

NUSBAUM, STEIN, GOLDSTEIN, BRONSTEIN & KRON

A Professional Corporation
Counsellors At Law

20 Commerce Boulevard, Suite E
Succasunna, New Jersey 07876
973-584-1400
Fax: 973-584-8747
Email: nsGBK.office@verizon.net

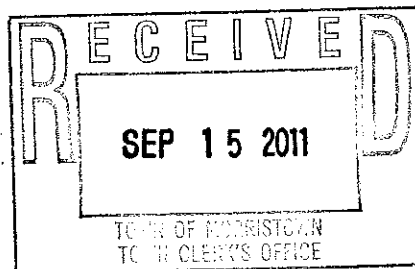
- Of Counsel -
PAUL R. NUSBAUM

LEWIS STEIN*
ALAN D. GOLDSTEIN
RONALD W. BRONSTEIN
PATRICIA E. ROCHE °
LARRY I. KRON
ROBERT D. KOBIN □
SHARON L. FREEMAN+ ^
SUSAN B. REED
STEVEN J. LOEWENTHAL ◊

CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A
*Civil Trial Attorney
°Matrimonial Attorney
^Workers' Compensation Attorney
□Member Florida Bar
◊Member New York Bar
+Member Pennsylvania Bar

September 12, 2011

Certified Mail R.R.R.
Matthew Stechauner
Town Clerk
Town of Morristown
200 South Street, CN 914
Morristown, NJ 07963-0914



RE: Alberto Sanchez v. Town of Morristown, et al.
Docket No.: MRS-L-2501-11

Dear Mr. Stechauner:

Enclosed please find a Summons and Complaint on behalf of Alberto Sanchez, filed by this office in the Superior Court, Law Division, Morris County.

I would suggest you forward this Summons & Complaint directly to your attorney so this matter can proceed in due course.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to be "RDK", written over the printed name Robert D. Kobin.

Robert D. Kobin

RDK/em
enc.

NUSBAUM, STEIN, GOLDSTEIN,
BRONSTEIN & KRON, P.A.
20 Commerce Boulevard, Suite E
Succasunna, New Jersey 07876
(973) 584-1400
Attorneys for Plaintiff

ALBERTO SANCHEZ,

Plaintiff,

vs.

TOWN OF MORRISTOWN, MORRISTOWN
POLICE DEPARTMENT, POLICE OFFICER
SGT. ROBERT HOLTZ, POLICE OFFICER
YEISON DELOSSANTOS, POLICE OFFICER
DET. STUART GREET, POLICE OFFICER
MICHAEL MOLNER, JOHN DOES 1-5 and
JOHN DOES 6-10,

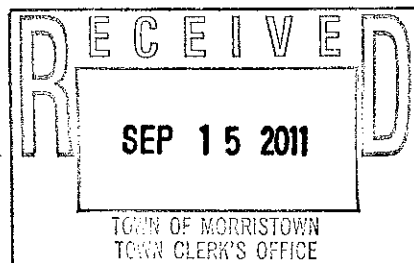
Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MORRIS COUNTY

Docket No. MRS-L-2501-11

Civil Action

SUMMONS



The State of New Jersey, to the Above Named Defendant:

TOWN OF MORRISTOWN

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DATED: September 12, 2011

/s/ Donald E. Phelan
DONALD E. PHELAN, Clerk

Name and Address of Defendant:

Matthew Stechauner, Town Clerk
Town of Morristown
200 South Street, CN 914
Morristown, NJ 07963-0914

MORRIS COUNTY
SUPERIOR COURT
COURT STREET
MORRISTOWN NJ 07960

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 656-4100
COURT HOURS

DATE: SEPTEMBER 07, 2011
RE: SANCHEZ VS TOWN OF MORRISTOWN
DOCKET: MRS L -002501 11

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 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
T: (973) 656-4103.

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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: ROBERT D. KOBIN
NUSBAUM STEIN GOLDSTEIN B & K
20 COMMERCE BLVD STE E
SUCCASUNNA NJ 07876-1348

UAMV4

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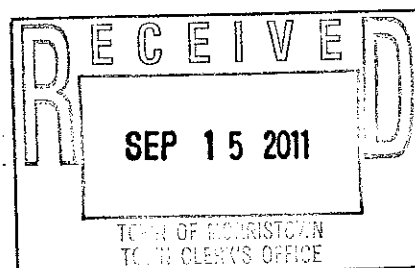
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RDK/em
enc.

