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OCT 20 2014

TOWN OF MORRISTOWN
TOWN CLERK'S OFFICE

Claudia A. Reis (Bar ID#024042001)
LENZO & REIS, LLC
360 Mount Kemble Avenue, Suite 1004
Morristown, NJ 07960
(973) 845-9922
Attorneys for Plaintiff

MARTHA BETANCOURT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff	:	MORRIS COUNTY
	:	
v.	:	DOCKET NO. MRS-L-2450-14
	:	
TOWN OF MORRISTOWN,	:	Civil Action
	:	
Defendant.	:	SUMMONS
	:	

From The State of New Jersey To The Defendant Named Above: **TOWN OF MORRISTOWN**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense. If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment. If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is

available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Name of Defendant to be Served: **TOWN OF MORRISTOWN**
200 SOUTH STREET
MORRISTOWN, NJ 07960
c/o MATTHEW STECHAUNDER, CLERK

s/ Michelle M. Smith
Clerk of the Superior Court

Dated: October 17, 2014

ATLANTIC COUNTY:

Lori Mooney, Clerk
Civil Division, Direct Filing
1201 Bacharach Blvd., 1st Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Kathleen A. Donovan, Clerk
119 Justice Center
10 Main Street
Hackensack, NJ 07601-7698
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Edward A. Kelly, Jr., Clerk
First Fl., Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:

Michael S. Keating, Clerk
1st Fl., Hall of Justice
101 S. Fifth Street
Camden, NJ 08103
LAWYER REFERRAL
(609) 964-4520
LEGAL SERVICES
(609) 964-2010

CAPE MAY COUNTY:

Angela F. Pulvino, Clerk
(Law Division Filings)
7 N. Main Street-Box 203
Cape May Court House, NJ
08210-3096
or
(General Equity Filings)
Box DN-209A
Cape May Court House, NJ
08201-3096
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Theresa L. Van Sant, Clerk
Court House, Direct Filing
Broad & Fayette Sts.
Bridgeton, NJ 08302
LAWYER REFERRAL
(609) 692-6207
LEGAL SERVICES
(609) 825-6090

ESSEX COUNTY:

Patricia McGarry Drake, Clerk
247 Hall of Records
465 Dr. Martin Luther King,
Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(201) 622-6207
LEGAL SERVICES
(201) 624-4500

GLOUCESTER COUNTY:

Joseph H. Hoffman, Clerk
First Fl., Court House
1 N. Broad St, P.O. Box 129
Woodbury, NJ 08096
LAWYER REFERRAL
(609) 848-4589
LEGAL SERVICES
(609) 848-5360

HUDSON COUNTY:

Frank E. Rodgers, Clerk
Superior Court, Civil Records
Dept.
Brennan Court House
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Dorothy K. Tirpik, Clerk
Hall of Records
71 Main Street
Flemington, NJ 08822
LAWYER REFERRAL
(609) 788-6112
LEGAL SERVICES
(609) 782-7979

MERCER COUNTY:

Albert E. Driver, Jr., Clerk
P.O. Box 8068
209 South Broad Street
Trenton, NJ 08650
LAWYER REFERRAL
(609) 890-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:

Herbert P. Lashomb, Clerk
Court House, East Wing
Lobby Floor
1 Kennedy Sq., PO Box 2633
New Brunswick, NJ 08903-
2633
LAWYER REFERRAL
(908) 828-0053
LEGAL SERVICES
(908) 249-7600

MONMOUTH COUNTY:

Jane Clayton, Clerk
P.O. Box 1252
Court House, West Wing
Freehold, NJ 07728-1252
LAWYER REFERRAL
(908) 431-5544
LEGAL SERVICES
(908) 747-7400

MORRIS COUNTY:

Alphonse W. Scerbo, Clerk
P.O. Box 900
30 Schuyler Pl.
Morristown, NJ 07960
LAWYER REFERRAL
(201) 267-5882
LEGAL SERVICES
(201) 285-6911

OCEAN COUNTY:

M. Dean Haines, Clerk
119 Court House
CN-2191
Toms River, NJ 08754
LAWYER REFERRAL
(908) 240-3666
LEGAL SERVICES
(908) 341-2727

PASSAIC COUNTY:

William L. Kattak, Clerk
Court House
77 Hamilton St.
Paterson, NJ 07505
LAWYER REFERRAL
(201) 278-9223
LEGAL SERVICES
(201) 345-7171

