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JOHN J. SCURA III, Esq. (Attorney ID: 022771993) SCURA, WIGFIELD, HEYER & STEVENS, CAMMAROTA, LLP 1599 HAMBURG TURNPIKE WAYNE, NJ 07470 Tel: (973) 696-8391 Fax: (973) 696-8571 Attorneys for Plaintiff	
BEATRIZ QUIROZ and LOUIS QUIROZ Plaintiffs, v. OLIVE LUCY'S KITCHEN TABLE RESTAURANT, SPEEDWELL AVENUE, LLC, SOUTHWEST MORRIS COUNTY MUNICIPAL UTILITIES AUTHORITY, TOWN OF MORRISTOWN, TOWN OF MORRISTOWN SEWER UTILITY, JOHN DOES 1-100(fictitious defendants), ABC Corporations 1-100 (fictitious defendants), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MORRIS COUNTY Docket No.: MRS-L-000546-18 SUMMONS

From: The State of New Jersey

To: The Defendant Named Above:

The Plaintiff, named above, has filed a lawsuit against you in Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute the 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.) A \$175.00 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.

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If you cannot afford 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 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 /s/

Michelle M. Smith
Clerk of the Superior Court

Dated: March 23, 2018

Name of Defendant to be Served: Town of Morristown Sewer Utility

Address of Defendant to be served: 200 South Street
Morristown, NJ 07960

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

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Civil Division, Direct Filing
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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

JOHN J. SCURA III, ESQ., (022771993) SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA, LLP 1599 HAMBURG TURNPIKE WAYNE, NJ 07470 Tel: (973) 696-8391 Fax: (973) 696-8571 Attorneys for Plaintiffs	
BEATRIZ QUIROZ and LOUIS QUIROZ Plaintiffs, v. OLIVE LUCY'S KITCHEN TABLE RESTAURANT, SPEEDWELL AVENUE, LLC, SOUTHWEST MORRIS COUNTY MUNICIPAL UTILITIES AUTHORITY, TOWN OF MORRISTOWN, TOWN OF MORRISTOWN SEWER UTILITY, JOHN DOES 1-100(fictitious defendants), ABC Corporations 1-100 (fictitious defendants), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MORRIS COUNTY Docket No.: COMPLAINT AND JURY DEMAND

Plaintiffs, Beatriz Quiroz and Louis Quiroz, residing at 247 Terrace Lake Drive in Butler, New Jersey 07405 by way of Complaint say that:

PARTIES

1. Plaintiff, Beatriz Quiroz was walking on the sidewalk on March 25, 2016 in front of Olive Lucy's Kitchen Table Restaurant located at 52 Speedwell Avenue in Morristown, New Jersey.

- IMV2010000490 03/22/2016 12:22:24 PM 19 2016 TRANS ID: EV2010000490
2. Defendant, Olive Lucy's Kitchen Table Restaurant is located at 52 Speedwell Avenue, Morristown, New Jersey 07960 responsible as the commercial business owner for the maintenance of the sidewalk.
 3. Defendant Speedwell Avenue, LLC located at 52 Speedwell Avenue, Morristown, New Jersey 07960 is the owner of the property and responsible for the sidewalk.
 4. Defendant, Southwest Morris County Municipal Utilities Authority located at 19 Saddle Road, Cedar Knolls, New Jersey 07927 responsible for the maintenance of the sidewalk and sewer grate.
 5. Township of Morristown is a public entity located at 200 South Street, first floor, Morristown, New Jersey 07960 responsible for the maintenance of the sidewalk and sewer grate.
 6. Town of Morristown Sewer Utility located at 200 South Street, Morristown, New Jersey 07960 is responsible for the maintenance of the sidewalk and sewer grate.

FIRST COUNT

1. On March 25, 2016, Plaintiff, Beatriz Quiroz, was walking on the sidewalk in front of Olive Lucy's Kitchen Table Restaurant located at 52 Speedwell Avenue in Morristown, New Jersey.

2. At said time and place, Plaintiff Beatriz Quiroz slipped and fell as a result of broken pavement and suffered serious and multiple injuries.

3. At said time and place, a piece of concrete was missing from the corner of the grate which caused Plaintiff, Beatriz Quiroz to fall to the ground.

