

HAZLET TOWNSHIP BOARD OF EDUCATION

421 Middle Road, Hazlet, NJ 07730

GOVERNMENT RECORD REQUEST FORM

All persons requesting access to government records must fill out this form and either hand in or mail the form to the address listed above. All items must be printed or typed. The custodian of government records must review the request and requested documents before the requestor is permitted access to the document(s). If copies are requested, fees for documents to be copied must be prepaid. Checks must be made to the Hazlet Township Board of Education. Provided that a requested record is not in storage or archived, access must be granted or denied within 7 business days of the request. The requestor may appeal a denial of access in Superior Court or by filing a complaint with the Government Records Council of the New Jersey Department of Community Affairs.

Date of request:	03/26/2021
Name of person making request:	Anonymous Requestor
Address of person making request:	
Telephone number of requestor:	
Brief description of document(s) requested:	- Copy of Complaint Michael Vs RHS, - Copy of Answers - Copy of all Settlement Agreements and General Release S
Number of copies requested of document(s):	1 of each
Signature of the requestor:	(Email) - Received

FEE SCHEDULE

Letter size \$.05 per page ____ x \$.05 = ____

Legal size \$.07 per page ____ x \$.07 = ____

Postage

TOTAL

n/a

Note: No public record may be removed from the office in which it is maintained

FOR DISTRICT USE ONLY

Date request received: 3/26/2021

Name of record(s) made available: _____

Date record(s) made available: _____

Request for the following record(s), or portion thereof is denied: _____

Reason(s) for denial: _____

Printed name of Custodian of Government Records: Christopher J. Mullins, CPA

Signature of Custodian of Government Records: _____

Date: _____

PO BOX 968064
 SCHAUMBURG, IL 60196-8064
 (860) 257-6500



American Guarantee & Liability

Hazlet BOE
 421 Middle Rd
 Hazlet, NJ 07730

ATTENTION: Christopher J Mullins

DATE	05/26/20	SUBJECT	Notification of Closing of Claim
INSURED NAME	Hazlet BOE		
CLAIM NUMBER	ACCIDENT / LOSS		
964-0347878 D1	DATE 05/03/16	LOCATION Hazlet, NJ	CODE
POLICY NUMBER	PRODUCER NUMBER	DEPARTMENT NUMBER	
CPO 3701825 11	03 000 000		

Please be advised that the following claims, arising out of the captioned matter, have been closed.

Sincerely,

Dorraine Lucente
 Claim Professional
 PO BOX 968064
 SCHAUMBURG, IL 60196-8064
 (860) 257-6500

CLAIMANT NAME(S)

Michael Soviero
 PD TO DT AT CLOSING(INDEM)
 PD TO DT AT CLOSING(EXPN)

CLAIM NUMBER(S)

964-0347878-001

\$3000 CLOSING DATE: 05/21/20
 \$8882

James J. Law, Esquire - Attorney ID #: 023431991

DENGLER & LIPSKI

2000 Market Street, Suite 1100

Philadelphia, PA 19103

Direct Dial: (215) 861-6728

Fax: (215) 861-6737

Attorney for Defendant, Raritan High School and Hazlet Board of Education

File No. 464992

MICHAEL SOVIERO,
Plaintiff(s),

vs.

RARITAN HIGH SCHOOL; TOWNSHIP OF;
HAZLET BOARD OF EDUCATION;
KENNETH FRIEND; KURT FRIEND or
"JOHN DOE" FRIEND (Father of Kenneth
Friend – name fictitious/unknown at this time);
ANNETTE FRIEND OR "JANE DOE"
FRIEND (Mother of Kenneth Friend – name
fictitious/unknown at this time); ABC
CORP(S) 1-5 (names being fictitious/unknown
at this time) and JOHN DOES 1-5 (names
being fictitious/unknown at this time),
Defendant(s).

