

GOLD, ALBANESE & BARLETTI

58 Maple Avenue
Red Bank, NJ 07701
732-936-9901

Attorneys for Plaintiff, Sandra Pasquariello

SANDRA PASQUARIELLO,

Plaintiff,

v.

**TOWNSHIP OF MORRISTOWN,
WACHOVIA BANK, N.A., 10 DEHART
STREET, LLC., FIORE CONSULTING and
JOHN DOES CORPS. 1-10 (owners being
fictitious as unknown),**

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION MORRIS COUNTY
DOCKET NO.: MRS-L-145-10**

Civil Action

SUMMONS

From the State of New Jersey

To the Defendant(s) named above: **Township 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. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A 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.

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. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: January 28, 2010

/s/ DONALD PHELAN

Superior Court Clerk

Name of Defendant to be served:
Address of the Defendant to be served:

**Township of Morristown
200 South Street
Morristown, NJ 07960**

*\$135.00 FOR CHANCERY DIVISION CASES AND LAW DIVISION CASES

FEB 1 2010

ATLANTIC COUNTY: Deputy Clerk of the Superior Court Civil Division, Direct Filing 1201 Bacharach Blvd., First Floor Atlantic City, NJ 08401 LAWYER REFERRAL: (609) 345-3444 LEGAL SERVICES: (609) 348-4200	GLOUCESTER COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office - Attn: Intake 1 North Broad Street, PO Box 129 Woodbury, NJ 08096 LAWYER REFERRAL: (609) 848-4589 LEGAL SERVICES: (609) 848-5360	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
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	HUDSON COUNTY: Deputy Clerk of the Superior Court Superior Court, Civil Records Dept. Brennan Court House - 1 st Floor 583 Newark Ave. Jersey City, NJ 07306 LAWYER REFERRAL: (201) 798-2727 LEGAL SERVICES: (201) 798-6363	PASSAIC COUNTY: Deputy Clerk of the Superior Court Civil Division - Court House 77 Hamilton Street Paterson, NJ 07506 LAWYER REFERRAL: (973) 278-9223 LEGAL SERVICES: (973) 345-7171
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	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	SALEM COUNTY: Deputy Clerk of the Superior Court 92 Market St., P.O. Box 18 Salem, NJ 08079 LAWYER REFERRAL: (609) 678-8363 LEGAL SERVICES: (609) 451-0003
CAMDEN COUNTY: Deputy Clerk of the Superior Court Civil Processing Office 1 st Fl., Hall of Records - 101 S. Fifth St. Camden, NJ 08103-4001 LAWYER REFERRAL: (609) 964-4320 LEGAL SERVICES: (609) 964-2010	MERCER COUNTY: Deputy Clerk of the Superior Court Local Filing Office, Courthouse 175 S. Broad St., P.O. Box 8068 Trenton, NJ 08659 LAWYER REFERRAL: (609) 585-6200 LEGAL SERVICES: (609) 695-6249	SOMERSET COUNTY: Deputy Clerk of the Superior Court Civil Division Office New Court House, 3 rd Floor P.O. Box 3000 Somerville, NJ 08876 LAWYER REFERRAL: (908) 685-2323 LEGAL SERVICES: (908) 231-0840
CAPE MAY COUNTY: Deputy Clerk of the Superior Court Central Processing Office 9 N. Main Street - Box DN-209 Cape May Court House, NJ 08210 LAWYER REFERRAL: 96090 463-0313 LEGAL SERVICES: (609) 465-3001	MIDDLESEX COUNTY: Deputy Clerk of the Superior Court Administration Building - Third Floor 1 Kennedy Square, P.O. Box 2633 New Brunswick, NJ 08903-2633 LAWYER REFERRAL: (732) 828-0053 LEGAL SERVICES: (732) 249-7600	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
CUMBERLAND COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Broad & Fayette Sts., P.O. Box 615 Bridgeton, NJ 08302 LAWYER REFERRAL: (609) 692-6207 LEGAL SERVICES: (609) 451-0003	MONMOUTH COUNTY: Deputy Clerk of the Superior Court 71 Monument Park P.O. Box 1262 Court House, West Wing Freehold, NJ 07728-1262 LAWYER REFERRAL: (732) 431-5544 LEGAL SERVICES: (732) 866-0020	UNION COUNTY: Deputy Clerk of the Superior Court 1 st Fl., Court House 2 Broad Street Elizabeth, NJ 07207-6073 LAWYER REFERRAL: (908) 353-4715 LEGAL SERVICES: (908) 354-4340
ESSEX COUNTY: Deputy Clerk of the Superior Court 237 Hall of Records 465 Dr. Martin Luther King, Jr. Blvd. Newark, NJ 07102 LAWYER REFERRAL: (973) 622-6207 LEGAL SERVICES: (973) 624-4500	MORRIS COUNTY: Deputy Clerk of the Superior Court Civil Division - Hall of Records P.O. Box 910 Morristown, NJ 07930-0910 LAWYER REFERRAL: (973) 267-5882 LEGAL SERVICES: (973) 285-6911	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