SALEM COUNTY:

John W. Cawman, Clerk
92 Market St., P.O. Box 18
Salem, NJ 08079
LAWYER REFERRAL
(609) 678-8363
LEGAL SERVICES
(609) 451-0003

SOMERSET COUNTY:

R. Peter Widin, Clerk
Civil/General Equity
New Court House, 3rd Fl.
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Helen C. Ackerman, Clerk
Superior Court, Law Division
49 High Street
Newton, NJ 07860
LAWYER REFERRAL
(201) 267-5882
LEGAL SERVICES
(201) 383-7400

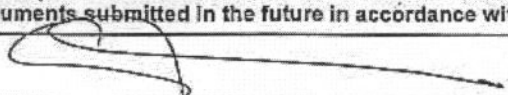
UNION COUNTY:

Walter G. Halpin, Clerk
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Terrence D. Lee, Clerk
Court House, Room 118
2nd and Hardwick Streets
Belvidere, NJ 07823
LAWYER REFERRAL
(201) 267-5882
LEGAL SERVICES
(201) 475-2010

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 Claudia A. Reis, Esq.		TELEPHONE NUMBER (973) 845-9922		COUNTY OF VENUE Morris	
FIRM NAME (if applicable) Lenzo & Reis, LLC				DOCKET NUMBER (when available) MRS-L-2450-14	
OFFICE ADDRESS 360 Mount Kemble Ave., Ste 1004 Morristown, NJ 07960		DOCUMENT TYPE Complaint			
		JURY DEMAND ☒ Yes ☐ No			
NAME OF PARTY (e.g., John Doe, Plaintiff) Martha Betancourt		CAPTION MARTHA BETANCOURT v. TOWN OF MORRISTOWN			
CASE TYPE NUMBER (See reverse side for listing) 618		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 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?			
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: 					

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 SEP 30 2011
 CLERK'S OFFICE
 MORRIS COUNTY



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
- 278 ZOMETHA/AREXIA
- 279 GADOLINIUM

- 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL
- 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

Claudia A. Reis (Bar ID#024042001)
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360 Mount Kemble Avenue, Suite 1004
Morristown, NJ 07960
(973) 845-9922
Attorneys for Plaintiff

RECEIVED & FILED
SUPERIOR COURT
2014 SEP 30 P 1:33
MORRIS COUNTY
CIVIL DIVISION

MARTHA BETANCOURT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff	:	MORRIS COUNTY
	:	
v.	:	DOCKET NO. MRS-L- 2450-14
	:	
	:	Civil Action
	:	
TOWN OF MORRISTOWN,	:	
	:	COMPLAINT AND JURY DEMAND
Defendant.	:	

Martha Betancourt says the following by way of Complaint against defendant:

THE PARTIES

1. Plaintiff Martha Betancourt ("Plaintiff" or "Ms. Betancourt") currently resides in the Town of Morristown, County of Morris, State of New Jersey. At all times relevant to this Complaint, Plaintiff was employed by the Town of Morristown as an Administrative Assistant in the Town of Morristown's Zoning Department and reported directly to Zoning Officer John Fugger.

2. Defendant Town of Morristown ("Morristown" or "Town") is a municipality in Morris County, New Jersey. At all times relevant to this Complaint, defendant Town of Morristown employed plaintiff and John Fugger.

FACTUAL ALLEGATIONS

3. Beginning in or around approximately 2009, John Fugger began sexually harassing and stalking plaintiff, including but not limited to:
 - a. Repeatedly asking her to go out with him for coffee, lunch or a walk on the beach;
 - b. Staring at her;
 - c. Following her both during work and non-work hours – sometimes on a regular daily basis;
 - d. Calling her family members;
 - e. Getting upset if men spoke to plaintiff in the regular course of her job duties while at work;
 - f. Demanding that she thought she was too good for him when she refused his advances;
 - g. Incessantly calling her on her personal cell phone during non-work hours and on weekends.
4. Despite her repeated pleas that Fugger leave her alone and stop bothering her, Fugger continued to harass plaintiff.
5. In or around 2009, plaintiff advised Town Inspector Helen Arnold that Fugger had been following her.
6. In response, Inspector Arnold advised plaintiff that Fugger had discussed plaintiff's marriage with Ms. Arnold.
7. Finally, in or around August or September 2009, plaintiff advised Town Planner Michael D'Altilio about the harassment to which she was being subjected by Fugger.
8. On or around September 2, 2009, Town Planner D'Altilio advised Town Administrator Michael Rogers and Director of Public Works/Town Engineer Jeffrey Hartke that Fugger's behavior toward plaintiff constituted sexual harassment.

