTION AND VENUE

5. This is a Tort Action for personal injury and damages under which the jurisdiction of this Court is invoked pursuant to N.J. Const. Art. VI, Section 3. Venue is properly laid in accordance with R. 4:3-2(a)(3) in that Plaintiff resides in the County of Morris, State of New Jersey and R. 4:3-2(a)(2) in that Defendant Town of Morristown is a municipal corporation situated in the County in which the cause of action arose.

FACTS COMMON TO ALL COUNTS

6. At all times relevant hereto, the sidewalk which traverses the property line of 23 Cattano Avenue, Morristown, New Jersey, was and still is a much-travelled public walkway in common use by the Plaintiff and by other members of the public generally.

7. At all times relevant hereto, Defendants, John Does 1-25 (fictitious names), Jane Does 1-25 (fictitious names), ABC Companies 1-25 (fictitious names) and XYZ Corporations 1-25 (fictitious names) and/or were and are responsible for the designing, constructing, installing, maintaining, caring, repairing and keeping the aforesaid public sidewalk in a safe condition, free of dangerous and hazardous conditions, including the aforesaid manhole and manhole cover contained within the aforesaid public sidewalk.

8. At all times relevant hereto, a manhole and a manhole cover are situated upon and within the aforesaid sidewalk together with its supporting structure which is located under and within the sidewalk, which structure comprises part of the "tripping hazard" described below.

FIRST COUNT

9. Plaintiff repeats herein each and every Paragraph of the Facts Common to All Counts as though the same were fully set forth at length herein.

10. The aforesaid location is under the jurisdiction of the Defendant, Town of Morristown, and was constructed either by the Defendant Town of Morristown, or by others under its supervision and at its direction in accordance with the Municipal Ordinances of the Town of Morristown, New Jersey. The Public Works Department of the Town of Morristown, according to the Defendant, Town of Morristown website is responsible for several functions, including for the construction and reconstruction, maintenance and repair of all public streets, public sidewalks and

curbs. Under Chapter XVIII, Streets and Sidewalks of the Municipal Ordinances of the Town of Morristown, the Defendant Town, has the responsibility of inspection, supervision and proper installation of public sidewalks. While the Defendant Town endeavors to place certain responsibility upon the owners of abutting real estate, the Defendant Town has a permitting procedure under which all sidewalks and curbing are to be constructed, reconstructed and repaired in a manner and with such materials as may be specified by regulation or other law. See, Section 18-2, specifically 18-2.1 of the Municipal Code. Prior to any such construction, reconstruction or repair a permit is to be obtained in accordance with the applicable Section. The Defendant Town of Morristown, Department of Code Enforcement, Division of Property Maintenance and Inspections shall enforce the provisions of the Section and other laws relating to the repair and/or replacement of sidewalk in the Defendant Town of Morristown found to be in disrepair. See, Section 18-2, supra.

11. Consistent with the responsibility under Title 59 of the New Jersey Tort Claims Act and Chapter XVIII, Streets and Sidewalks of the Municipal Ordinances of the Town of Morristown, the Plaintiff contends that the Defendant Town failed to properly install and/or supervise the installation of the sidewalk in question by others such that the Defendant Town created a tripping hazard. The aforesaid sidewalk has a manhole and manhole cover within and upon it and when the manhole and manhole cover were installed, either by, at or under the supervision of Defendant, Town of Morristown, the sidewalk slab in question containing the manhole cover was left raised 1-1/2 inches above the abutting sidewalk slabs thereby creating a lip or ledge. Accordingly, the Plaintiff contends that a tripping hazard was created which is a dangerous condition under N.J.S.A. 59:4-1(a) of the Tort Claims Act. A dangerous condition means a condition of the property that creates a substantial risk of injury when such property is

used with due care and in a manner in which it is reasonably foreseeable that it will be used. N.J.S.A. 59:4-1(a). Plaintiff contends in this case, that the Defendant Town of Morristown is liable for the injury caused to her because of the tripping condition created within the subject property. Plaintiff contends that the property was in a dangerous condition before, at and during the time of her injury and that the injury was proximately caused by the dangerous condition. Further, the dangerous condition created a reasonably foreseeable risk of the kind of injury which has occurred and that the Defendant Town of Morristown had actual and/or constructive notice of the dangerous condition, a sufficient time prior to the injury to have taken measures to protect against the dangerous condition. See, N.J.S.A. 59:4.3. Plaintiff contends in this case, after the installation of the manhole and the manhole cover, no action was taken by the Defendant Town to make, or cause to be made, level and even the sidewalk area and to eliminate the tripping hazard. Rather, Plaintiff contends the raised concrete slab remained in that condition and continued until the time of the accident and afterward, all the while continuing to present a risk to pedestrians walking upon the public sidewalk in this area of Cattano Avenue in the Town of Morristown. Further, the Plaintiff contends that the failure of the Defendant Town to take corrective action was palpably unreasonable under the circumstances.