GOLD, ALBANESE & BARLETTI
58 Maple Avenue
Red Bank, New Jersey 07657
(732) 936-9901
Attorneys for Plaintiff, Sandra Pasquariello

RECEIVED AND FILED
SUPERIOR COURT

2010 JAN 14 AM 11:29

CIVIL DIVISION

SANDRA PASQUARIELLO,

Plaintiff,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY
DOCKET NO.: MRS-L- 145-10

v.

CIVIL

TOWNSHIP OF MORRISTOWN,
WACHOVIA BANK, N.A., 10 DEHART
STREET, LLC., FIORE CONSULTING and
JOHN DOES CORPS. 1-10 (owners being
fictitious as unknown),

COMPLAINT, JURY DEMAND,
DESIGNATION OF TRIAL COUNSEL, FIRST
PLEADING CERTIFICATION AND CASE
INFORMATION STATEMENT, DEMAND
FOR INSURANCE INFORMATION,
DEMAND FOR INTERROGATORIES

Defendants.

Plaintiff, Sandra Pasquariello, residing at 3379 Route 46 - Apt. 8D in the Town of Parsippany, County of Morris, in the State of New Jersey, by way of Complaint against Defendants, Township of Morristown, Wachovia Bank, N.A., 10 Dehart Street, LLC., Fiore Consulting and John Does Corps 1 through 10, (said names being fictitious as their identities are presently unknown), say:

FIRST COUNT

1. At all times hereinafter mentioned Plaintiff, Sandra Pasquariello, was and still is a resident of Morris County, residing at 3379 Route 46 - Apt. 8D in the Town of Parsippany, County of Morris, in the State of New Jersey.
2. At all times hereinafter mentioned defendant, Township of Morristown, is a municipal entity organized and existing under the laws of the State of New Jersey with the municipal complex located at 200 South Street, in the Town of Morristown, County of Morris and State of New Jersey.
3. On or about April 7, 2008, at approximately 1:00 p.m., Plaintiff, Sandra Pasquariello, was lawfully walking on the sidewalk in front of Wachovia Bank, N.A. located at 10 Dehart Street in

ALBANESE
BARLETTI
58 Maple Avenue
Red Bank, NJ 07701
(732) 936-9901

the Town of Morristown, County of Morris and State of New Jersey.

4. The portion of sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, was raised and directly and/or indirectly contributed and/or caused Plaintiff, Sandra Pasquariello, to trip and fall thereby sustaining severe and permanent injuries.

5. Defendant, Town of Morristown, was reckless, careless and/or negligent in creating, maintaining and/or failing to warn of the dangerous and/or hazardous condition of the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, was reckless, careless and/or negligent in failing to cordon off the dangerous and/or hazardous condition of the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, and was reckless, careless and/or negligent in failing and/or refusing to inspect and/or repair the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey.

6. As a direct and/or approximate result of the reckless, careless and/or negligent acts and/or omissions of defendant, Town of Morristown, Plaintiff, Sandra Pasquariello, suffered severe, permanent and debilitating injuries; suffered, still suffers and will in the future suffer great pain and anguish; was confined for a period of time and will in the future be so confined; was, still is and will in the future be obligated to undergo medical and other needed care and therapy for her injuries; was, still is and will in the future be required to incur large expenses for the treatment of her said injuries; was, still is and will in the future be incapacitated from continuing her usual course of conduct, activities and/or employment; has suffered, still suffers and will in the future suffer loss of wages; and, was, still is and will in the future be otherwise permanently and severely damaged in her bodily movements, functions and/or activities.