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION
: MONMOUTH COUNTY
:
: DOCKET NO. MON-L-990-19

CIVIL ACTION

**STIPULATION OF DISMISSAL
WITH PREJUDICE**

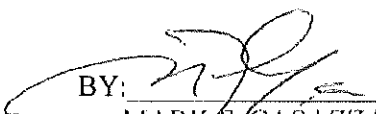
The matter in difference in the above entitled action, having been amicably adjusted by and between the parties, it is hereby stipulated and agreed that the same be and it is hereby dismissed without costs against either party, with prejudice.

Dated:

DENGLER & LIPSKI

BY: 
JAMES J. LAW
Attorney for Defendants,
Raritan High School and Hazlet
Board of Education

**RUDNICK, ADDONIZIO, PAPPA
& CASAZZA**

BY: 
MARK F. CASAZZA
Attorney for Plaintiff

RUDNICK, ADDONIZIO, PAPP & CASAZZA

A Professional Corporation

25 Village Court

Hazlet, New Jersey 07730

(732) 264-4400 File No. L-11249-CZ

Attorneys for Plaintiff

MFC: ATTORNEY ID NO. 042251998

MICHAEL SOVIERO,

Plaintiff,

vs.

**RARITAN HIGH SCHOOL, TOWNSHIP
OF HAZLET BOARD OF EDUCATION,
KENNETH FRIEND, KURT FRIEND OR
"JOHN DOE" FRIEND (FATHER OF
KENNETH FRIEND - NAME
FICTITIOUS/UNKNOWN AT THIS TIME),
ANNETTE FRIEND OR "JANE DOE"
FRIEND, (MOTHER OF KENNETH
FRIEND- NAME FICTITIOUS/UNKNOWN
AT THIS TIME), ABC CORP(S). 1-5
(NAMES BEING FICTITIOUS/UNKNOWN
AT THIS TIME) AND JOHN DOES 1-5
(NAMES BEING FICTITIOUS/UNKNOWN
AT THIS TIME),**

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY**

DOCKET NO.: MON-L-990-19

CIVIL ACTION

SUMMONS

***FROM THE STATE OF NEW JERSEY
TO THE DEFENDANT(S) NAMES ABOVE:***

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 receive 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, P.O. Box 971, Trenton, NJ 08625-0971. 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 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. 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.

s/Michelle M. Smith, Esq.

Clerk of Superior Court

DATED: March 19, 2019

Name and Address of Defendant(s) to be served:

- 1) Raritan High School
419 Middle Road
Hazlet, NJ 07730
Attn: Andrew R. Piotrowski, Principal
- 2) Hazlet Township Board of Education
421 Middle Road
Hazlet, NJ 07730
ATTN: ADMINISTRATOR
- 3) Kenneth Friend, 35 Bucknell Drive, Hazlet, NJ 07730
- 4) Kurt Friend, 35 Bucknell Drive, Hazlet, NJ 07730
- 5) Annette Friend, 35 Bucknell Drive, Hazlet, NJ 07730

MONMOUTH COUNTY
SUPERIOR COURT
PO BOX 1269
FREEHOLD

NJ 07728

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 677-4240
COURT HOURS 8:30 AM - 4:30 PM

DATE: MARCH 15, 2019
RE: SOVIERO MICHAEL VS RARITAN HIGH SCHOOL
DOCKET: MON L -000990 19

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 OWEN C. MCCARTHY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (732) 677-4262 EXT 4262.

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: MARK F. CASAZZA
RUDNICK ADDONIZIO, PAPPAS & CAS
25 VILLAGE COURT
HAZLET NJ 07730

ECOURTS

RUDNICK, ADDONIZIO, PAPP & CASAZZA

A Professional Corporation
25 Village Court
Hazlet, New Jersey 07730
(732) 264-4400 File No. L-11249-CZ
Attorneys for Plaintiff
MFC: ATTORNEY ID NO. 042251998

MICHAEL SOVIERO,

Plaintiff,

vs.