9. During that conversation, Mr. D'Altilio also advised Messrs. Rogers and Hartke that Fugger appeared to be intoxicated at work and appeared for work smelling of alcohol.

10. Upon information and belief, the Town took no action in response to Mr. D'Altilio's expressed concerns.

11. In or around early January 2010, Fugger called plaintiff's husband and advised him that she had attended Mayor Dougherty's inaugural party with a male implying that she was having an affair.

12. In or around January 7, 2010, Town Planner D'Altilio confirmed, via e-mail to Town Administrator Rogers, the September 2, 2009, conversation during which Mr. D'Altilio explained that Fugger was sexually harassing plaintiff.

13. Upon information and belief, the Town took no action in response to Mr. D'Altilio's expressed concerns.

14. In February 2010, Fugger called plaintiff's sister and accused plaintiff of being a "fucking bitch" who "flirts with everyone here."

15. When plaintiff confronted Fugger, he initially denied having called plaintiff's sister but ultimately admitted that he had been the caller.

16. As a result, plaintiff complained to Town Engineer Hartke about the harassment to which she was subjected by Fugger after Fugger's call to plaintiff's sister.

17. As a result of plaintiff's 2010 complaint, Fugger was suspended for two (2) weeks.

18. Fugger began harassing plaintiff again a few months after returning from his suspension and continued to do so throughout the ensuing years.

19. In January 2012, while returning to Morristown with a male friend in a car after performing community service, plaintiff discovered that Fugger was following the car in which she was riding.

20. After being confronted by plaintiff, Fugger denied that he was following her and falsely claimed that he was performing inspections.

21. Plaintiff contacted Housing Inspector Tom Alexander who confirmed that the necessary inspections had already been completed and that there were no inspections scheduled for the address of the parking lot plaintiff had entered.

22. When confronted with the fact that plaintiff had confirmed that he was not performing inspections, Fugger became angry.

23. Throughout early 2012, Fugger continued to repeatedly call plaintiff on her cell phone multiple times a day during no work hours and sometimes late into the night on the weekends.

24. On a Friday night in early 2012, plaintiff called Morristown's Mayor Timothy Dougherty and begged him to intercede on her behalf with regard to Fugger's harassment.

25. On a Monday in early 2012, plaintiff was called into a meeting with Mayor Dougherty and the Town's counsel during which time she made a formal statement about the constant harassment to which she was subjected and insisted that she wanted Fugger to stop and leave her alone.

26. After plaintiff's complaint, Mayor Dougherty's behavior and attitude toward plaintiff changed.

27. Upon information and belief, the only action taken in response to plaintiff's early 2012 complaint is that Fugger was told to stop.

28. On or about October 1, 2012, between the hours of 9:00 pm and approximately midnight, Fugger called plaintiff thirteen (13) times and left various voicemail messages on plaintiff's cell phone.

29. During such calls, he left voice mail messages during which he angrily accused plaintiff of being a liar, being "too fucking busy" to return his calls or talk to him, not having the "guts" to talk to him, being "too good" to talk to him, being "bitchy", and having sexual relations with a man other than her husband.

30. In those voicemail messages, he also demanded to know why she would not talk to him anymore, advised her to leave her job if she did not like it, falsely accused plaintiff of disrespecting him and threatened plaintiff that "[w]hat comes around, goes around" and that he was "going to stress [her] life out until [she] told him the truth".

31. When plaintiff returned to work the following day, she complained, again, to Town Engineer Hartke who directed her to the Town's Equal Employment Office ("EEO").

32. As a result, plaintiff filed a complaint with EEO and police report against Fugger.

33. Defendant Morristown finally conducted an investigation into plaintiff complaints of sexual harassment a result of her filing of a police report.

34. After she filed the EEO complaint and police report, the Town temporarily removed plaintiff from the workplace but allowed Fugger to continue working.

35. When plaintiff returned to work on October 4, 2012, she answered her telephone in the regular course of her duties at approximately 1:30 p.m. but the caller, who was identified as Fugger by the caller id, refused or failed to speak.

