

LEONARD & LEONARD, P.A.
A Professional Association
J. Sean Connelly, Esq.
165 Washington Street
Morristown, New Jersey 07960
Telephone No. (973) 984-1414
Attorneys for Plaintiff(s)

JESSICA A. GREANEY AND JOSEPH
GREANEY, her husband

Plaintiff(s),

-vs-

140 WASHINGTON STREET, LLC, TOWN OF
MORRISTOWN VERIZON NEW JERSEY INC.,
CABLEVISION SYSTEMS, JCP&L, A/K/A
FIRST ENERGY, ABC COMPANY 1-10,
(said names being fictitious and
unknown), JOHN DOE'S 1-10, (said
names being fictitious and unknown)
JOE DOE'S 1-10, (said names being
fictitious and unknown) DEF COMPANY
1-10, (said name being fictitious
and unknown) and GHI COMPANY 1-10,
(said names being fictitious and
unknown).

Defendant(s).

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MORRIS COUNTY
DOCKET NO. : MRS-L-1581-14

CIVIL ACTION

SUMMONS

RECEIVED

JUL 21 2014

TOWN OF MORRISTOWN
TOWN CLERK'S OFFICE

THE STATE OF NEW JERSEY, to the above named Defendant(s): **TOWN OF MORRISTOWN**

The plaintiffs, 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, New Jersey 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 cost 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. * \$135 FOR CHANCERY DIVISION CASES OR LAW DIVISION CASES.

DATED: July 2, 2014

Jennifer Perez/s/

JENNIFER PEREZ

Clerk of the Superior Court

Name of Defendant to be served:

Town of Morristown

200 South Street

Morristown, NJ 07960

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: JUNE 25, 2014
RE: GREANEY VS 140 WASHINGTON STREET LLC
DOCKET: MRS L --001591 14

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 DONALD S. COBURN

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: J S. CONNELLY
LEONARD & LEONARD
165 WASHINGTON ST
MORRISTOWN NJ 07960-3759

JUXPHIC

Appendix XII-B1

EX-100 BY Ref'd to Att'y

	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 CASE TYPE: ☐ OK ☒ CG ☐ CA AMOUNT: 58835 OVERPAYMENT: 20.00 BATCH NUMBER: 009	
	ATTORNEY / PRO SE NAME J. SEAN CONNELLY, ESQ.		TELEPHONE NUMBER (973) 984-1414	
FIRM NAME (if applicable) LEONARD & LEONARD, P.A.		COUNTY OF VENUE Morris		
OFFICE ADDRESS 165 WASHINGTON STREET MORRISTOWN, NEW JERSEY 07960		DOCKET NUMBER (when available) MRS-L- 1581 -14		
		DOCUMENT TYPE COMPLAINT		
		JURY DEMAND ☒ YES ☐ NO		
NAME OF PARTY (e.g., John Doe, Plaintiff) JESSICA GREANEY, PLAINTIFF JOSEPH GREANEY, PLAINTIFF		CAPTION GREANEY VS. 140 WASHINGTON, LLC, TOWN OF MORRISTOWN, VERIZON, & JCP&L, ET AL.		
CASE TYPE NUMBER (See reverse side for listing) 605	HURRICANE SANDY RELATED? ☒ YES ☐ NO	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) SEDWICK CMS ☐ 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				
2014 JUN 24 11:39 RECEIVED & FILED SUPERIOR COURT MORRIS COUNTY CIVIL DIVISION				
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?		
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
- 810 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 821 UM or UIM CLAIM (includes bodily injury)
- 899 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

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 288 PRUDENTIAL TORT LITIGATION |
| 271 ACCUTANE/ISOTRETINOIN | 289 REGIAN |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 278 ZOMETAX/AREXIA | 291 PELVIC MESH/GYNECARE |
| 279 GADOLINIUM | 292 PELVIC MESH/BARD |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 282 FOSAMAX | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 284 NUVARING | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 601 ASBESTOS |
| 287 YAZ/YASMIN/OCELLA | 623 PROPECIA |