**RARITAN HIGH SCHOOL, TOWNSHIP
OF HAZLET BOARD OF EDUCATION,
KENNETH FRIEND, KURT FRIEND OR
"JOHN DOE" FRIEND (FATHER OF
KENNETH FRIEND - NAME
FICTITIOUS/UNKNOWN AT THIS TIME),
ANNETTE FRIEND OR "JANE DOE"
FRIEND, (MOTHER OF KENNETH
FRIEND- NAME FICTITIOUS/UNKNOWN
AT THIS TIME), ABC CORP(S). 1-5
(NAMES BEING FICTITIOUS/UNKNOWN
AT THIS TIME) AND JOHN DOES 1-5
(NAMES BEING FICTITIOUS/UNKNOWN
AT THIS TIME),**

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY**

DOCKET NO.

CIVIL ACTION

**COMPLAINT, DEMAND FOR INSURANCE
COVERAGE, DESIGNATION OF TRIAL
COUNSEL, JURY DEMAND AND
DEMAND FOR ANSWERS TO
INTERROGATORIES**

Plaintiff, MICHAEL SOVIERO, presently residing in the Township of Hazlet, County of Monmouth and State of New Jersey, by way of Complaint, against the defendants, says:

INTRODUCTION

1. This action arises from the outrageous conduct of the Raritan High School, Township Of Hazlet Board Of Education, Kenneth Friend, Kurt Friend Or "John Doe" Friend (Father Of Kenneth Friend - Name Fictitious/Unknown At This Time), Annette Friend Or "Jane Doe" Friend, (Mother Of Kenneth Friend- Name Fictitious/Unknown At This Time), ABC Corp(s). 1-5 and John Does 1-5 (names being fictitious/unknown at this time) located in the

RUDNICK, ADDONIZIO, PAPP & CASAZZA
A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW
PARK VILLAGE
25 VILLAGE COURT
HAZLET, NEW JERSEY 07730

Township of Hazlet and County of Monmouth hereinafter (collectively "Defendants") in purposely failing to take action to remedy harassment and bullying of Plaintiff after Defendant, Kenneth Friend videoed Plaintiff going to the bathroom while in the school bathroom, thereby causing Plaintiff permanent and severe emotional distress, including post-traumatic stress.

2. On or about May 3, 2016, Plaintiff was a student attending school at Raritan High School in the Township of Hazlet, County of Monmouth and State of New Jersey. During school, Defendant, Kenneth Friend invaded the privacy of, harassed, bullied and intimidated Plaintiff by filming Plaintiff while he defecated in a locked bathroom stall.

3. Plaintiff has since suffered severe ridicule and verbal abuse on account of the sensitive and embarrassing content of the video, together with the dissemination of said video, causing Plaintiff extreme and lasting emotional distress.

PARTIES

4. Plaintiff, Michael Soviero is a domiciliary of the State of New Jersey and resides in the Township of Hazlet and County of Monmouth. At the time of the occurrence of this cause of action herein, Plaintiff was under the age of eighteen years old, specifically seventeen years old.

5. Defendant Township of Hazlet Board of Education is a board of education existing and organized under the laws of the State of New Jersey and located in the Township of Hazlet, New Jersey.

6. Defendant, Raritan High School is a public high school existing and organized under the laws of the State of New Jersey, located in the Township of Hazlet, New Jersey, and a part of the Hazlet Public School District. At all times relevant herein, Plaintiff was a student at Raritan High School.

7. Upon information and belief, Defendant, Kenneth Friend was a fellow student of the Plaintiff at Raritan High School and was also under the age of eighteen at all relevant times herein.

8. Upon information and belief, Defendant, Kurt Friend Or "John Doe" Friend (Father Of Kenneth Friend – Name Fictitious/Unknown At This Time), Annette Friend Or "Jane Doe" Friend (Mother Of Kenneth Friend- Name Fictitious/Unknown At This Time) are the parents of Defendant, Kenneth Friend.

9. At all times relevant herein, listed Defendants ABC Corp(s). 1-5 (names being fictitious/unknown at this time) and Defendants John Does 1-5 (names being fictitious/unknown at this time) are unidentified individuals and/or companies that may be liable for the causes of action set forth herein.