36. As a result, plaintiff again complained to Town Engineer Hartke who advised her to go to the police department.

37. Despite his continual sexual harassment for years and the Town's knowledge of that harassment, the Town did not terminate Fugger's employment but, instead, permitted him to resign thereby enabling him to collect unemployment and his pension.

38. On November 15, 2012, and November 16, 2012, plaintiff received approximately five phone calls from a blocked number, which is what Fugger often did – four of which were made after 10:00 p.m. on those dates.

39. On November 17, 2012, Fugger left plaintiff yet another voicemail message in which he "apologize[d] for everything, for hurting [her]" and advised that he would "leave Morristown peacefully."

40. On January 29, 2013, in an attempt to further embarrass and humiliate plaintiff, the Town released to members of the press an official statement concerning Fugger's resignation in which the Town falsely (i) accused plaintiff of failing to utilize remedial measures intended to prevent harassment, and (ii) alleged that it did not know of and could not investigate the sexual harassment to which plaintiff was subjected as a result of plaintiff's failure to cooperate in the investigation.

41. While the January 29, 2013, press release did not identify plaintiff by name, it was well known to Town employees and some residents that plaintiff was the target of the incidents involving Fugger.

42. On or about February 7, 2013, the Honorable James D. Bride, J.M.C. entered an Order prohibiting Fugger from having any contact with, attempting to contact or following plaintiff or any member of her family.

43. On July 23, 2013, plaintiff retrieved a voicemail message on her work voicemail at the Town advising that a naked man was in the shower at plaintiff's address. Several

individuals identified the voice of the caller as that of Fugger and Detective Christopher Oakely advised plaintiff that the Town believed the message was left by Fugger.

44. While plaintiff saved the voicemail message, on or around Wednesday, July 24, 2013, plaintiff learned that, after regular business hours, Captain Saranelli went into the back office where her desk and phone are located and accessed and deleted Fugger's voicemail message thereby destroying evidence of its existence.

45. The Town refused to conduct any further investigation into Fugger's continued harassment despite plaintiff's insistence that she was concerned about her safety and well-being and the Town's knowledge that a no contact order had been in force since March 7, 2013.

46. Prior to Fugger's resignation, the Town had never provided sexual harassment training to nonsupervisory employees, including but not limited to plaintiff.

47. Fugger's conduct caused plaintiff to fear for her personal safety.

FIRST COUNT

HARASSMENT, HOSTILE WORK ENVIRONMENT, AND DISCRIMINATION IN VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

48. Plaintiff repeats all of the foregoing allegations as if fully set forth herein.

49. Defendant violated the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq., by harassing and discriminating against plaintiff on the basis of her gender, which unlawful conduct was both severe and pervasive, and constituted a hostile work environment.

50. As a result of defendant's unlawful conduct, plaintiff has suffered and continues to suffer economic losses, emotional distress, harm to career, harm to reputation, and other such damages compensable under the New Jersey Law Against Discrimination.

WHEREFORE, plaintiff demands judgment against defendant for the following:

- a. Compensatory damages;

- b. Consequential damages;
- c. Punitive damages;
- d. Attorneys' fees with enhancement;
- e. Costs of suit;
- f. Pre-judgment and post-judgment interest; and
- g. Such other relief as the Court may deem equitable and just.

SECOND COUNT

RETALIATION IN VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

51. Plaintiff repeats all of the foregoing allegations as if fully set forth herein.

52. Defendant violated the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq., by retaliating against plaintiff for opposing the unlawful harassment and discrimination on the basis of her gender and the hostile work environment to which she was subjected by Fugger.

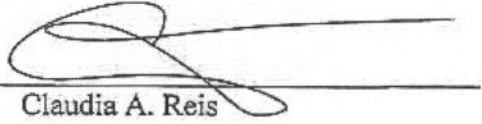
53. As a result of defendant's unlawful conduct, plaintiff has suffered and continues to suffer economic losses, emotional distress, harm to career, harm to reputation, and other such damages compensable under the New Jersey Law Against Discrimination.

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- a. Compensatory damages;
- b. Consequential damages;
- c. Punitive damages;
- d. Attorneys' fees with enhancement;
- e. Costs of suit;
- f. Pre-judgment and post-judgment interest; and

- g. Such other relief as the Court may deem equitable and just.