7. Insofar as defendant, Town of Morristown, is concerned, a Notice of Claim pursuant to N.J.S.A. 59:8-1 et seq., was filed and served on the clerk for the defendant, Town of Morristown,

on or about June 19, 2008.

WHEREFORE, Plaintiff, Sandra Pasquariello, demands judgment against the defendant, Town of Hazlet, jointly, severally, or in the alternative, individually for damages, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff, Sandra Pasquariello, repeats and realleges each and every allegation contained in the First Count of the Complaint as though repeated verbatim herein.

2. At all times hereinafter mentioned defendant, Wachovia Bank, N.A., was in custody and control of the property and premises located at 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey.

3. Defendant, Wachovia Bank, N.A., was reckless, careless and/or negligent in creating, maintaining and/or failing to warn of the dangerous and/or hazardous condition of the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, was reckless, careless and/or negligent in failing to cordon off the dangerous and/or hazardous condition of the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, and was reckless, careless and/or negligent in failing and/or refusing to inspect and/or repair the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey.

4. As a direct and/or approximate result of the reckless, careless and/or negligent acts and/or omissions of defendant, Wachovia Bank, N.A., Plaintiff, Sandra Pasquariello, suffered severe, permanent and debilitating injuries; suffered, still suffers and will in the future suffer great pain and anguish; was confined for a period of time and will in the future be so confined; was, still is and will in the future be obligated to undergo medical and other needed care and therapy for her injuries; was, still is and will in the future be required to incur large expenses for the treatment of her said injuries; was, still is and will in the future be incapacitated from continuing her usual course of

18/2010 14:49 7229369904

GOLD_ALBANESE

#5190 P.O. 12/022

activities and/or employment; has suffered, still suffers and will in the future suffer loss of wages; and, was, still is and will in the future be otherwise permanently and severely damaged in her bodily movements, functions and/or activities.

WHEREFORE, Plaintiff, Sandra Pasquariello, demands judgment against the defendant, Wachovia Bank, N.A., jointly, severally, or in the alternative, individually for damages, together with interest and costs of suit.

THIRD COUNT

1. Plaintiff, Sandra Pasquariello, repeats and realleges each and every allegation contained in the First and Second Counts of the Complaint as though repeated verbatim herein.
2. At all times hereinafter mentioned, defendant 10 Dehart Street, LLC, are the owners of the property located at 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey.
3. Defendants, 10 Dehart Street, LLC, were reckless, careless and/or negligent in creating, maintaining and/or failing to warn of the dangerous and/or hazardous condition of the sidewalk located at 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, were reckless, careless and/or negligent in failing to cordon off the dangerous and/or hazardous condition of the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, and were reckless, careless and/or negligent in failing and/or refusing to inspect and/or repair the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey.
4. As a direct and/or approximate result of the reckless, careless and/or negligent acts and/or omissions of defendants, 10 Dehart Street, LLC, Plaintiff, Sandra Pasquariello, suffered severe, permanent and debilitating injuries; suffered, still suffers and will in the future suffer great pain and anguish; was confined for a period of time and will in the future be so confined; was, still is and will in the future be obligated to undergo medical and other needed care and therapy for her

injuries; was, still is and will in the future be required to incur large expenses for the treatment of her said injuries; was, still is and will in the future be incapacitated from continuing her usual course of conduct, activities and/or employment; has suffered, still suffers and will in the future suffer loss of wages; and, was, still is and will in the future be otherwise permanently and severely damaged in her bodily movements, functions and/or activities.

WHEREFORE, Plaintiff, Sandra Pasquariello, demands judgment against the defendants, 10 Dehart Street, LLC, jointly, severally, or in the alternative, individually for damages, together with interest and costs of suit.