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(973) 584-1400
Attorneys for Plaintiff

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Plaintiff,

vs.

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POLICE DEPARTMENT, POLICE OFFICER
SGT. ROBERT HOLTZ, POLICE OFFICER
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DET. STUART GREET, POLICE OFFICER
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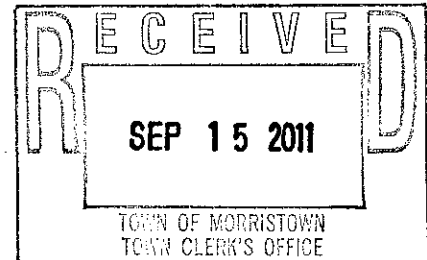
Defendants.

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DATED: September 12, 2011

/s/ Donald E. Phelan

DONALD E. PHELAN, Clerk

Name and Address of Defendant:

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200 South Street, CN 914
Morristown, NJ 07963-0914

MORRIS COUNTY
SUPERIOR COURT
COURT STREET
MORRISTOWN NJ 07960

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 656-4100
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PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
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NUSBAUM STEIN GOLDSTEIN B & K
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UAMV4

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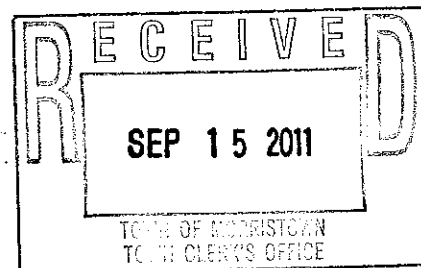
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Docket No.: MRS-L-2501-11

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Robert D. Kobin

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Attorneys for Plaintiff

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Plaintiff,

vs.

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SGT. ROBERT HOLTZ, POLICE OFFICER
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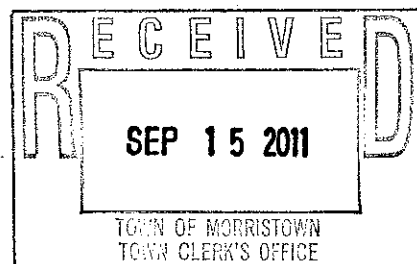
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SUPERIOR COURT OF NEW JERSEY
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DATED: September 12, 2011

/s/ Donald E. Phelan

DONALD E. PHELAN, Clerk

Name and Address of Defendant:

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Town of Morristown
200 South Street, CN 914
Morristown, NJ 07963-0914

MORRIS COUNTY
SUPERIOR COURT
COURT STREET
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UAMV4

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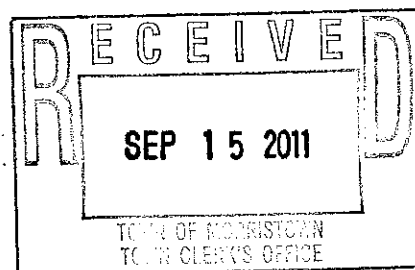
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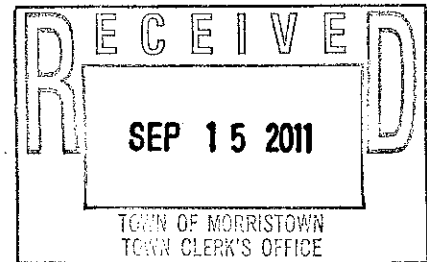
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UAMV4

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
	Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		PAYMENT TYPE: ☐ CK ☐ CG ☐ CA	
			CHG/CK NO.	
			AMOUNT:	
			OVERPAYMENT:	
		BATCH NUMBER:		
ATTORNEY / PRO SE NAME Robert D. Kobin		TELEPHONE NUMBER (973) 584-1400		COUNTY OF VENUE Morris
FIRM NAME (if applicable) Nusbaum, Stein, Goldstein, Bronstein & Kron, PA			DOCKET NUMBER (when available) L-2501-11	
OFFICE ADDRESS 20 Commerce Boulevard, Suite E Succasunna, NJ 07876			DOCUMENT TYPE Complaint	
			JURY DEMAND ☒ YES ☐ NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Alberto Sanchez		CAPTION Alberto Sanchez v. Town of Morristown, Morristown Police Department, PO Sgt. Robert Holtz, PO Yelson DeLos Santos, PO Det. Stuart Greer, PO Michael Molner, John Does 1-5 and John Does 6-10		
CASE TYPE NUMBER (See reverse side for listing) 005		IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A-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 ANY PARTIES (arising out of same transaction or occurrence)? ☐ YES ☒ NO		NAME OF DEFENDANT'S 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, PAST OR RECURRENT RELATIONSHIP? ☐ YES ☒ NO		IF YES, IS THAT RELATIONSHIP: ☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) ☐ 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 DISABILITY ACCOMMODATIONS? ☐ YES ☒ NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? ☒ YES ☐ NO		IF YES, FOR WHAT LANGUAGE? Spanish		
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 <i>Rule 1:38-7(b)</i> .				
ATTORNEY SIGNATURE: 				