LENZO & REIS, LLC
Attorneys for Plaintiff

By: 

Claudia A. Reis

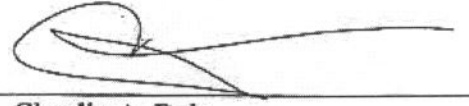
Dated: September 29, 2014

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all issues subject to trial by jury.

LENZO & REIS, LLC
Attorneys for Plaintiff

By: _____

A handwritten signature in dark ink, appearing to be 'C. A. Reis', written over a horizontal line.

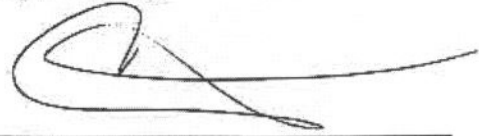
Claudia A. Reis

Dated: September 29, 2014

DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Claudia A. Reis as her trial counsel.

LENZO & REIS, LLC
Attorneys for Plaintiff

A handwritten signature in black ink, appearing to be 'C. Reis', written over a horizontal line.

By: _____

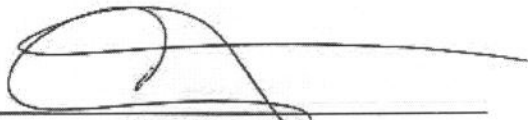
Claudia A. Reis

Dated: September 29, 2014

CERTIFICATION

I hereby certify that to the best of my knowledge, this matter is not the subject of any other action pending in any court or a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated at this time. I further certify that to the best of my knowledge, there are no non-parties who should be joined in this action at this time.

LENZO & REIS, LLC
Attorneys for Plaintiff

By: 

Claudia A. Reis

Dated: September 29, 2014

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: OCTOBER 01, 2014
RE: BETANCOURT VS TOWN OF MORRISTOWN
DOCKET: MRS L -002450 14

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 ROBERT J. BRENNAN

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: CLAUDIA A. REIS
LENZO REIS LLC
360 MY KEMBLE AVE STE 1004
MORRISTOWN NJ 07960

JUXPOS1

Claudia A. Reis (Bar ID#024042001)
LENZO & REIS, LLC
360 Mount Kemble Avenue, Suite 1004
Morristown, NJ 07960
(973) 845-9922
Attorneys for Plaintiff

MARTHA BETANCOURT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff	:	MORRIS COUNTY
	:	
v.	:	DOCKET NO. MRS-L-2450-14
	:	
	:	Civil Action
	:	
TOWN OF MORRISTOWN,	:	
	:	PLAINTIFF'S FIRST SET OF
Defendant.	:	INTERROGATORIES
	:	

TO: Town of Morristown
200 South Street
Morristown, NJ 07960

PLEASE TAKE NOTICE that plaintiff requires of defendant answers under oath or certification to the following interrogatories within the time prescribed by law.

INSTRUCTIONS

In responding to these interrogatories, furnish all information available to defendant, including information in the possession of defendant's attorneys, investigators, and all other persons acting on defendant's behalf, and not merely such information that is within defendant's personal knowledge.

Defendant and defendant's attorneys are required to supplement promptly the answers to these interrogatories as new information comes to their attention.

As used herein, the term "person" means natural persons, corporations, partnerships, sole proprietorships, unions, associations, or any other kind of entity.

As used herein, a "document" means any printed, typewritten, handwritten, or otherwise recorded matter of whatever character, including but not limited to letters, books, forms, memoranda, charts, graphs, reports, notes, diaries, minutes, calendars, photographs, audiotapes, videotapes, facsimiles, motion pictures, transcripts, computer discs, compact discs, electronic mail, and voice mail, as well as copies of any such material if defendant do not have custody or control of the original. If there is more than one version of a document and the versions differ in any way, any request for documents contained herein requests all such versions.

In each interrogatory wherein defendant is asked to "identify" a person, state the person's name, last known address, last known telephone number, and last known e-mail address.

In each interrogatory wherein defendant are asked to "identify" and/or "describe" any document, state with respect to each such document the date on which the document was created, the nature of the document's content, the name, last known address, last known telephone number, and last known e-mail address of the person who created the document, and the name, last known address, last known telephone number, and last known e-mail address of the person who currently possesses or controls the document.

If defendants claim a privilege with regard to any information or document requested herein, state the nature of the privilege claimed and provide the specific factual basis for asserting the privilege as to the particular information or document at issue.