FOURTH COUNT

1. Plaintiff, Sandra Pasquariello, repeats and realleges each and every allegation contained in the First, Second and Third Count of the Complaint as though repeated verbatim herein.
2. At all times hereinafter mentioned defendant, Fiore Consulting, was in custody and control of the property and premises located at 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey.
3. Defendant, Fiore Consulting, was reckless, careless and/or negligent in creating, maintaining and/or failing to warn of the dangerous and/or hazardous condition of the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, was reckless, careless and/or negligent in failing to cordon off the dangerous and/or hazardous condition of the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey, and was reckless, careless and/or negligent in failing and/or refusing to inspect and/or repair the sidewalk in front of 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey.
4. As a direct and/or approximate result of the reckless, careless and/or negligent acts and/or omissions of defendant, Fiore Consulting, Plaintiff, Sandra Pasquariello, suffered severe, permanent and debilitating injuries; suffered, still suffers and will in the future suffer great pain and

anguish; was confined for a period of time and will in the future be obligated to undergo medical and other needed; still is and will in the future be required to incur large expense was, still is and will in the future be incapacitated from continuing and/or employment; has suffered, still suffers and will in the future be otherwise permanently and severely injured in her movements, functions and/or activities.

WHEREFORE, Plaintiff, Sandra Pasquariello, demands that the defendant, John Does Corp., jointly, severally, or in the alternative, indemnify Plaintiff for all interest and costs of suit.

FIFTH COUNT

1. Plaintiff, Sandra Pasquariello, repeats and realleges all the allegations of the First, Second, Third and Fourth Counts as if the same were more fully set forth herein.

2. On or about April 7, 2008, Plaintiff, Sandra Pasquariello, was lawfully walking on the sidewalk located at 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey. The defendant, John Does Corps., negligently and/or carelessly operated, owned, maintained, repaired and/or constructed and/or maintained said area so as to cause plaintiff to trip and fall and

3. Plaintiff, Sandra Pasquariello, was lawfully walking on the sidewalk located at 10 Dehart Street in the Town of Morristown, County of Morris and State of New Jersey. The defendant, John Does Corps., negligently and/or carelessly operated, owned, maintained, repaired and/or constructed and/or maintained said area so as to cause plaintiff to trip and fall and

4. The sidewalk had uneven bricks which the defendant negligently and carelessly permitted to stand and remain on the sidewalk for a long period of time and beyond the time required for its discovery and/or removal.

5. Because of the uneven bricks, the area was dangerous for use by the

; was, still is and will
for her injuries; was,
of her said injuries;
course of activities
of wages; and, was,
her bodily

st the defendant,
es, together with

as of the First,
gth herein.

wfully on the
paired by defendant,
et in the Town of

walk located at 10
rsey. The defendant,
onstructed and/or

Corps. had
ng period of time

for use by the

plaintiff and other persons.

6. Defendant, John Does Corps. failed to maintain the walkway with due care rendering the said area dangerous and unsafe for use.

7.. Defendant, John Does Corps., failed to inform and warn plaintiff and other persons using the sidewalk of this dangerous and unsafe condition.

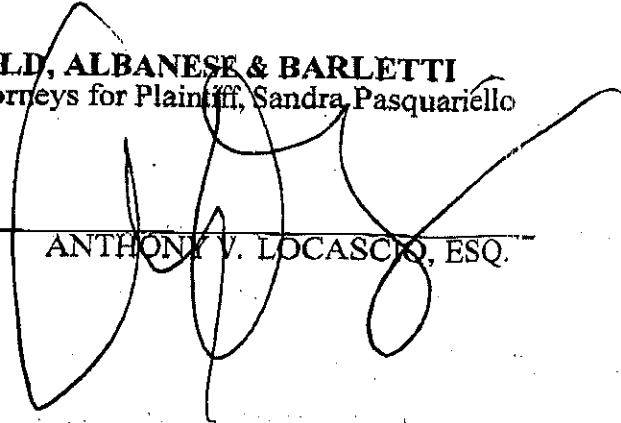
8. Defendant, John Does Corps. carelessly and negligently failed to properly inspect and maintain the sidewalk in a safe condition for use.