CIVIL CASE INFORMATION STATEMENT (CIS)

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

CASE 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 (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 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
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 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 WHISTLEBLOWER / 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

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Centrally Managed Litigation (Track IV)

- | | |
|----------------------------------|--|
| 280 ZELNORM | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 285 STRYKER TRIDENT HIP IMPLANTS | 291 PELVIC MESH/GYNECARE |
| 288 PRUDENTIAL TORT LITIGATION | 292 PELVIC MESH/BARD |
| 289 REGLAN | 293 DEPUY ASR HIP IMPLANT LITIGATION |

Mass Tort (Track IV)

- | | |
|---------------------------------------|--|
| 248 CIBA GEIGY | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 282 FOSAMAX |
| 271 ACCUTANE/ISOTRETINOIN | 284 NUVARING |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 286 LEVAQUIN |
| 278 ZOMETA/AREZIA | 287 YAZ/YASMIN/OCELLA |
| 279 GADOLINIUM | 601 ASBESTOS |

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

☐ Putative Class Action

☒ Title 59

CIVIL DIVISION

ALBERTO SANCHEZ,
Plaintiff,

V.

TOWN OF MORRISTOWN, MORRISTOWN
POLICE DEPARTMENT;
POLICE OFFICER SGT. ROBERT HOLTZ,
POLICE OFFICER YEISON DELOSSANTOS,
POLICE OFFICER DET. STUART GREET,
POLICE OFFICER MICHAEL MOLNER,
JOHN DOES 1-5 and JOHN DOES 6-10,
Defendants.

1) SUPERIOR COURT OF NEW JERSEY
2) CIVIL DIVISION: MORRIS COUNTY

DOCKET NO. - MRS L
CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, Alberto Sanchez residing in 1306 West Lehigh Street, Apt. 2, Bethlehem, PA 18018 formerly of 20 Early Street, 3rd Floor, Morristown, Morris County, New Jersey by way of Complaint against the Defendants herein say:

THE PARTIES

1. Defendant Town of Morristown is a public entity incorporated pursuant to the laws of the State of New Jersey. Defendant Town of Morristown maintains a Police Department which is tasked with enforcing the Criminal Laws of the State of New Jersey, and for promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers and is responsible the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez.

2. Defendant Det. Stuart Greer Police Officer was at all times relevant hereto employed by the Morristown Police Department and was working as the assigned night shift Detective on September 5, 2009 and was responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez.

3. Defendants Sgt. Robert Holtz, Police Officer Michael Molner and Police Officer Yeison DeLos Santos were at all times relevant hereto, employed by the Morristown Police Department and were dispatched to 20 Early Street in the Town of Morristown, Morris County, New Jersey on September 5, 2009 upon the report of a burglary or home invasion. These Defendants were responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez.

4. Defendants John Does 1-5 were at all times relevant hereto, supervisory personnel of the Morristown Police Department and were responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez and/or for promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers. The identities of these individuals are currently unknown. Should continuing discovery reveal their true identities, this Complaint shall be amended to include the same.

5. John Does 6-10 were at all times relevant hereto, agencies that were responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez. The identities of these individuals are currently unknown. Should continuing discovery reveal their true identities, this Complaint shall be amended to include the same.

6. Hereinafter Defendants Town of Morristown, Morristown Police Department and John Does 6-10 shall be referred to collectively as "Defendants Morristown".

7. Hereinafter Defendants Det. Stuart Greer, Sgt. Robert Holtz, PO Yeison DeLos Santos, and PO Michael Molner and John Does 1-5 shall collectively be referred to collectively as "Individual Defendants".

COUNT ONE
FALSE ARREST/FALSE IMPRISONMENT

1. Plaintiff Alberto Sanchez repeats and realleges any and all allegations in The Parties section of this Complaint as though set forth verbatim herein.

2. On or about September 5, 2009 the Plaintiff Alberto Sanchez was at his home located at 20 Early Street, Morristown, Morris County, New Jersey. The Plaintiff resided at that location on the third floor with two additional male roommates.