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

LEONARD & LEONARD, P.A.
J. SEAN CONNELLY, ESQ. ID #044211994
A Professional Association
165 Washington Street
Morristown, New Jersey 07960
Tel. No. (973) 984-1414
Attorneys for Plaintiff(s)

ENTERED ON DOCS
RECEIVED & FILED
SUPERIOR COURT

2014 JUN 24 A 11:39

MORRIS COUNTY
CIVIL DIVISION

JESSICA A. GREANEY AND JOSEPH GREANEY, her husband Plaintiff(s), -vs- 140 WASHINGTON STREET, LLC, TOWN OF MORRISTOWN VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L, A/K/A FIRST ENERGY, ABC COMPANY 1-10, (said names being fictitious and unknown), JOHN DOE'S 1-10, (said names being fictitious and unknown) JOE DOE'S 1-10, (said names being fictitious and unknown) DEF COMPANY 1-10, (said name being fictitious and unknown) and GHI COMPANY 1- 10, (said names being fictitious and unknown). Defendant(s).	SUPERIOR COURT OF NEW JERSEY LAW DIVISION - MORRIS COUNTY DOCKET NO. MRS-L- 1581-14 <i>CIVIL ACTION</i> <u>COMPLAINT & JURY DEMAND</u> and DEMAND FOR CERTIFIED ANSWERS TO UNIFORM INTERROGATORIES AND OTHER RELATED DOCUMENTS WITHIN SIXTY (60) DAYS OF SERVICE OF THE WITHIN COMPLAINT IN LIEU OF SERVICE OF SAME PURSUANT TO RULE 4:17-1, 2 AND 4, ET SEQ., DEMAND FOR INSURANCE POLICIES PURSUANT TO RULE 4:10-2(B), DESIGNATION OF TRIAL COUNSEL AND ATTORNEY'S CERTIFICATION PURSUANT TO RULE 4:5-1
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Plaintiff, JESSICA A. GREANEY and JOSEPH GREANEY her husband, both
residing at 45 Hillcrest Drive, County of Morris, Morristown, State of New Jersey,
complaining of the above named defendants, say that:

FIRST COUNT:

1. At all times mentioned herein the defendants 140 WASHINGTON STREET LLC and

or JOHN DOE 1-10 (said name being fictitious and unknown) jointly, severally or alternatively owned and/or leased certain premises commonly known as 140 Washington Street, Morristown, New Jersey together with a certain sidewalk and/or walkway and the trees, shrubbery outdoor lighting and other landscaping and appurtenances thereto.

2. At all times mentioned herein the premises 140 Washington Street, Morristown, New Jersey (hereinafter referred to as the "Premises") was located on the corner of Washington Street and Hillcrest Avenue in Morristown, New Jersey. The northerly side of the premises fronts on Washington Street and the easterly side of the premises fronts on Hillcrest Avenue.

3. At all times mentioned herein the defendants TOWN OF MORRISTOWN owned the public thoroughfare known as Washington Street and Hillcrest Avenue located in Morristown, New Jersey and the sidewalks and or trees and or lighting poles abutting those public thoroughfares and specifically at or near the premises known as 140 Washington Street, Morristown, New Jersey.

4. At all times mentioned herein and prior thereto, the defendants, VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L A/K/A FIRST ENERGY, ABC COMPANY 1-10 (said names being fictitious and unknown), and/or by their servants, agents or employees jointly, severally or alternatively owned, managed, maintained and/or leased and/or operated certain telephone wires, cable wires, electrical wires, guide wires, utility wires and/or utility equipment, lights and/or lighting equipment attached to and/or in contact with a certain telephone pole bearing marker numbers 0863M, 70, 65K OSMOE HSP 2010, adjacent to the Hillcrest Avenue side of 140 Washington Street, which is a public thoroughfare, in the Town of Morristown, County of Morris State of New Jersey.