NOTICE OF CLAIM PROCEEDINGS

10. Pursuant to N.J.S.A. §59:8-1 *et. seq.*, on or about March 15, 2017, and within the time prescribed by law, minor Plaintiff served and filed a Notice of Tort Claim upon Defendant, Raritan High School and Defendant, Township Of Hazlet Board Of Education. Thereafter, Defendants refused or neglected for more than six months, and up to the commencement of this action, to make any adjustment or payment thereof, and thereafter and within the time provided by law, this action was commenced.

BACKGROUND INFORMATION

11. On May 3, 2016 at about 8:00 a.m., Plaintiff was in the bathroom at Raritan High School during normal school hours.

12. While Plaintiff was using a bathroom at Raritan High School, Defendant, Kenneth Friend took stills and/or video over the top of the locked bathroom stall in which Plaintiff was defecating.

13. Upon information and belief, one of the students who were shown this video, reported Defendant's conduct to the principal's office.

14. Defendant, Raritan High School has a policy prohibiting students from possessing their cellular phones and other related electronic devices while in school during school hours, and also prohibits the same from being possessed and/or used in the bathrooms at Raritan High School at anytime.

15. Plaintiff was subjected to ridicule, bullying, harassment and intimidation by the students of Raritan High School.

16. On May 3, 2016, Plaintiff's parents received a call from the Raritan High School principal informing them that another student had videoed Plaintiff using the restroom.

17. Upon information and belief, Defendant, Kenneth Friend was charged with being delinquent of criminal offenses as a result of his invasion of Plaintiff's privacy by surreptitiously videoing him in the bathroom at Raritan High School.

18. Upon information and belief, Defendant, Kenneth Friend was adjudicated delinquent by way of his guilty plea to one or more criminal charges.

19. By failing to take timely and appropriate action to supervise and/or monitor cell phone use, enforce their own policy or otherwise prevent the bullying harassment and intimidation of Plaintiff, Defendants have breached their duty to protect Plaintiff.

20. By failing to properly supervise their son, Defendant, Kenneth Friend or otherwise prevent the bullying harassment and intimidation of Plaintiff, Defendant, Kurt Friend Or "John

Doe" Friend (Father Of Kenneth Friend – Name Fictitious/Unknown At This Time), Annette Friend Or "Jane Doe" Friend (Mother Of Kenneth Friend- Name Fictitious/Unknown At This Time) have breached their duty to protect Plaintiff.

21. As a direct and proximate cause of the failure of Defendants to properly address the bullying, harassment, and intimidation, Plaintiff has suffered severe and permanent emotional distress from the video published on the Internet, including social networking websites, and the resulting ridicule by students of Raritan High School.

22. Plaintiff is currently suffering emotional upset directly and proximately caused by Defendants' failure to take timely action regarding the bullying, harassment, and intimidation by Defendant, Kenneth Friend and/or other students of Raritan High School.

COUNT ONE: NEGLIGENT SUPERVISION AGAINST
RARITAN HIGH SCHOOL, TOWNSHIP OF HAZLET BOARD OF EDUCATION
DEFENDANTS ABC CORP(S) 1-5 (NAMES BEING FICTITIOUS/UNKNOWN AT THIS
TIME) AND DEFENDANTS JOHN DOES 1-5 (NAMES BEING FICTITIOUS/UNKNOWN AT
THIS TIME)

23. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 22, inclusive, of this Complaint, as though set forth in full herein.

24. Defendants' negligence, gross negligence, reckless conduct and lack of supervision of students directly and proximately caused Plaintiff to be illegally videoed by a fellow student, ridiculed, harassed, bullied and intimidated on account of aforementioned video being taken and shown to fellow students.

25. Defendants' lack of supervision directly and proximately caused Plaintiff to suffer severe emotional damages.

26. For the foregoing reasons, Plaintiff is entitled to monetary damages.
WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that

Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3) require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

COUNT TWO: NEGLIGENT SUPERVISION OF A MINOR CHILD AGAINST
DEFENDANT, KURT FRIEND OR "JOHN DOE" FRIEND (FATHER OF KENNETH FRIEND
-NAME FICTITIOUS/UNKNOWN AT THIS TIME),
ANNETTE FRIEND OR "JANE DOE" FRIEND (MOTHER OF KENNETH FRIEND- NAME
FICTITIOUS/UNKNOWN AT THIS TIME), DEFENDANTS ABC CORP(S) 1-5 (NAMES
BEING FICTITIOUS/UNKNOWN AT THIS TIME) AND DEFENDANTS JOHN DOES 1-5
(NAMES BEING FICTITIOUS/UNKNOWN AT THIS TIME)

27. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 26, inclusive, of this Complaint, as though set forth in full herein.