3. At approximately 1:30 – 2:00 a.m. on the morning of September 5, 2009, a woman identified as Jeaneth Consuelo Bonilla who resided at 20 Early Street, 2nd Floor, Morristown, Morris County, New Jersey phoned the Morristown Police Department to report that her pocketbook had been stolen by someone who had reached into her window.

4. At the same time and place, the Complainant Jeaneth Consuelo Bonilla identified the individual who had attempted to take her pocketbook as a "Hispanic male with a light colored face, black hair and a black colored t-shirt who was crouching on the fire escape". The Complainant further stated the she believed that the person attempting to take her pocketbook was "possibly" a resident of the third floor. As a result of the description given by the Complainant Defendant Law Enforcement Personnel arrested Renan-Yovany Castro-Lainez.

5. At the same time and place, Defendant Law Enforcement Personnel arrested Plaintiff Alberto Sanchez without probable cause and further without any evidence that the Plaintiff Alberto Sanchez had been involved in the offense of burglary and/or theft. Further,

there was no probable cause for the arrest and incarceration of the Plaintiff Alberto Sanchez on the charge of conspiracy.

6. As a result of his arrest, the Plaintiff Alberto Sanchez was incarcerated in the Morris County Jail for approximately four (4) days and on November 10, 2009 any and all charges filed against the Plaintiff Alberto Sanchez were administratively dismissed.

7. As a result of the actions of the Defendants County of Morris; Morristown Police Department; Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10; Plaintiff Alberto Sanchez was wrongfully detained and/or deprived of his freedom and liberty and suffered damages to his reputation.

WHEREFORE, Plaintiff Alberto Sanchez demands judgment against the Defendants Town of Morristown; Morristown Police Department; Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT TWO
False Arrest/False Imprisonment
pursuant to N.J.S.A. § 10:6-2

1. Plaintiff Alberto Sanchez hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. The Defendants Morristown and Individual Defendant Law Enforcement Personnel violated Plaintiff's rights secured by N.J.S.A. § 10:6-2 by acting under color of law and causing Plaintiff to be wrongfully arrested and imprisoned against his will without proper legal authority, legal justification, and/or probable cause in violation of Plaintiff's rights,

privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.

3. Such violation of Plaintiff's rights, privileges, and immunities by Defendant Morristown and Individual Defendants Law Enforcement Personnel resulted in severe and permanent injuries to Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to his reputation.

WHEREFORE, Plaintiff demands judgment against the Defendants Town of Morristown, Morristown Police Department, Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT THREE
False Arrest/False Imprisonment
pursuant to 42 U.S.C. § 1983

1. Plaintiff Alberto Sanchez hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. The Individual Defendants Law Enforcement Personnel violated Plaintiff's rights secured by 42 U.S.C. § 1983 by acting under color of law and causing Plaintiff Alberto Sanchez to be wrongfully arrested and imprisoned against his will without proper legal authority, legal justification, and/or probable cause in violation of Plaintiff's rights, privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.

3. Such violation of Plaintiff's rights, privileges, and immunities by the Individual Defendant Law Enforcement Personnel resulted in severe and permanent injuries to Plaintiff, including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to his reputation.

WHEREFORE, Plaintiff Alberto Sanchez demands judgment against the Defendants Town of Morristown, Morristown Police Department, Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT FOUR
Negligent and Careless Training and Supervision
and Promulgating Policies, Customs and Practices

1. Plaintiff Alberto Sanchez hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. Defendants Morristown owed a duty to Plaintiff and the general public to exercise reasonable care and skill in training and supervising assistant prosecutors and/or law enforcement officers and in promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers.

3. Defendants Morristown breached that duty by training and supervising police officers negligently and carelessly and by negligently and carelessly promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of assistant prosecutors and/or law enforcement officers.

4. Such negligence and carelessness by Defendants Morristown resulted in severe and permanent injuries to Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to their reputations.

WHEREFORE, Plaintiff demands judgment against Defendants Town of Morristown; Morristown Police Department; and John Does 6-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT FIVE
Inadequate Training and Supervision and
Promulgating Policies, Customs and Practices
in Violation of N.J.S.A. § 10:6-2

1. Plaintiff hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. Defendants Morristown violated Plaintiff's rights secured by N.J.S.A. § 10:6-2 by training, supervising law enforcement officers and by promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers, recklessly, deliberately indifferent, and/or with actual or implied knowledge that such training and supervision and/or promulgation of official policies, customs, and practices would lead to wrongful and unconstitutional law enforcement activity in violation of Plaintiff's rights, privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.