9. Defendant, John Does Corps., knew, or could, by the exercise of ordinary and reasonable care, have known, of the unsafe and dangerous conditions then and there existed in the said area.

10. As a direct and proximate result of the Defendant, John Does Corps.'s, negligence, carelessness, and recklessness, and improper conduct in maintaining the said premises, the Plaintiff, Sandra Pasquariello while on the said premises as aforesaid on the aforementioned date, was caused to trip and fall to the ground and suffered painful and permanent injuries in and about her body, was seriously injured, sustained great pain and suffering and mental anguish, does presently sustain the same and in the future will sustain the same, was obliged to expend large sums of money to affect a cure for the injuries, pain and suffering and mental anguish, which she sustained, and is presently obligated to expend large sums of money and in the future will be obligated to expend large sums of money so as to affect a cure for the injuries which she sustained.

WHEREFORE, plaintiff demands judgment against the above-captioned Defendant, John Does Corps., for damages, costs of suit, interest, and such other relief as the Court deems just and proper.

GOLD, ALBANESE & BARLETTI
Attorneys for Plaintiff, Sandra Pasquariello

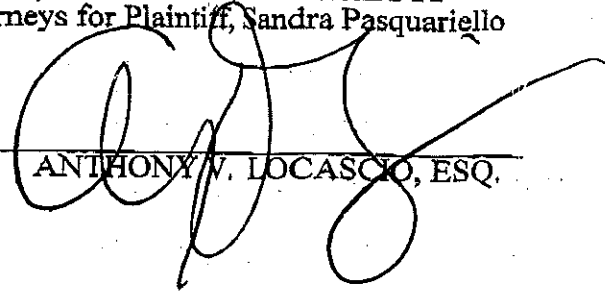
By: 
ANTHONY V. LOCASCIO, ESQ.

Dated: January 8, 2010

JURY DEMAND

Plaintiff, Sandra Pasquariello, hereby demand trial by jury of all litigable issues.

GOLD, ALBANESE & BARLETTI
Attorneys for Plaintiff, Sandra Pasquariello

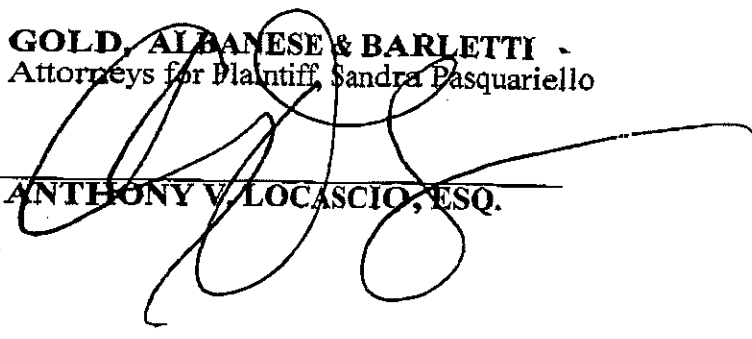
By: 
ANTHONY V. LOCASCIO, ESQ.

Dated: January 8
, 2010

DEMAND FOR RESPONSES TO INTERROGATORIES

Plaintiff, Sandra Pasquariello, hereby demands responses from defendants, Township of Morristown, Wachovia Bank, N.A., 10 Dehart Street, LLC., Fiore Consulting and John Does Corps 1 through 10, (said names being fictitious as their identities are presently unknown) to Uniform Interrogatories Forms C and C (1).

GOLD, ALBANESE & BARLETTI
Attorneys for Plaintiff, Sandra Pasquariello

BY: 
ANTHONY V. LOCASCIO, ESQ.

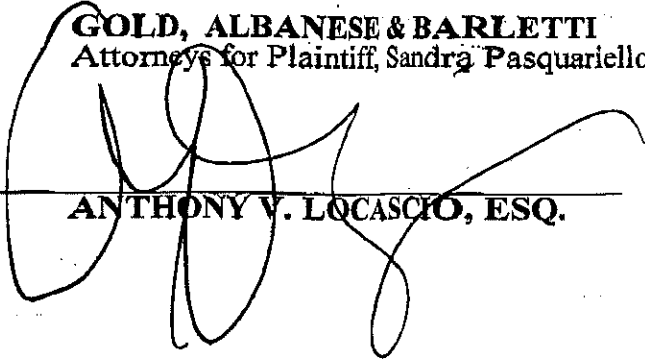
DATED: January 8, 2010

DEMAND FOR INSURANCE

Plaintiff, Sandra Pasquariello, hereby demands that the defendants, Township of Morristown, Wachovia Bank, N.A., 10 Dehart Street, LLC., Fiore Consulting and John Does Corps 1 through 10, (said names being fictitious as their identities are presently unknown), provide the appropriate proof of insurance coverage in accordance with Court Rule.