4. Defendants, Olive Lucy's Kitchen Table Restaurant, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility, owed Plaintiff a duty of reasonable care to fix, keep, maintain, and construct the sidewalk and sewer area of the said premises safe upon which persons travel and walk on, thereby making said area safe from harmful and injurious dangers.

5. Defendants, Olive Lucy's Kitchen Table, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility breached their duty of reasonable care in failing to repair/correct this dangerous condition, in failing to construct the sidewalk and sewer area in a reasonable safe manner, and and/or adequately warn Plaintiff of the danger of the risk of said condition. Their actions were palpably unreasonable. As a direct and proximate result of the aforesaid negligence and recklessness of Defendants, Olive Lucy's Kitchen Table, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility Plaintiff, Beatriz Quiroz was injured, was caused great pain and mental suffering, has incurred and in the future will incur substantial expenses for the treatment of her injuries, has been permanently disabled and not able to perform her usual functions or engage in her usual pursuits, has suffered from injuries to her Left wrist and hip, and in the future will be caused great pain and suffering, to her great loss and damage. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have had a substantial impact on her life, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Plaintiff, Beatriz Quiroz, demands judgment for compensatory damages against Defendants, Olive Lucy's Kitchen Table Restaurant, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility together with interest and costs of suit.

SECOND COUNT

1. Plaintiff repeats each and every allegation of the First Count of the Complaint as if the same were set forth herein at length.

2. Plaintiff, Louis Quiroz, at all times aforesaid was and still is the husband of Plaintiff, Beatriz Quiroz and as such is responsible for her debts and is entitled to her services.

3. As a result of the negligence of Defendants set forth above, Plaintiff, Louis Quiroz, has been and in the future will be substantially deprived of the services of his wife and has in the past and in the future will be required to expend sums of money for medical care as a result of injuries sustained by his wife, Beatriz Quiroz. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Defendant Louis Quiroz, demands judgment for compensatory damages against all Defendants, Olive Lucy's Kitchen Table Restaurant, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility together with interest and costs of suit.

THIRD COUNT

1. Plaintiff repeats each and every allegation of the First and Second Counts of the Complaint as if the same were set forth herein at length.

2. Defendants, John Does, 1-100, fictitious defendants, owed Plaintiff a duty of reasonable care to fix, keep, maintain, and construct the sidewalk and roadway area of the said premises safe upon which persons walk and ride their bicycles, thereby making said area safe from harmful and injurious dangers.

3. Defendants, John Does, 1-100, fictitious defendants, breached their duty of reasonable care in failing to repair/correct this dangerous condition, and/or adequately warn Plaintiff of the danger of the risk of said condition, and/or design/construct the sidewalk and roadway in a reasonably safe manner.

4. Defendants, John Does, 1-100 did construction to the sidewalk and sewer area in a defective and negligent manner resulting in the grossly uneven sidewalk and roadway that caused Plaintiff's injuries.

5. As a direct and proximate result of the aforesaid negligence of these Defendants, Plaintiff, Beatriz Quiroz was injured, was caused great pain and mental suffering, has incurred and in the future will incur substantial expenses for the treatment of her injuries, has been permanently disabled and not able to perform her usual functions or engage in her usual pursuits, has suffered from injuries to her Left wrist and hip, and in the future will be caused great pain and suffering, to her great loss and damage. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Plaintiff, Beatriz Quiroz, demands judgment for compensatory damages against Defendants John Does 1-100, together with interest and costs of suit.

FOURTH COUNT

1. Plaintiff repeats each and every allegation of the First, Second, and Third Counts of the Complaint as if the same were set forth herein at length.

2. Defendants, ABC Corporations 1-100, fictitious defendants, owed Plaintiff a duty of reasonable care to fix, keep, maintain, and construct the sidewalk and sewer area of the said premises safe upon which persons walk and ride their bicycles, thereby making said area safe from harmful and injurious dangers.

3. Defendants, ABC Corporations 1-100, fictitious defendants, breached their duty of reasonable care in failing to repair/correct this dangerous condition, and/or adequately warn Plaintiff of the danger of the risk of said condition, and/or design construct the sidewalk and sewer in a reasonably safe manner.

4. Defendants, ABC Corporations 1-100, fictitious defendants, did construction the sidewalk and sewer area in a defective and negligent manner resulting in the concrete piece breaking off, making the sidewalk and roadway grossly uneven which caused Plaintiff's injuries.

