

LAW OFFICES OF MARTIN F. KRONBERG
2401 MORRIS AVENUE
UNION, NEW JERSEY 07083
(908) 624-1660
Attorneys for Plaintiffs

JUDY REDWOOD and WILLIAM REDWOOD,
her husband,

Plaintiffs,

vs.

TOWN OF MORRISTOWN and JOHN DOES
1-10,

Defendants

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: MORRIS COUNTY

:
: Docket No. MRS-L-792-08

:
: CIVIL ACTION

:
: SUMMONS

FROM THE STATE OF NEW JERSEY, To The Defendant(s) Named Above:

TOWN OF MORRISTOWN

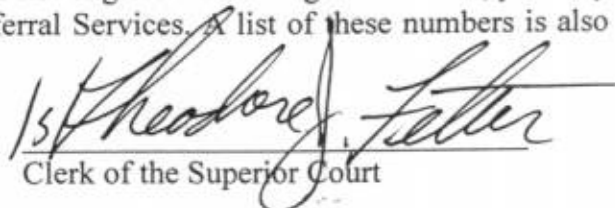
The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk 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 (the address of each deputy clerk of the Superior Court is provided).

If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$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. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

DATED: March 19, 2008


Clerk of the Superior Court

Name of Defendant to be served: Town of Morristown
Address: 200 South Street, Morristown, NJ 07963

LAW OFFICES OF MARTIN F. KRONBERG
2401 MORRIS AVENUE
UNION, NEW JERSEY 07083
(908) 624-1660
Attorney for Plaintiff

JUDY REDWOOD and WILLIAM
REDWOOD, her husband,

Plaintiff,

vs.

TOWN OF MORRISTOWN and
JOHN DOES 1-10,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY
DOCKET NO.: *L-792-08*

Civil Action

COMPLAINT AND DEMAND
FOR TRIAL BY JURY

Plaintiff, JUDY REDWOOD, residing in the Borough of Hamburg, County of
Sussex and State of New Jersey, complaining of the defendants, says:

FIRST COUNT

1. On or about the 7th day of July 2007, the plaintiff, Judy Redwood, was walking on and near a sidewalk at Lidgerwood Field, Town of Morristown, County of Morris, and State of New Jersey. Said premises are owned, operated, maintained and controlled by the defendants Town of Morristown and John Does 1-10. The defendants, John Does 1-10, are described as corporations, partnerships, persons or other entities who are presently unknown but who owned, operated, maintained and controlled the premises described herein.

2. The aforesaid premises were owned, operated, maintained and controlled by the defendants in such a negligent, careless and palpably unreasonable manner so as to cause the plaintiff, Judy Redwood, to trip and fall.

3. The defendants knew or should have known that the dangerous condition which existed on said premises created a serious degree of the likelihood of injury occurring to anyone

using said premises, including the plaintiff, Judy Redwood. Judy Redwood was caused to fall while on said premises due to the palpably unreasonable actions of defendants.

4. As a result of the aforesaid negligence and palpably unreasonable behavior of the defendants, the plaintiff, Judy Redwood, was caused to fall and sustained severe and permanent injuries to her person; suffered and will in the future suffer great pain and anguish; and expended sums, and will continue to expend sums, for medical care and treatment.

5. Defendants' negligence and carelessness and palpably unreasonable conduct was the sole and proximate cause of the injuries sustained by the plaintiff.

6. Proper notice was given within ninety days of the injury to the defendant Town of Morristown.

WHEREFORE, plaintiff, Judy Redwood, demands judgment against the defendants Town of Morristown and John Does 1-10 for damages together with interest and costs of suit.

SECOND COUNT

1. Plaintiffs repeat the allegations of the First Count as if set forth at length herein.

2. Plaintiff, William Redwood, is the husband of the Plaintiff, Judy Redwood.

3. Due to the wrongful actions of defendants, Plaintiff, William Redwood, has been deprived of the companionship, advice, and consortium of the Plaintiff, Judy Redwood.