LENZO & REIS, LLC

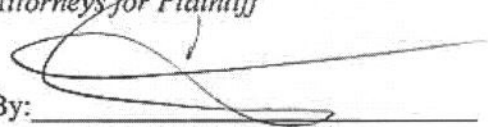
360 Mt. Kemble Avenue, Suite 1004

Morristown, New Jersey 07960

973-845-9922

Attorneys for Plaintiff

Dated: October 17, 2014

By: 

CLAUDIA R. REIS

INTERROGATORIES

1. State the name, last known address, last known telephone number, and last known e-mail address of all persons who have knowledge of facts relating in any way to this matter, and specify the subject matter of each such person's knowledge.

2. List chronologically each job title held by plaintiff while employed by defendant, indicating the time period during which each position was held.

3. For any position held by plaintiff while employed by defendant for which there is no job description, describe with specificity the job functions of each such position.

4. State the required qualifications and skills for each and every job title that plaintiff held while employed by defendant.

5. State whether plaintiff was ever promoted while employed by defendant. For each promotion, state the following:

- a. from what position or job title plaintiff was promoted and to what position or job title plaintiff was promoted;
- b. the date of the promotion;
- c. the reason(s) for the promotion;
- d. the names, last known addresses, last known telephone numbers, last known e-mail addresses, job titles, and gender of all persons involved in the decision-making process and the nature and extent of their involvement in the decision; and
- e. the criteria used in making the decision.

6. State whether plaintiff was ever demoted while employed by defendant. For each demotion, state the following:

- a. from what position or job title plaintiff was demoted and to what position or job title plaintiff was demoted;
- b. the date of the demotion;
- c. the reason(s) for the demotion;
- d. the names, last known addresses, last known telephone numbers, last known e-mail addresses, job titles, and gender of all persons involved in the decision-making process and the nature and extent of their involvement in the decision; and
- e. the criteria used in making the decision.

7. Specify the form and substance of any and all compensation that defendant provided to plaintiff (including but not limited to salary, wages, bonuses, commissions, employee benefits, and retirement benefits) for each year of plaintiff's employment.

8. If defendant contends that it is not liable for the acts and omissions of any other person involved in this matter, state with particularity each and every fact in support of that contention.

9. Set forth the complete factual basis for each and every defense asserted by defendant.

10. State whether plaintiff either formally or informally made an internal complaint of discrimination or harassment on the basis of gender or hostile work environment at any time while employed by defendant. If so, provide the following:

- a. the date of each such complaint;
- b. the nature and substance of each such complaint;
- c. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of the person(s) to whom the complaint was made; and
- d. a description of what, if anything, defendant did in response to each such complaint.

11. State whether defendant investigated plaintiff's internal complaints of discrimination and/or harassment. If so, provide the following:

- a. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of each individual who conducted or participated in the investigation;
- b. all findings or conclusions of the investigation;
- c. the time period during which the investigation occurred; and
- d. a description of all actions taken as a result of the investigation.

12. Provide the following information for each and every individual who has ever been supervised by John Fugger in an employment setting:

- a. name, last known address, last known telephone number, last known e-mail address, and gender;
- b. name, address, and telephone number of the employer for whom the person was working when supervised by defendant; and
- c. the time period during which defendant supervised the person.

13. State whether John Fugger has ever been disciplined in any way for discrimination and/or harassment on the basis of gender or for hostile work environment. If so, provide the following:

- a. name, address, and telephone number of the employer for whom John Fugger was working when the discipline occurred;
- b. a description of each such disciplinary action;
- c. a description of the reason for each such disciplinary action; and
- d. the date of each such disciplinary action.

14. State whether any person other than plaintiff has ever accused John Fugger of discrimination and/or harassment on the basis of gender or hostile work environment. If so, state the following:

- a. the name, last known address, last known telephone number, last known e-mail address, and gender of each such complainant;
- b. the name, address, and telephone number of the employer for whom the complainant was working when the alleged discrimination or harassment occurred;
- c. the date of each such complaint;
- d. the nature and substance of each such complaint; and
- e. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of the person(s) to whom the complaint was made.