5. As a direct and proximate result of the aforesaid negligence of these Corporate Defendants, Plaintiff, Beatriz Quiroz was injured, was caused great pain and mental suffering, has incurred and in the future will incur substantial expenses for the treatment of her injuries, has been permanently disabled and not able to perform her usual functions or engage in her usual pursuits, has suffered from injuries to her Left wrist and hip, and in the future will be caused great pain and suffering, to her great loss and damage. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Plaintiff, Beatriz Quiroz, demands judgment for compensatory damages against Defendants ABC Corporations 1-100, together with interest and costs of suit.

SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA LLP
Attorneys for Plaintiffs

Dated: March 22, 2018

/s/John J. Scura
By: JOHN J. SCURA III, ESQ.

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues so triable.

SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA, LLP
Attorneys for Plaintiffs

Dated: March 22, 2018

/s/John J. Scura
By: JOHN J. SCURA III, ESQ.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, John J. SCURA III, Esq., is hereby designated as trial counsel herein.

SCURA, W
Attorneys

HEYER, STEVENS & CAMMAROTA, LLP

Dated: March 22, 2018

John J. Scura
JOHN J. SCURA III, ESQ.

RULE

CERTIFICATION

Plaintiffs hereby certify that _____
other action pending in any court a
arbitration proceeding. Plaintiffs fu
contemplated action or arbitration
subject matter of this action and th
be joined in this action.

This controversy is not the subject of any
is not the subject of any pending
that they have no knowledge of any
which is contemplated regarding the
not aware of any other parties who should

SCURA,
Attorneys

HEYER, STEVENS, CAMMAROTA, LLP
Attorneys

Dated: March 22, 2018

John J. Scura
JOHN J. SCURA III, ESQ.

Civil Case Information Statement

Case Details: MORRIS | Civil Part Docket# L-000546-18

Case Caption: QUIROZ BEATRIZ VS OLIVE LUCY'S

KITCHEN TABLE

Case Initiation Date: 03/22/2018

Attorney Name: JOHN J SCURA III

Firm Name: SCURA WIGFIELD HEYER, STEVENS & CAMMAROTA LLP

Address: 1599 HAMBURG TPKE

WAYNE NJ 07470

Phone:

Name of Party: PLAINTIFF : Quiroz, Beatriz

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)? 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:

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)

03/22/2018

Dated

/s/ JOHN J SCURA III

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: MARCH 22, 2018
RE: QUIROZ BEATRIZ VS OLIVE LUCY'S KITCHEN TABLE
DOCKET: MRS L -000546 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 ROSEMARY E. RAMSAY

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: JOHN J. SCURA
SCURA WIGFIELD HEYER, STEVENS
1599 HAMBURG TPKE
WAYNE NJ 07470

ECOURTS

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Michelle M. Smith /s/

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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

JOHN J. SCURA III, ESQ., (022771993) SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA, LLP 1599 HAMBURG TURNPIKE WAYNE, NJ 07470 Tel: (973) 696-8391 Fax: (973) 696-8571 Attorneys for Plaintiffs	
BEATRIZ QUIROZ and LOUIS QUIROZ Plaintiffs, v. OLIVE LUCY'S KITCHEN TABLE RESTAURANT, SPEEDWELL AVENUE, LLC, SOUTHWEST MORRIS COUNTY MUNICIPAL UTILITIES AUTHORITY, TOWN OF MORRISTOWN, TOWN OF MORRISTOWN SEWER UTILITY, JOHN DOES 1-100(fictitious defendants), ABC Corporations 1-100 (fictitious defendants), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MORRIS COUNTY Docket No.: COMPLAINT AND JURY DEMAND

Plaintiffs, Beatriz Quiroz and Louis Quiroz, residing at 247 Terrace Lake Drive in Butler, New Jersey 07405 by way of Complaint say that:

PARTIES

1. Plaintiff, Beatriz Quiroz was walking on the sidewalk on March 25, 2016 in front of Olive Lucy's Kitchen Table Restaurant located at 52 Speedwell Avenue in Morristown, New Jersey.