12. Under N.J.S.A. 59:4-3(a), a public entity shall be deemed to have had actual notice of a dangerous condition within the meaning of Subsection B of Section 59.4-2, if it had actual knowledge of the existence of the condition and knew or should have known of its dangerous character. Plaintiff contends in this case, clearly when the Municipal Inspectors inspected the installation of the manhole and manhole cover and saw that the raised slab (or should have seen the raised slab) there was no question that the Defendant Town had actual knowledge of the dangerous condition. If the Defendant Town of Morristown Inspectors did no inspection after the

installation of the manhole, manhole cover and sidewalk, then Plaintiff contends that the Defendant Town is negligent in failing to properly supervise and inspect the installation and construction of the sidewalk.

13. Further, under N.J.S.A. 59:4-3(d), the Defendant Town of Morristown is to be deemed to have had constructive notice of the dangerous condition within the meaning of Subsection 59:4-2 as the Plaintiff will establish that this condition has existed for such a period of time and was of such an obvious nature that the Defendant, Town of Morristown, in the exercise of due care, should have discovered the condition, the tripping hazard, and its dangerous character. Plaintiff contends under the circumstances described herein that the condition was created by the Defendant, Town of Morristown, or was created and/or allowed under its supervision and at the direction of the Defendant, Town of Morristown and thus the Defendant Town of Morristown was and is responsible for this dangerous condition which caused the Plaintiff's injury by causing her to fall and which condition existed for a significant period of time.

14. As stated, Defendant, Town of Morristown, had actual and/or constructive notice of the dangerous and hazardous condition.

15. Defendant, Town of Morristown, failed to correct, repair or remedy the condition of the sidewalk or failed to take remedial measures to eliminate the tripping hazard.

16. On or about March 9, 2017, Plaintiff, Barbara L. Harper, was walking along and upon the sidewalk in front of 23 Cattano Avenue, Morristown, New Jersey.

17. Suddenly and without warning, the Plaintiff tripped on the uneven and raised sidewalk lip and fell and thereby did sustain serious and permanent injuries as a result of the aforesaid negligence of the Defendant, Town of Morristown.

18. The Defendant Town of Morristown, was negligent in that it:
- (a) failed to keep the premises in a safe condition;
 - (b) failed to exercise proper care;
 - (c) created and/or caused a dangerous and hazardous condition to exist;
 - (d) failed to provide proper safeguards and warnings on the property;
 - (e) failed to provide proper, safe and clear access for persons allowed and invited to use the sidewalk;
 - (f) failed to take remedial measures to eliminate the tripping hazard; and
 - (g) was otherwise negligent in the construction, maintenance, and/or operation of the aforesaid sidewalk and premises.

19. As a direct and proximate result of the Defendant's negligence, Plaintiff, Barbara L. Harper was caused to suffer and sustained severe and disabling injuries and has been and will in the future be caused to obtain medical treatment and has been and will in the future be caused to lose time from her normal pursuits.

20. On or about March 13, 2017, Plaintiff, Barbara L. Harper, filed a Tort Claim Act Notice as required by the Statutes of New Jersey on Defendant, Town of Morristown.

WHEREFORE, Plaintiff, Barbara L. Harper, demands judgment against the Defendant, Town of Morristown for damages, interest, costs of suit and such other and further relief as the Court deems just and appropriate.

SECOND COUNT

21. Plaintiff repeats herein each and every Paragraph of the First Count as though the same were fully set forth at length herein.

22. The Defendant, Applied Company/Chancery Square with offices at 400 Plaza Drive, Secaucus, New Jersey, along with Defendant, The Hartz Group, Inc., were the owners of property located at 23 Cattano Avenue in the Town of Morristown, New Jersey 07960.

23. On or about March 9, 2017, Plaintiff Barbara L. Harper was walking along and upon the sidewalk in front of 23 Cattano Avenue, Morristown, New Jersey,

24. Suddenly and without warning, the Plaintiff tripped on the uneven and raised sidewalk lip and fell and thereby did sustain serious and permanent injuries as a result of the negligence of these Defendants in failing to properly install, construct and/or maintain the aforesaid sidewalk in a reasonably safe condition as the Defendants had actual and/or constructive notice of the dangerous and hazardous condition hereinabove described.

25. Defendants failed to correct, repair or remedy the condition of the sidewalk thereby continuing to maintain the aforesaid sidewalk in its dangerous and hazardous condition.