GOLD, ALBANESE & BARLETTI
Attorneys for Plaintiff, Sandra Pasquariello

BY:


ANTHONY V. LOCASCIO, ESQ.

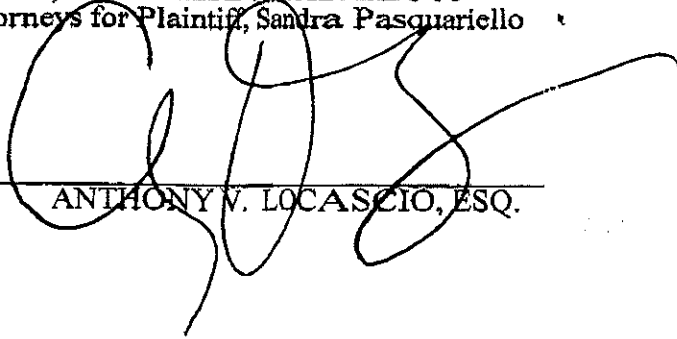
DATED: January 8, 2010

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provision of New Jersey Court Rules, Rule 4:25-4, Anthony V. Locascio, Esq., of the Law Offices of Gold, Albanese & Barletti, counsel for Plaintiff, Sandra Pasquariello, is hereby designated as trial counsel on behalf of Plaintiff, Sandra Pasquariello.

GOLD, ALBANESE & BARLETTI
Attorneys for Plaintiff, Sandra Pasquariello

By:


ANTHONY V. LOCASCIO, ESQ.

Dated: January 8, 2010

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.
Superior Court, Docket No.:

B. In my opinion, the following parties should be
joined in the within pending Cause of Action.
2. OTHER ACTIONS CONTEMPLATED YES ___ NO X

A. If Yes - Parties contemplated to be joined,
in other Causes of Action.
3. ARBITRATION PROCEEDINGS CONTEMPLATED? YES ___ NO X

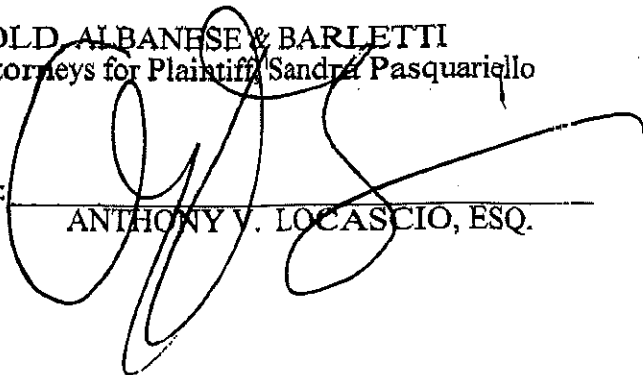
A. If Yes - Parties to Arbitration Proceedings YES ___ NO X

B. In my opinion, the following parties should be
joined in the pending Arbitration Proceedings YES ___ NO X
4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED? YES ___ NO X

A. If Yes - Parties contemplated to be joined to
Arbitration Proceedings.

In the event, that during the pendency of the within Cause of Action, I shall become aware of any change 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.

GOLD, ALBANESE & BARLETTI
Attorneys for Plaintiff Sandra Pasquariello

By: 
ANTHONY V. LOCASCIO, ESQ.

Dated: January 8, 2010

CIVIL CASE INFORMATION STATEMENT

(CIS)

Use for initial Law Division - Civil Part pleadings
(not motions) under Rule 4:5-1.
Pleading will be rejected for filing, under Rule 1:5-8(c),
if information above the black bar is not completed or if
attorney's signature is not affixed.

FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE: CK CG CA

CHG/CK NO.

AMOUNT

OVERPAYMENT

BATCH NUMBER:

ATTORNEY/PRO SE NAME
Anthony V. Locascio, Esq.

TELEPHONE NUMBER
(732)936-9901

COUNTY OF VENUE:
Morris

FIRM NAME (if Applicable)
The Law Offices of Gold, Albanese & Barletti

DOCKET NUMBER:
MRS-L-145-10

OFFICE ADDRESS
8 Maple Avenue
Bed Bank, NJ 07701

DOCUMENT TYPE: Complaint

JURY DEMAND:
☒ YES ☐ NO

NAME OF PARTY (John Doe, Plaintiff)
Sandra Pasquariello, Plaintiff

CAPTION:

Sandra Pasquariello v Township of Morristown, Wachovia Bank, N.A., LLC,
Street, LLC, Fiore Consulting, and John Does Corps.

CASE TYPE NUMBER
(see reverse side for listing)
_603

IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO
IF YOU HAVE CHECKED "YES", SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW
REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.

RELATED CASES PENDING?
☐ YES ☒ NO

IF YES, LIST DOCKET NUMBERS:

DO YOU ANTICIPATE ADDING ☐ YES
NEW PARTIES (arising out of same ☒ NO
transaction or occurrence)?

NAME OF DEFENDANTS PRIMARY INSURANCE COMPANY, IF KNOWN
☐ NONE ☐ UNKNOWN

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 IF YES, IS THAT ☐ EMPLOYER-EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) _____
RELATIONSHIP? ☐ YES ☒ NO ☐ FAMILIAL ☐ BUSINESS

DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR
PAYMENT OF FEES BY THE LOSING PARTY? YES 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 IF YES, PLEASE IDENTIFY THE
ABILITY ACCOMMODATIONS? ☐ YES ☒ NO REQUESTED ACCOMMODATIONS

WILL AN INTERPRETER BE NEEDED? ☐ YES ☒ NO IF YES, FOR WHAT LANGUAGE

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)

ATTORNEY SIGNATURE

PAGE 2

CIVIL CASE INFORMATION STATEMENT
(CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CIVIL DIVISION

2010 JAN 15 AM 11:29

RECEIVED AND FILED
SUPERIOR COURT

ASÉ TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I – 150 days discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT
- 506 OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (SUMMARY ACTION)
- 999 OTHER (briefly describe nature of action)

TRACK II – 300 days discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603 AUTO NEGLIGENCE - PERSONAL INJURY
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 699 TORT - OTHER

TRACK III – 450 days discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLE BLOWER/CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

TRACK IV – Active Case Management by Individual Judge / 450 days discovery

- 158 ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 701 ACTIONS IN LIEU OF PREROGATIVE WRIT

MASS TORT (Track IV)

- | | |
|---|-------------------------------|
| 240 REDUX/PHEN-FEN (formerly "DIET DRUG") | 271 ACCUTANE |
| 241 TOBACCO | 272 BEXTRA/CELEBREX |
| 248 CIBA GEIGY | 274 RISPERDAL/SEROQUEL/ZYPREX |
| 264 PPA | 601 ASBESTOS |
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 619 VIOXX |
| 268 MANUFACTURED GAS PLANT (MSG) | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics".

Please check off each applicable category:

- ☐ Verbal Threshold ☐ Putative Class Action ☐ Title 59

18/2010 14:50 7329369904

GOLD_ALBANESE

#5190 P.022/022

COUNTY
OR COURT
STREET
TOWN NJ 07940

TRACK ASSIGNMENT NOTICE

TELEPHONE NO. (973) 656-4100
HOURS

DATE: JANUARY 15, 2010
RE: PASQUARIELLO VVS TWP OF MORRISTOWN
DOCKET: MRS L -000145 10

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 30 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON DAVID M. IRONSON

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
(973) 656-4103.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
PETITION 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
R.4:5A-2.

ATTENTION:

ATT: ANTHONY V. LOCASCIO
GOLD ALBANESE BARLETTI & VELAZ
59 MAPLE AVENUE
RED BANK NJ 07701