3. Such reckless, deliberately indifferent, and/or intentionally wrongful

training and supervision and/or promulgation of policies, customs and practices by Defendants Morristown resulted in severe and permanent injuries to the Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to their reputations.

WHEREFORE, Plaintiff demands judgment against Defendants Town of Morristown, Morristown Police Department and John Does 6-10 jointly and severally for compensatory damages, punitive damages, interest, counsel fees, costs of suit, and any other relief the Court deems appropriate.

COUNT SIX
Inadequate Training and Supervision and
Promulgating Policies, Customs and Practices
in Violation of 42 U.S.C. § 1983

1. Plaintiff hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.
2. Defendants violated Plaintiff's rights secured by 42 U.S.C. § 1983 by training and supervising law enforcement officers and by promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers recklessly, with deliberate indifference, and/or with actual knowledge that such training and supervision and/or promulgation of official policies, customs, and practices would lead to wrongful and unconstitutional law enforcement activity in violation of Plaintiff's rights, privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.
3. Such reckless, deliberately indifferent, and/or intentional wrongful training and supervision and/or promulgation of policies, customs and practices by Defendant Morristown

resulted in severe and permanent injuries to the Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to his reputation.

WHEREFORE, Plaintiff demands judgment against Defendants Town of Morristown, Morristown Police Department and John Does 6-10 jointly and severally for compensatory damages, punitive damages, interest, counsel fees, costs of suit, and any other relief the Court deems appropriate.

JURY DEMAND

Plaintiff hereby requests a trial by jury.

DESIGNATION OF TRIAL COUNSEL

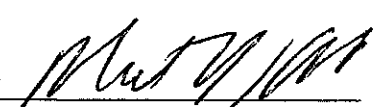
Pursuant to R 4:25-4, notice is hereby given that Robert D. Kobin is designated as trial counsel in the above captioned matter.

CERTIFICATION

1. The within matter in controversy is not the subject of any other action pending in any other court or any pending arbitration proceeding.
2. No other action or arbitration proceeding is contemplated by the Plaintiff.
3. No other party should presently be joined in this action.

NUSBAUM, STEIN, GOLDSTEIN
BRONSTEIN & KRON, P.A.

By


Robert D. Kobin

Date: September 6, 2011

RECEIVED & FILED
SUPERIOR COURT
2011 SEP - 6 P 4:00
CIVIL DIVISION

9/15/11

NUSBAUM, STEIN, GOLDSTEIN,
BRONSTEIN & KRON, P.A.
20 Commerce Boulevard, Suite E
Succasunna, New Jersey 07876
(973) 584-1400
Attorneys for Plaintiff

ALBERTO SANCHEZ,

Plaintiff,

vs.

TOWN OF MORRISTOWN, MORRISTOWN
POLICE DEPARTMENT, POLICE OFFICER
SGT. ROBERT HOLTZ, POLICE OFFICER
YEISON DELOSSANTOS, POLICE OFFICER
DET. STUART GREET, POLICE OFFICER
MICHAEL MOLNER, JOHN DOES 1-5 and
JOHN DOES 6-10,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MORRIS COUNTY

Docket No. MRS-L-2501-11

Civil Action

SUMMONS

The State of New Jersey, to the Above Named Defendant:

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. (The address of each deputy clerk of the Superior Court is provided.) a \$135.00 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.

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. 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. The phone numbers for the county in which this action is pending are: Legal Services Office (973) 285-6911, and Lawyer Referral Services Office (973) 267-5882.

DATED: September 12, 2011

/s/ Donald E. Phelan

DONALD E. PHELAN, Clerk

Name and Address of Defendant:

Matthew Stechauner, Town Clerk
Town of Morristown
200 South Street, CN 914
Morristown, NJ 07963-0914

MORRIS COUNTY
SUPERIOR COURT
COURT STREET
MORRISTOWN NJ 07960

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 656-4100
COURT HOURS

DATE: SEPTEMBER 07, 2011
RE: SANCHEZ VS TOWN OF MORRISTOWN
DOCKET: MRS L -002501 11

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS: 450 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) 656-4103.