5. On November 16, 2012 at approximately 5:40 a.m. plaintiff JESSICA A. GREANEY,

a resident of Hillcrest Avenue was a lawful pedestrian at or near the premises on the sidewalk and/or street in the aforesaid location when she was caused to trip and fall over a wire and/or debris thereby proximately causing the plaintiff JESSICA A. GREANEY to sustain severe and traumatic permanent injuries on November 16, 2012.

6. At all times mentioned herein and prior thereto, the defendants, 140 WASHINGTON STREET, LLC, TOWN OF MORRISTOWN, VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L A/K/A FIRST ENERGY, ABC COMPANY 1-10 (said names being fictitious and unknown), and or JOHN DOE 1-10 (said name being fictitious and unknown) and/or by their servants, agents or employees jointly, severally or alternatively, individually or by their servants, agents or employees, constructed, maintained, controlled, cleaned, repaired, supervised, inspected and had a duty to properly maintain the aforesaid premises and the appurtenances thereto including but not limited to all trees, brush, debris, telephone wires, cable wires, electrical wires, guide wires, utility wires and/or utility equipment, lights and/or lighting equipment attached to and/or in contact with a certain telephone pole bearing marker numbers 0863M, 70, 65K OSMOE HSP 2010, adjacent to the Hillcrest Avenue side of 140 Washington Street, Morristown, County of Morris, State of New Jersey and had a duty to provide the plaintiff, JESSICA A. GREANEY, with a safe manner of ingress and egress from the premises.

7. At all times mentioned herein, the defendants, JOE DOE'S 1-10 (said names being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown), GHI COMPANY 1-10 (said names being fictitious and unknown), were acting as the servants, agents, contractors, subcontractors or employees of the defendants, 140 WASHINGTON STREET, LLC, TOWN OF MORRISTOWN, VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L A/K/A FIRST ENERGY, ABC COMPANY 1-10 (said names being

fictitious and unknown), and or JOHN DOE 1-10 (said name being fictitious and unknown) to provide inspection services, tree cutting, utility work, storm clean up, management services, maintenance services, sub-contracting services, inspection services, repair services, renovation services, installation services, construction services at or near the aforesaid premises and/or supervised the subject work at the premises.

8. At all times mentioned herein and prior thereto, the defendants, 140 WASHINGTON STREET, LLC, TOWN OF MORRISTOWN, VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L A/K/A FIRST ENERGY, ABC COMPANY 1-10 (said names being fictitious and unknown), and or JOHN DOE 1-10 (said name being fictitious and unknown) JOE DOE'S 1-10 (said name being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and GHI COMPANY 1-10 (said names being fictitious and unknown) and/or by their servants, agents or employees jointly, severally or alternatively, individually or by their servants, agents or employees, were careless and negligent and acted in a palpably unreasonable manner in the ownership, management, leasing, construction, maintenance, control, repair, cleaning, operation and inspection of the aforesaid premises/sidewalk and or roadway where the accident took place; in creating and maintaining a dangerous and hazardous condition, in failing to provide proper and adequate lighting, in allowing a wire to remain in the roadway, in failing to warn the general public and the plaintiff of the dangerous condition, in allowing debris to remain on the sidewalk and in the roadway, in failing to furnish the plaintiff JESSICA A. GREANEY with proper means of ingress and egress, created and/or maintained a nuisance and/or trap in connection with the aforesaid premises and by reason of the foregoing acts and/or omissions, any or all, proximately causing the plaintiff JESSICA A. GREANEY to sustain severe and traumatic injuries on November 16, 2012.