28. Defendants' negligence, gross negligence, reckless conduct and lack of supervision of Defendant, Kenneth Friend directly and proximately caused Plaintiff to be ridiculed, harassed, bullied and intimidated on account of aforementioned video being taken and shown to fellow students.

29. Defendants' negligent supervision directly and proximately caused Plaintiff to suffer severe emotional damages.

30. For the foregoing reasons, Plaintiff is entitled to monetary damages. WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3) require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus

interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

COUNT THREE: NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS

31. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 30, inclusive, of this Complaint, as though set forth in full herein.

32. Defendants' negligence, gross negligence and recklessness as set forth herein has caused Plaintiff severe and lasting emotional distress.

33. Plaintiff is suffering from emotional distress on account of the invasion of privacy, ridicule, harassment, bullying and intimidation he endured on a daily basis as a result of the video being taken and shown to others.

34. For the foregoing reasons, Plaintiff is entitled to monetary damages. WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3) require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

COUNT FOUR: VIOLATION OF THE NEW JERSEY ANTI-BULLYING STATUTE

35. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 34, inclusive, of this Complaint, as though set forth in full herein.

36. Plaintiff is entitled to protection under the New Jersey Anti-Bullying Statute.

37. Based on the foregoing reckless inaction on the part of Defendant, Raritan High School, Defendant, Township of Hazlet Board of Education, Defendants ABC Corp(s). 1-5

(names being fictitious/unknown at this time) and Defendants, John Does 1-5 (names being fictitious/unknown at this time) and the willful and wanton actions of Defendant, Kenneth Friend, the New Jersey Anti-Bullying Statute was violated and such violation proximately caused the harm occasioned by Plaintiff.

38. Defendant, Kurt Friend Or "John Doe" Friend (Father Of Kenneth Friend - Name Fictitious/Unknown At This Time), Annette Friend Or "Jane Doe" Friend (Mother Of Kenneth Friend- Name Fictitious/Unknown At This Time) are also liable for the conduct of their minor child, Defendant Kenneth Friend, under the New Jersey Anti-Bullying Statute.

39. For the foregoing reasons, Plaintiff is entitled to economic, monetary damages. WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3) require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

COUNT FIVE: VIOLATION OF PLAINTIFF'S CIVIL RIGHTS
PURSUANT TO 42 U.S.C. § 1983

40. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 39, inclusive, of this Complaint, as though set forth in full herein.

41. Defendants deprived Plaintiff of his Fourteenth Amendment right (and such right under the New Jersey Constitution) to be free from emotional abuse by a public school employee. Such Defendants violated Plaintiff's rights by intentionally, recklessly, and willfully failing to perform a full investigation into the matter, take disciplinary actions against students, and supervise student conduct towards Plaintiff.

42. The conduct and omissions of Defendants were committed by persons acting under the color of state law in that they are public school employees.

43. Defendants had knowledge and acquiesced to such emotional abuse as was directed at Plaintiff and deliberately took no action to remedy the situation.

44. Such emotional abuse was arbitrary, capricious, or wholly unrelated to the legitimate state goal of maintaining an atmosphere conducive to learning.

45. Defendant, Township of Hazlet Board of Education violated Plaintiff's constitutional rights by acting pursuant to their official policy and custom.

46. Defendant, Township of Hazlet Board of Education had a custom or policy not to adequately train or supervise its employees with regard to the taking cell phone pictures or videos by students of the students.

47. Defendant, Township of Hazlet Board of Education is guilty of systematic failure to supervise and train its employees to such a degree that it amounts to a policy or custom of deliberate indifference to constitutional violations of a student, Plaintiff.