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: ROBERT D. KOBIN
MUSBAUM STEIN GOLDSTEIN B & K
20 COMMERCE BLVD STE E
SUCCASUNNA NJ 07876-1348

JUAMV4

Appendix XII-B1

	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 1:5-6(c), if information above the black bar is not completed or 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 Robert D. Kobin		TELEPHONE NUMBER (973) 584-1400	
	COUNTY OF VENUE Morris		DOCKET NUMBER (when available) L-2501-11	
	FIRM NAME (if applicable) Nusbaum, Stein, Goldstein, Bronstein & Kron, PA		DOCUMENT TYPE Complaint	
OFFICE ADDRESS 20 Commerce Boulevard, Suite E Succasunna, NJ 07876		JURY DEMAND ☒ YES ☐ NO		
NAME OF PARTY (e.g., John Doe, Plaintiff) Alberto Sanchez		CAPTION Alberto Sanchez v. Town of Morristown, Morristown Police Department, PO Sgt. Robert Holtz, PO Yeison DeLos Santos, PO Det. Stuart Greer, PO Michael Molner, John Does 1-5 and John Does 6-10		
CASE TYPE NUMBER (See reverse side for listing) 005		IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -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 ANY PARTIES (arising out of same transaction or occurrence)? ☐ YES ☒ NO		NAME OF DEFENDANT'S 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, PAST OR RECURRENT RELATIONSHIP? ☐ YES ☒ NO		IF YES, IS THAT RELATIONSHIP: ☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) ☐ 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 RECEIVED & FILED SEP - 6 - P 4: 01 CIVIL DIVISION SUPERIOR COURT				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? ☐ YES ☒ NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? ☒ YES ☐ NO		IF YES, FOR WHAT LANGUAGE? Spanish		
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).				
ATTORNEY SIGNATURE: 				



CIVIL CASE INFORMATION STATEMENT (CIS)

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

CASE 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 (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 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
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 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 WHISTLEBLOWER / 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

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Centrally Managed Litigation (Track IV)

- 280 ZELNORM
- 285 STRYKER TRIDENT HIP IMPLANTS
- 288 PRUDENTIAL TORT LITIGATION
- 289 REGLAN

- 290 POMPTON LAKES ENVIRONMENTAL LITIGATION
- 291 PELVIC MESH/GYNECARE
- 292 PELVIC MESH/BARD
- 293 DEPUY ASR HIP IMPLANT LITIGATION

Mass Tort (Track IV)

- 248 CIBA GEIGY
- 266 HORMONE REPLACEMENT THERAPY (HRT)
- 271 ACCUTANE/ISOTRETINOIN
- 274 RISPERDAL/SEROQUEL/ZYPREXA
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- 282 FOSAMAX
- 284 NUVARING
- 286 LEVAQUIN
- 287 YAZ/YASMIN/OCELLA
- 601 ASBESTOS

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

☐ Putative Class Action

☒ Title 59

CIVIL DIVISION

ALBERTO SANCHEZ,
Plaintiff,

Y.

TOWN OF MORRISTOWN, MORRISTOWN
POLICE DEPARTMENT;
POLICE OFFICER SGT. ROBERT HOLTZ,
POLICE OFFICER YEISON DELOSSANTOS,
POLICE OFFICER DET. STUART GREET,
POLICE OFFICER MICHAEL MOLNER,
JOHN DOES 1-5 and JOHN DOES 6-10,
Defendants.

1) SUPERIOR COURT OF NEW JERSEY
2) CIVIL DIVISION: MORRIS COUNTY

DOCKET NO. - MRS L
CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, Alberto Sanchez residing in 1306 West Lehigh Street, Apt. 2, Bethlehem, PA 18018 formerly of 20 Early Street, 3rd Floor, Morristown, Morris County, New Jersey by way of Complaint against the Defendants herein say:

THE PARTIES

1. Defendant Town of Morristown is a public entity incorporated pursuant to the laws of the State of New Jersey. Defendant Town of Morristown maintains a Police Department which is tasked with enforcing the Criminal Laws of the State of New Jersey, and for promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers and is responsible the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez.

2. Defendant Det. Stuart Greer Police Officer was at all times relevant hereto employed by the Morristown Police Department and was working as the assigned night shift Detective on September 5, 2009 and was responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez.

3. Defendants Sgt. Robert Holtz, Police Officer Michael Molner and Police Officer Yeison DeLos Santos were at all times relevant hereto, employed by the Morristown Police Department and were dispatched to 20 Early Street in the Town of Morristown, Morris County, New Jersey on September 5, 2009 upon the report of a burglary or home invasion. These Defendants were responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez.