9. The accident in question and the injuries sustained by the plaintiff, JESSICA A. GREANEY related thereto, did occur without any negligence on the part of the plaintiff, JESSICA A. GREANEY, which would bar plaintiff's recovery against the defendants 140 WASHINGTON STREET, LLC, TOWN OF MORRISTOWN, VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L A/K/A FIRST ENERGY, ABC COMPANY 1-10 (said names being fictitious and unknown), and or JOHN DOE 1-10 (said name being fictitious and unknown) JOE DOE'S 1-10 (said name being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and GHI COMPANY 1-10 (said names being fictitious and unknown) in the within cause of action.

10. The plaintiffs have complied with the requirements of N.J.S.A. 59:8-3 by filing a Notice of Claim with defendant TOWN OF MORRISTOWN and are entitled to bring the within claim in accordance with the provisions of the New Jersey Tort Claims Act, N.J.S.A. 59:1-1, et. seq. (if applicable hereto).

11. By reason of the aforesaid, the plaintiff JESSICA A. GREANEY was severely and permanently injured, was obliged to incur medical expenses related to her injuries, and suffered great pain and anguish.

WHEREFORE, the plaintiff, JESSICA A. GREANEY, hereby demands judgment against the defendants, 140 WASHINGTON STREET, LLC, TOWN OF MORRISTOWN, VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L A/K/A FIRST ENERGY, ABC COMPANY 1-10 (said names being fictitious and unknown), and or JOHN DOE 1-10 (said name being fictitious and unknown) JOE DOE'S 1-10 (said name being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and GHI COMPANY 1-10 (said names being fictitious and unknown) jointly, severally or alternatively, individually, for

damages, together with interest and costs of suit.

SECOND COUNT:

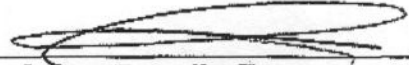
1. Plaintiff, JOSEPH GREANEY, repeats and realleges all of the allegations of the First Count and makes same part hereof as though set forth at length herein and in addition thereto, he alleges that he was at all times and still is the husband of the plaintiff, JESSICA A. GREANEY, residing with her at the same address.

2. By reason of the aforesaid, the plaintiff, JOSEPH GREANEY, was obliged to incur large expenses in the care and treatment of his wife, the plaintiff, JESSICA A. GREANEY, and will be so obliged in the future and he was and will in the future be substantially deprived of her usual services, society, earnings, consortium and companionship.

WHEREFORE, the plaintiff, JOSEPH GREANEY, demands judgment against the defendants, 140 WASHINGTON STREET, LLC, TOWN OF MORRISTOWN, VERIZON NEW JERSEY INC., CABLEVISION SYSTEMS, JCP&L A/K/A FIRST ENERGY, ABC COMPANY 1-10 (said names being fictitious and unknown), and or JOHN DOE 1-10 (said name being fictitious and unknown) JOE DOE'S 1-10 (said name being fictitious and unknown), DEF COMPANY 1-10 (said names being fictitious and unknown) and GHI COMPANY 1-10 (said names being fictitious and unknown) jointly, severally or alternatively, individually, for damages, together with interest and cost of suit.

LEONARD & LEONARD, P.A.
Attorneys for Plaintiff(s)

By: _____

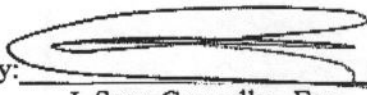

J. Sean Connelly, Esq.

Dated: June 12, 2014

JURY DEMAND:

Plaintiff(s) hereby demand(s) a Trial by jury on all issues set forth herein.