2. Defendant, Olive Lucy's Kitchen Table Restaurant is located at 52 Speedwell Avenue, Morristown, New Jersey 07960 responsible as the commercial business owner for the maintenance of the sidewalk.
3. Defendant Speedwell Avenue, LLC located at 52 Speedwell Avenue, Morristown, New Jersey 07960 is the owner of the property and responsible for the sidewalk.
4. Defendant, Southwest Morris County Municipal Utilities Authority located at 19 Saddle Road, Cedar Knolls, New Jersey 07927 responsible for the maintenance of the sidewalk and sewer grate.
5. Township of Morristown is a public entity located at 200 South Street, first floor, Morristown, New Jersey 07960 responsible for the maintenance of the sidewalk and sewer grate.
6. Town of Morristown Sewer Utility located at 200 South Street, Morristown, New Jersey 07960 is responsible for the maintenance of the sidewalk and sewer grate.

FIRST COUNT

1. On March 25, 2016, Plaintiff, Beatriz Quiroz, was walking on the sidewalk in front of Olive Lucy's Kitchen Table Restaurant located at 52 Speedwell Avenue in Morristown, New Jersey.

2. At said time and place, Plaintiff Beatriz Quiroz slipped and fell as a result of broken pavement and suffered serious and multiple injuries.

3. At said time and place, a piece of concrete was missing from the corner of the grate which caused Plaintiff, Beatriz Quiroz to fall to the ground.

5. Defendants, Olive Lucy's Kitchen Table, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility breached their duty of reasonable care in failing to repair/correct this dangerous condition, in failing to construct the sidewalk and sewer area in a reasonable safe manner, and and/or adequately warn Plaintiff of the danger of the risk of said condition. Their actions were palpably unreasonable. As a direct and proximate result of the aforesaid negligence and recklessness of Defendants, Olive Lucy's Kitchen Table, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility Plaintiff, Beatriz Quiroz was injured, was caused great pain and mental suffering, has incurred and in the future will incur substantial expenses for the treatment of her injuries, has been permanently disabled and not able to perform her usual functions or engage in her usual pursuits, has suffered from injuries to her Left wrist and hip, and in the future will be caused great pain and suffering, to her great loss and damage. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have had a substantial impact on her life, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Plaintiff, Beatriz Quiroz, demands judgment for compensatory damages against Defendants, Olive Lucy's Kitchen Table Restaurant, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility together with interest and costs of suit.

SECOND COUNT

1. Plaintiff repeats each and every allegation of the First Count of the Complaint as if the same were set forth herein at length.

2. Plaintiff, Louis Quiroz, at all times aforesaid was and still is the husband of Plaintiff, Beatriz Quiroz and as such is responsible for her debts and is entitled to her services.

3. As a result of the negligence of Defendants set forth above, Plaintiff, Louis Quiroz, has been and in the future will be substantially deprived of the services of his wife and has in the past and in the future will be required to expend sums of money for medical care as a result of injuries sustained by his wife, Beatriz Quiroz. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Defendant Louis Quiroz, demands judgment for compensatory damages against all Defendants, Olive Lucy's Kitchen Table Restaurant, Speedwell Avenue, LLC, Southwest Morris County Municipal Utilities Authority, Town of Morristown, Town of Morristown Sewer Utility together with interest and costs of suit.

THIRD COUNT

1. Plaintiff repeats each and every allegation of the First and Second Counts of the Complaint as if the same were set forth herein at length.

2. Defendants, John Does, 1-100, fictitious defendants, owed Plaintiff a duty of reasonable care to fix, keep, maintain, and construct the sidewalk and roadway area of the said premises safe upon which persons walk and ride their bicycles, thereby making said area safe from harmful and injurious dangers.

3. Defendants, John Does, 1-100, fictitious defendants, breached their duty of reasonable care in failing to repair/correct this dangerous condition, and/or adequately warn Plaintiff of the danger of the risk of said condition, and/or design/construct the sidewalk and roadway in a reasonably safe manner.

4. Defendants, John Does, 1-100 did construction to the sidewalk and sewer area in a defective and negligent manner resulting in the grossly uneven sidewalk and roadway that caused Plaintiff's injuries.