4. Defendants John Does 1-5 were at all times relevant hereto, supervisory personnel of the Morristown Police Department and were responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez and/or for promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers. The identities of these individuals are currently unknown. Should continuing discovery reveal their true identities, this Complaint shall be amended to include the same.

5. John Does 6-10 were at all times relevant hereto, agencies that were responsible for the wrongful arrest and incarceration of the Plaintiff Alberto Sanchez. The identities of these individuals are currently unknown. Should continuing discovery reveal their true identities, this Complaint shall be amended to include the same.

6. Hereinafter Defendants Town of Morristown, Morristown Police Department and John Does 6-10 shall be referred to collectively as "Defendants Morristown".

7. Hereinafter Defendants Det. Stuart Greer, Sgt. Robert Holtz, PO Yeison DeLos Santos, and PO Michael Molner and John Does 1-5 shall collectively be referred to collectively as "Individual Defendants".

COUNT ONE
FALSE ARREST/FALSE IMPRISONMENT

1. Plaintiff Alberto Sanchez repeats and realleges any and all allegations in The Parties section of this Complaint as though set forth verbatim herein.

2. On or about September 5, 2009 the Plaintiff Alberto Sanchez was at his home located at 20 Early Street, Morristown, Morris County, New Jersey. The Plaintiff resided at that location on the third floor with two additional male roommates.

3. At approximately 1:30 – 2:00 a.m. on the morning of September 5, 2009, a woman identified as Jeaneth Consuelo Bonilla who resided at 20 Early Street, 2nd Floor, Morristown, Morris County, New Jersey phoned the Morristown Police Department to report that her pocketbook had been stolen by someone who had reached into her window.

4. At the same time and place, the Complainant Jeaneth Consuelo Bonilla identified the individual who had attempted to take her pocketbook as a "Hispanic male with a light colored face, black hair and a black colored t-shirt who was crouching on the fire escape". The Complainant further stated the she believed that the person attempting to take her pocketbook was "possibly" a resident of the third floor. As a result of the description given by the Complainant Defendant Law Enforcement Personnel arrested Renan-Yovany Castro-Lainez.

5. At the same time and place, Defendant Law Enforcement Personnel arrested Plaintiff Alberto Sanchez without probable cause and further without any evidence that the Plaintiff Alberto Sanchez had been involved in the offense of burglary and/or theft. Further,

there was no probable cause for the arrest and incarceration of the Plaintiff Alberto Sanchez on the charge of conspiracy.

6. As a result of his arrest, the Plaintiff Alberto Sanchez was incarcerated in the Morris County Jail for approximately four (4) days and on November 10, 2009 any and all charges filed against the Plaintiff Alberto Sanchez were administratively dismissed.

7. As a result of the actions of the Defendants County of Morris; Morristown Police Department; Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10; Plaintiff Alberto Sanchez was wrongfully detained and/or deprived of his freedom and liberty and suffered damages to his reputation.

WHEREFORE, Plaintiff Alberto Sanchez demands judgment against the Defendants Town of Morristown; Morristown Police Department; Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT TWO
False Arrest/False Imprisonment
pursuant to N.J.S.A. § 10:6-2

1. Plaintiff Alberto Sanchez hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. The Defendants Morristown and Individual Defendant Law Enforcement Personnel violated Plaintiff's rights secured by N.J.S.A. § 10:6-2 by acting under color of law and causing Plaintiff to be wrongfully arrested and imprisoned against his will without proper legal authority, legal justification, and/or probable cause in violation of Plaintiff's rights,

privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.

3. Such violation of Plaintiff's rights, privileges, and immunities by Defendant Morristown and Individual Defendants Law Enforcement Personnel resulted in severe and permanent injuries to Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to his reputation.

WHEREFORE, Plaintiff demands judgment against the Defendants Town of Morristown, Morristown Police Department, Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT THREE
False Arrest/False Imprisonment
pursuant to 42 U.S.C. § 1983

1. Plaintiff Alberto Sanchez hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. The Individual Defendants Law Enforcement Personnel violated Plaintiff's rights secured by 42 U.S.C. § 1983 by acting under color of law and causing Plaintiff Alberto Sanchez to be wrongfully arrested and imprisoned against his will without proper legal authority, legal justification, and/or probable cause in violation of Plaintiff's rights, privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.

3. Such violation of Plaintiff's rights, privileges, and immunities by the Individual Defendant Law Enforcement Personnel resulted in severe and permanent injuries to Plaintiff, including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to his reputation.