WHEREFORE, Plaintiffs, Judy Redwood and William Redwood, her husband, demand judgment against the Defendants Town of Morristown and John Does 1-10 for damages together with interest and costs of suit.

DEMAND FOR TRIAL BY JURY

A trial by a jury is demanded in the within matter.

DESIGNATION OF TRIAL COUNSEL

Martin F. Kronberg, Esq., is hereby designated as trial counsel in the within matter on behalf of plaintiff.

CERTIFICATION PURSUANT TO RULE 4:5-1

I hereby certify that the within matter is not the subject matter of any other action pending in any court or of a pending arbitration proceeding, nor is such action contemplated. The names of all parties who should be presently joined in this action are named in the caption of this Complaint.

By:


MARTIN F. KRONBERG

DATED: March 10, 2008

CIVIL CASE INFORMATION STATEMENT (CIS)

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

FOR USE BY CLERKS OFFICE ONLY

PAYMENT TYPE CK CG CA

CHG/CK NO

AMOUNT

OVERPAYMENT

BATCH NUMBER:

ATTORNEY NAME
MARTIN F. KRONBERG

TELEPHONE NUMBER
908-624-1660

COUNTY OF VENUE:
MORRIS

FIRM NAME: _____

DOCKET NUMBER: 6-79708

OFFICE ADDRESS:
2401 MORRIS AVENUE
UNION, NEW JERSEY 07083

DOCUMENT TYPE:
Complaint

JURY DEMAND:
X YES NO

NAME OF PARTY:
PLAINTIFF, JUDY REDWOOD

CAPTION:
REDWOOD v. TOWN OF MORRISTOWN, et al.

CASE TYPE NUMBER:
605

IS THIS A PROFESSIONAL MALPRACTICE CASE YES X 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 X NO

IF YES, LIST DOCKET
NUMBERS

DO YOU ANTICIPATE ADDING ANY
PARTIES (arising out of same YES X NO
transaction or occurrence)

NAME OF DEFENDANT'S PRIMARY INSURANCE CARRIER:

 NONE X UNKNOWN

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

A. DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP YES X NO IF YES, IS THAT RELATIONSHIP EMPLOYER-EMPLOYEE FRIEND/NEIGHBOR OTHER (explain) FAMILIAL BUSINESS

B. DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? YES X 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 X No IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION

WILL AN INTERPRETER BE NEEDED Yes X No

IF YES, PLEASE IDENTIFY:

ATTORNEY SIGNATURE



RECEIVED & FILED
SUPERIOR COURT
CIVIL DIVISION
08 MAR 12 PM 3:09

AFFIDAVIT OF SERVICE

STATE OF NEW JERSEY
Superior Court Law Division,
Morris County
Docket / Index # MRS-L-792-08

JUDY REDWOOD
Plaintiff / Petitioner

VS.

TOWN OF MORRISTOWN
Defendant / Respondent

I declare that I am a citizen of the United States, over the age of eighteen and not a party to this action. And that within the boundaries of the state where service was effected. I was authorized by law to perform said service.

Service: I served **Town of Morristown**
with **Summons together with a copy of the Complaint in this action**
at **Town of Morristown, 200 South St, Morristown, NJ**
on **March 25, 2008 at 3:23 PM**

Manner of Service: **SERVED: Matthew Stichoner, Authorized agent**
Description:

Sex: **Male** Skin: **White** Hair: **Brown** Eyes: **Brown** Age(Approx): **55** Height(Approx): **5' 11"** Weight(Approx): **225-250 lbs**
Other: **Glasses, Moustache**

I declare under penalty of perjury that the information contained herein is true and correct and this affidavit was executed on **March 25, 2008**.

State of New Jersey,
County of Essex
Subscribed and sworn to before me on March 25, 2008


David Spalding, Process Server

Express Process & Subpoena Company, Inc.
759 Bloomfield Avenue
PMB 323
West Caldwell, NJ 07006
Phone: (973) 364-1220

DOCUMENT# 23154


Sondra D. Rinsky
Notary Public

SONDRA D RINSKY
Notary Public
State of New Jersey
My Commission Expires November 14, 2010