5. As a direct and proximate result of the aforesaid negligence of these Defendants, Plaintiff, Beatriz Quiroz was injured, was caused great pain and mental suffering, has incurred and in the future will incur substantial expenses for the treatment of her injuries, has been permanently disabled and not able to perform her usual functions or engage in her usual pursuits, has suffered from injuries to her Left wrist and hip, and in the future will be caused great pain and suffering, to her great loss and damage. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Plaintiff, Beatriz Quiroz, demands judgment for compensatory damages against Defendants John Does 1-100, together with interest and costs of suit.

FOURTH COUNT

1. Plaintiff repeats each and every allegation of the First, Second, and Third Counts of the Complaint as if the same were set forth herein at length.

2. Defendants, ABC Corporations 1-100, fictitious defendants, owed Plaintiff a duty of reasonable care to fix, keep, maintain, and construct the sidewalk and sewer area of the said premises safe upon which persons walk and ride their bicycles, thereby making said area safe from harmful and injurious dangers.

3. Defendants, ABC Corporations 1-100, fictitious defendants, breached their duty of reasonable care in failing to repair/correct this dangerous condition, and/or adequately warn Plaintiff of the danger of the risk of said condition, and/or design construct the sidewalk and sewer in a reasonably safe manner.

4. Defendants, ABC Corporations 1-100, fictitious defendants, did construction the sidewalk and sewer area in a defective and negligent manner resulting in the concrete piece breaking off, making the sidewalk and roadway grossly uneven which caused Plaintiff's injuries.

5. As a direct and proximate result of the aforesaid negligence of these Corporate Defendants, Plaintiff, Beatriz Quiroz was injured, was caused great pain and mental suffering, has incurred and in the future will incur substantial expenses for the treatment of her injuries, has been permanently disabled and not able to perform her usual functions or engage in her usual pursuits, has suffered from injuries to her Left wrist and hip, and in the future will be caused great pain and suffering, to her great loss and damage. Plaintiff's costs of medical treatment and injuries exceed the threshold under N.J.S.A. 59:9-2. Plaintiff's injuries are permanent and substantial, have not healed to function normally and will not heal to function normally with further medical treatment.

WHEREFORE, Plaintiff, Beatriz Quiroz, demands judgment for compensatory damages against Defendants ABC Corporations 1-100, together with interest and costs of suit.

SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA LLP
Attorneys for Plaintiffs

Dated: March 22, 2018

/s/John J. Scura
By: JOHN J. SCURA III, ESQ.

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues so triable.

SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA, LLP
Attorneys for Plaintiffs

Dated: March 22, 2018

/s/John J. Scura
By: JOHN J. SCURA III, ESQ.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, John J. SCURA III, Esq., is hereby designated as trial counsel herein.

SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA, LLP
Attorneys for Plaintiffs

Dated: March 22, 2018

/s/John J. Scura
By: JOHN J. SCURA III, ESQ.

RULE 4: 5-1 CERTIFICATION

Plaintiffs hereby certify that the matter in controversy is not the subject of any other action pending in any court and is likewise not the subject of any pending arbitration proceeding. Plaintiffs further certify that they have no knowledge of any contemplated action or arbitration proceeding which is contemplated regarding the subject matter of this action and that they are not aware of any other parties who should be joined in this action.

SCURA, WIGFIELD, HEYER, STEVENS, CAMMAROTA, LLP
Attorneys for Plaintiffs

Dated: March 22, 2018

/s/John J. Scura
By: JOHN J. SCURA III, ESQ.

Civil Case Information Statement

Case Details: MORRIS | Civil Part Docket# L-000546-18

Case Caption: QUIROZ BEATRIZ VS OLIVE LUCY'S

KITCHEN TABLE

Case Initiation Date: 03/22/2018

Attorney Name: JOHN J SCURA III

Firm Name: SCURA WIGFIELD HEYER, STEVENS &

CAMMAROTA LLP

Address: 1599 HAMBURG TPKE

WAYNE NJ 07470

Phone:

Name of Party: PLAINTIFF : Quiroz, Beatriz

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)? 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:

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)

03/22/2018

Dated

/s/ JOHN J SCURA III

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: MARCH 22, 2018
RE: QUIROZ BEATRIZ VS OLIVE LUCY'S KITCHEN TABLE
DOCKET: MRS L -000546 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 ROSEMARY E. RAMSAY

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: JOHN J. SCURA
SCURA WIGFIELD HEYER, STEVENS
1599 HAMBURG TPKE
WAYNE NJ 07470

ECOURTS