LEONARD & LEONARD, P.A.
Attorneys for Plaintiff(s)

By: 

J. Sean Connelly, Esq.

Dated: June 12, 2014

**DEMAND FOR CERTIFIED ANSWERS TO UNIFORM INTERROGATORIES AND
OTHER RELATED DOCUMENTS WITHIN SIXTY (60) DAYS OF SERVICE OF THE
WITHIN COMPLAINT IN LIEU OF SERVICE OF SAME PURSUANT TO RULE 4:17-1,2
and 4 et seq. and DEMAND FOR INSURANCE POLICES PURSUANT TO RULE 4:10-2(b)**

Pursuant to Rule 4:17-1, 2 and 4 et seq., the plaintiff hereby demands that the defendants upon whom this pleading is served, furnish fully responsive and certified answers to Uniform Interrogatories, Rules of Court, Appendix II, Form C and C1, together with the attachments required therein, within sixty (60) days of the service of the within Complaint, together with copies of the applicable insurance policies available to the defendants named herein pursuant to Rule 4:10-2(b).

LEONARD & LEONARD, P.A.
Attorneys for Plaintiff(s)

By: 

J. Sean Connelly, Esq.

Dated: June 12, 2014

DESIGNATION OF TRIAL COUNSEL

Please take notice that J. Sean Connelly, Esq., of the Law Firm of Leonard & Leonard, P.A., is hereby designated trial counsel on the within matter.

LEONARD & LEONARD, P.A.
Attorneys for Plaintiff(s)

By: 

J. Sean Connelly, Esq.

Dated: June 12, 2014

ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not binding Arbitration Pro-
cedure.
CLERK'S COUNTY
FILE DIVISION

ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not binding Arbitration Pro-
cedure Act.
CLERK'S COUNTY COURT DIVISION

RECEIVED & FILED
CLERK OF DISTRICT COURT
JAN 11 1961
COUNTY OF HARRIS
JULIA DIVISION

- ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not subject to the
binding Arbitration Procedure
relates.
- RECEIVED & FILED
CLERK OF DISTRICT COURT
JULY 10 1968
HARRIS COUNTY
FILE DIVISION

ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not binding Arbitration Pro-
cedure Act.
CLERK'S COUNTY
FILE DIVISION

- ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not binding Arbitration Pro-
cedure Act.
CLERK'S COUNTY COURT DIVISION

ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not binding Arbitration Pro-
cedure Act.
CLERK'S COUNTY COURT DIVISION

- ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not binding Arbitration Pro-
cedure Act.
CLERK'S COUNTY COURT DIVISION

RECEIVED & FILED
CLERK OF DISTRICT COURT
JULY 11 1961
COUNTY OF HARRIS
TEXAS

- ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not subject to the
binding Arbitration Procedure
relates.
- RECEIVED & FILED
CLERK OF DISTRICT COURT
JULY 10 AM 1978
HARRIS COUNTY
CIVIL DIVISION

ACTIONS) I, the undersigned,
of, and except as hereinafter
in pleading is not binding Arbitration Pro-
cedure Act.
COUNTY OF HARRIS COUNTY
TARRANT DIVISION

RECEIVED & FILED
CLERK OF DISTRICT COURT
JULY 11 1961
COUNTY OF HARRIS
TEXAS
JUL 11 1961
CLERK OF DISTRICT COURT

CERTIFICATION ATTACHMENT

RECEIVED & FILED
SUPERIOR COURT
2014 JUN 24 A 11:39
MORRIS COUNTY
CIVIL DIVISION

1. OTHER ACTIONS PENDING?

- A. If YES-Parties to other Pending Actions.
- B. In my opinion, the following parties should be joined in the within pending Cause of Action.

2. OTHER ACTION CONTEMPLATED?

- A. If YES-Parties contemplated to be joined in other Cause of Action.

3. ARBITRATION PROCEEDINGS PENDING?

- A. If YES-Parties to Arbitration Proceedings.
- B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings.

4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED?

- A. If YES-Parties contemplated to be joined to Arbitration proceedings.

WHEN APPLICABLE, (in connection with Automobile Accident Cases), IT IS CONTEMPLATED THAT A CLAIM FOR ARBITRATION WILL BE FILED AGAINST ANY PARTY WHO IS UNINSURED OR IS UNDER-INSURED.

Dated: June 12, 2014
(Cert. 4:5-1 Attachment)