26. The Defendants, therefore, were negligent in that they:

- (a) failed to keep the premises in a safe condition;
- (b) failed to exercise proper care;
- (c) created and/or caused a dangerous and hazardous condition to exist;
- (d) failed to provide proper safeguards and warnings on the property;
- (e) failed to provide proper safe and clear access for persons allowed and invited to use the sidewalk;
- (f) failed to take remedial measures to eliminate the tripping hazard; and
- (g) were otherwise negligent in the ownership, construction, operation and/or maintenance of the sidewalk upon the premises.

27. As a direct and proximate result of the Defendants' negligence, the Plaintiff, Barbara L. Harper, was caused to suffer and sustain severe and disabling injuries and has been and will in the future be caused to obtain medical treatment and has been and will in the future be caused to lose time from her normal pursuits.

WHEREFORE, Plaintiff, Barbara L. Harper, demands judgment jointly and severally against the Defendants for damages, interest, costs of suit and such other and further relief as the Court deems just and appropriate.

THIRD COUNT

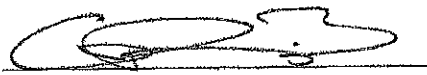
JOINT AND SEVERAL LIABILITY

28. Plaintiff repeats herein each and every Paragraph of the First and Second Counts as though the same were fully set forth at length herein.

29. Plaintiff, Barbara L. Harper, claims that the aforesaid Defendants are jointly and/or severally liable under the Joint Tortfeasors Contribution Law, N.J.S.A. 2A:53A-1 et seq. for the injuries and damages that she has sustained as permitted under the Statutes and Laws of the State of New Jersey.

WHEREFORE, Plaintiff, Barbara L. Harper, demands judgment individually and/or severally against the aforesaid Defendants for damages, interest, costs of suit and such other and further relief as the Court deems equitable and just.

**LAUFER, DALENA, CADICINA,
JENSEN & BRADLEY, LLC**
Attorneys for Plaintiff

By: 

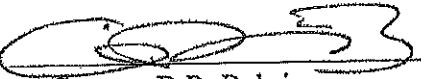
Gregory D.R. Behringer

Dated: 8/2/2018

DEMAND FOR TRIAL BY JURY

Plaintiff, Barbara L. Harper, demands a trial by Jury on all issues so triable.

**LAUFER, DALENA, CADICINA,
JENSEN & BRADLEY, LLC**
Attorneys for Plaintiff

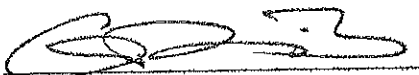
By: 
Gregory D.R. Behringer

Dated: 8/2/2018

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Gregory D.R. Behringer, Esquire, is hereby designated as trial counsel for the Plaintiff.

**LAUFER, DALENA, CADICINA,
JENSEN & BRADLEY, LLC**
Attorneys for Plaintiff

By: 
Gregory D.R. Behringer

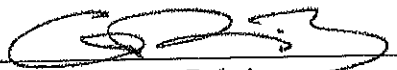
Dated: 8/2/2018

CERTIFICATION PURSUANT TO RULE 4:5-1

I Certify that the matter in controversy is not the subject of any other action pending in any court, nor the subject of a pending arbitration proceeding. Also, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, no other party shall be joined in the within action, and, in the event that there is a change in the facts stated herein, each party has a continuing obligation to file and serve upon all other parties and the court an amended Certification.

**LAUFER, DALENA, CADICINA,
JENSEN & BRADLEY, LLC**
Attorneys for Plaintiff

By: _____


Gregory D.R. Behringer

Dated: 8/2/2018

Civil Case Information Statement

Case Details: MORRIS | Civil Part Docket# L-001556-18

Case Caption: HARPER BARBARA VS TOWN OF MORRISTOWN
Case Initiation Date: 08/08/2018
Attorney Name: GREGORY DAVID RICE BEHRINGER
Firm Name: LAUFER DALENA CADICINA JENSEN & BRADLEY LLC
Address: 23 CATTANO AVE
MORRISTOWN NJ 07960
Phone:
Name of Party: PLAINTIFF : Harper, Barbara, L
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
Hurricane Sandy related? NO
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)? YES

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:

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)*

08/08/2018
Dated

/s/ GREGORY DAVID RICE BEHRINGER
Signed

MORRIS COUNTY
SUPERIOR COURT
COURT STREET
MORRISTOWN NJ 07960

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 656-4100
COURT HOURS 8:30 AM - 4:30 PM

DATE: AUGUST 08, 2018
RE: HARPER BARBARA VS TOWN OF MORRISTOWN
DOCKET: MRS L -001556 18

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 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 MARYANN L. NERGAARD

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (973) 656-4106.

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: GREGORY D. BEHRINGER
LAUFER DALENA CADICINA JENSEN
23 CATTANO AVE
MORRISTOWN NJ 07960

ECOURTS