WHEREFORE, Plaintiff Alberto Sanchez demands judgment against the Defendants Town of Morristown, Morristown Police Department, Police Officer Sgt. Robert Holtz, Police Officer Yeison DeLosSantos, Police Officer Det. Stuart Greer, Police Officer Michael Molner, and John Does 1-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT FOUR
Negligent and Careless Training and Supervision
and Promulgating Policies, Customs and Practices

1. Plaintiff Alberto Sanchez hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. Defendants Morristown owed a duty to Plaintiff and the general public to exercise reasonable care and skill in training and supervising assistant prosecutors and/or law enforcement officers and in promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers.

3. Defendants Morristown breached that duty by training and supervising police officers negligently and carelessly and by negligently and carelessly promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of assistant prosecutors and/or law enforcement officers.

4. Such negligence and carelessness by Defendants Morristown resulted in severe and permanent injuries to Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to their reputations.

WHEREFORE, Plaintiff demands judgment against Defendants Town of Morristown; Morristown Police Department; and John Does 6-10, jointly and severally for compensatory damages, interest, counsel fees, costs of suit and any other relief that the Court deems appropriate.

COUNT FIVE
Inadequate Training and Supervision and
Promulgating Policies, Customs and Practices
in Violation of N.J.S.A. § 10:6-2

1. Plaintiff hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.

2. Defendants Morristown violated Plaintiff's rights secured by N.J.S.A. § 10:6-2 by training, supervising law enforcement officers and by promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers, recklessly, deliberately indifferent, and/or with actual or implied knowledge that such training and supervision and/or promulgation of official policies, customs, and practices would lead to wrongful and unconstitutional law enforcement activity in violation of Plaintiff's rights, privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.

3. Such reckless, deliberately indifferent, and/or intentionally wrongful

training and supervision and/or promulgation of policies, customs and practices by Defendants Morristown resulted in severe and permanent injuries to the Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to their reputations.

WHEREFORE, Plaintiff demands judgment against Defendants Town of Morristown, Morristown Police Department and John Does 6-10 jointly and severally for compensatory damages, punitive damages, interest, counsel fees, costs of suit, and any other relief the Court deems appropriate.

COUNT SIX
Inadequate Training and Supervision and
Promulgating Policies, Customs and Practices
in Violation of 42 U.S.C. § 1983

1. Plaintiff hereby repeats and realleges any and all of the allegations in this Complaint as though set forth verbatim herein.
2. Defendants violated Plaintiff's rights secured by 42 U.S.C. § 1983 by training and supervising law enforcement officers and by promulgating official policies, customs, and practices concerning the activities, hiring, training, and supervising of law enforcement officers recklessly, with deliberate indifference, and/or with actual knowledge that such training and supervision and/or promulgation of official policies, customs, and practices would lead to wrongful and unconstitutional law enforcement activity in violation of Plaintiff's rights, privileges, and immunities secured by the Constitution and Laws of the United States and State of New Jersey including but not limited to the Fourth and Fourteenth Amendments of the United States Constitution.
3. Such reckless, deliberately indifferent, and/or intentional wrongful training and supervision and/or promulgation of policies, customs and practices by Defendant Morristown

resulted in severe and permanent injuries to the Plaintiff including but not limited to emotional distress, deprivation of his freedom and liberty, and damages to his reputation.

WHEREFORE, Plaintiff demands judgment against Defendants Town of Morristown, Morristown Police Department and John Does 6-10 jointly and severally for compensatory damages, punitive damages, interest, counsel fees, costs of suit, and any other relief the Court deems appropriate.

JURY DEMAND

Plaintiff hereby requests a trial by jury.

DESIGNATION OF TRIAL COUNSEL

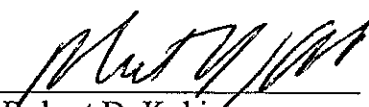
Pursuant to R 4:25-4, notice is hereby given that Robert D. Kobin is designated as trial counsel in the above captioned matter.

CERTIFICATION

1. The within matter in controversy is not the subject of any other action pending in any other court or any pending arbitration proceeding.
2. No other action or arbitration proceeding is contemplated by the Plaintiff.
3. No other party should presently be joined in this action.

NUSBAUM, STEIN, GOLDSTEIN
BRONSTEIN & KRON, P.A.

By


Robert D. Kobin

Date: September 6, 2011

RECEIVED & FILED
SUPERIOR COURT
2011 SEP - 6 P 11:08
CIVIL DIVISION