15. State whether any person other than plaintiff has ever filed a complaint with the United States Equal Employment Opportunity Commission, the New Jersey Division on Civil Rights, or any other federal, state or local governmental agency charging John Fugger with discrimination and/or harassment on the basis of gender or hostile work environment. If so, provide the following:

- a. the name, last known address, last known telephone number, last known e-mail address, and gender of each such complainant;
- b. the title of each such complaint;
- c. the name and address of the governmental agency with which each such complaint was filed;
- d. the docket or agency number, if any, assigned to each such complaint;
- e. the date on which each such complaint was filed;
- f. the nature and substance of each such complaint; and
- g. the date and substance of any action taken by the governmental agency.

16. State whether any civil or criminal action has ever been filed in any court charging John Fugger with discrimination and/or harassment or hostile work environment. If so, provide the following for each such action:

- a. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of the complainant(s);
- b. the title of the action;
- c. the name and address of the court where the action was filed;
- d. the docket number of the action;
- e. the date on which the action was filed;
- f. the nature and substance of the action;
- g. the disposition or present status of the action;
- h. whether the case was tried and, if so, the verdict;
- i. the amount of punitive damages, if any; and
- j. the amount of compensatory damages, if any.

17. State whether any person other than plaintiff has ever accused defendant of discrimination and/or harassment on the basis of gender or hostile work environment. If so, state the following:

- a. the name, last known address, last known telephone number, last known e-mail address, and gender of each such complainant;
- b. the name, address, and telephone number of the employer for whom the complainant was working when the alleged discrimination or harassment occurred;
- c. the date of each such complaint;
- d. the nature and substance of each such complaint; and
- e. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of the person(s) to whom the complaint was made.

18. State whether any person other than plaintiff has ever filed a complaint with the United States Equal Employment Opportunity Commission, the New Jersey Division on Civil Rights, or any other federal, state or local governmental agency charging defendant with discrimination and/or harassment on the basis of gender or hostile work environment. If so, provide the following:

- a. the name, last known address, last known telephone number, last known e-mail address, and gender of each such complainant;
- b. the title of each such complaint;
- c. the name and address of the governmental agency with which each such complaint was filed;
- d. the docket or agency number, if any, assigned to each such complaint;
- e. the date on which each such complaint was filed;
- f. the nature and substance of each such complaint; and
- g. the date and substance of any action taken by the governmental agency.

19. State whether any civil or criminal action has ever been filed in any court charging defendant with discrimination and/or harassment on the basis of gender or hostile work environment. If so, provide the following for each such action:

- a. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of the complainant(s);
- b. the title of the action;
- c. the name and address of the court where the action was filed;
- d. the docket number of the action;
- e. the date on which the action was filed;
- f. the nature and substance of the action;
- g. the disposition or present status of the action;
- h. whether the case was tried and, if so, the verdict;
- i. the amount of punitive damages, if any; and
- j. the amount of compensatory damages, if any.

20. State whether any person other than plaintiff has ever accused defendant of retaliation. If so, state the following:

- a. the name, last known address, last known telephone number, last known e-mail address, and gender of each such complainant;
- b. the name, address, and telephone number of the employer for whom the complainant was working when the alleged discrimination or harassment occurred;
- c. the date of each such complaint;
- d. the nature and substance of each such complaint; and
- e. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of the person(s) to whom the complaint was made.

21. State whether any person other than plaintiff has ever filed a complaint with the United States Equal Employment Opportunity Commission, the New Jersey Division on Civil Rights, or any other federal, state or local governmental agency charging defendant with retaliation. If so, provide the following:

- a. the name, last known address, last known telephone number, last known e-mail address, and gender of each such complainant;
- b. the title of each such complaint;
- c. the name and address of the governmental agency with which each such complaint was filed;
- d. the docket or agency number, if any, assigned to each such complaint;
- e. the date on which each such complaint was filed;
- f. the nature and substance of each such complaint; and
- g. the date and substance of any action taken by the governmental agency.

22. State whether any civil or criminal action has ever been filed in any court charging defendant with retaliation. If so, provide the following for each such action:

- a. the name, last known address, last known telephone number, last known e-mail address, job title, and gender of the complainant(s);
- b. the title of the action;
- c. the name and address of the court where the action was filed;
- d. the docket number of the action;
- e. the date on which the action was filed;
- f. the nature and substance of the action;
- g. the disposition or present status of the action;
- h. whether the case was tried and, if so, the verdict;
- i. the amount of punitive damages, if any; and
- j. the amount of compensatory damages, if any.