48. Defendants disregarded a known or obvious consequence of their actions.

49. For the foregoing reasons, Plaintiff is entitled to economic, monetary damages.

WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3) require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

COUNT SIX: VIOLATION OF PLAINTIFF'S CIVIL RIGHTS
PURSUANT TO N.J.S.A. §10:6-1

50. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 49, inclusive, of this Complaint, as though set forth in full herein.

51. Based upon the foregoing, Defendants violated New Jersey Civil Rights Act (NJCRA), N.J.S.A. §10:6-1, *et seq.*

52. The above-described willful and reckless misconduct, emotional abuse and omissions by Defendants proximately caused severe emotional distress heightened anxiety and fear to Plaintiff.

53. For the foregoing reasons, Plaintiff is entitled to economic, monetary damages. WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3) require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

COUNT SEVEN: INVASION OF PRIVACY

54. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 53, inclusive, of this Complaint, as though set forth in full herein.

55. The actions of Defendant, Kenneth Friend as aforesaid constitute an actionable invasion of privacy against Plaintiff.

56. Defendant, Kenneth Friend negligently and/or intentionally invaded the privacy of Plaintiff in a state of undress and using the bathroom while having a legitimate expectation of privacy at all relevant times herein.

57. As a result of Defendant, Kenneth Friend's wrongful actions proximately caused severe emotional distress evidenced by post-traumatic stress disorder, heightened anxiety and fear to Plaintiff.

58. For the foregoing reasons, Plaintiff is entitled to economic, monetary damages. WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3) require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

COUNT EIGHT: NEGLIGENCE AGAINST DEFENDANTS. RARITAN HIGH SCHOOL, TOWNSHIP OF HAZLET BOARD OF EDUCATION, DEFENDANTS ABC CORP(S). 1-5 (NAMES BEING FICTITIOUS/UNKNOWN AT THIS TIME) AND DEFENDANTS, JOHN DOES 1-5 (NAMES BEING FICTITIOUS/UNKNOWN AT THIS TIME)

59. Plaintiff repeats and incorporates herein each and every allegation contained in paragraphs 1 through 59, inclusive, of this Complaint, as though set forth in full herein.

60. Defendants' negligence, gross negligence, reckless conduct and lack of supervision in monitoring and/or enforcing its own policies as well as the students of Raritan High School, including Defendant, Kenneth Friend in possessing and/or utilizing cell phones in prohibited areas and during prohibited hours directly and proximately caused Plaintiff to suffer severe emotional damages.

61. For the foregoing reasons, Plaintiff is entitled to economic, monetary damages. WHEREFORE, Plaintiff demands Judgment against Defendants for the following: finding that Defendants' actions or inactions have violated the duty owed to Plaintiff, requiring that Defendants: (1) pay monetary damages to Plaintiff, (2) pay punitive damages to Plaintiff, (3)

require Defendants to reimburse Plaintiff for any and all attorney's fees and other costs, plus interest, related to filing this litigation; and (4) provide such other relief to Plaintiff as is deemed necessary and proper by this Court.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to *Rule 4:10-2(b)*, demand is made that Defendants disclose to Plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of the judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide Plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary insurance coverage, but also any excess, catastrophe, and umbrella policies.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of *Rule 4:25-4*, the Court is advised that MARK F. CASAZZA, ESQUIRE, is hereby designated as trial counsel.

JURY DEMAND

Plaintiff hereby demands a trial by a jury of six (6) jurors as to all issues raised by these pleadings.

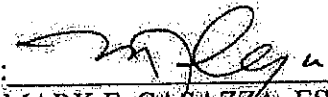
DEMAND FOR ANSWERS TO UNIFORM AND SUPPLEMENTAL INTERROGATORIES

PLEASE TAKE NOTICE that pursuant to *Rule 4:17-1(b)(ii)(2)*, Plaintiff hereby demands answers to Uniform Interrogatories Form C and Form C(2) within sixty (60) days of the filing of Defendants' Answer to this Complaint.

RUDNICK, ADDONIZIO, PAPP & CASAZZA
A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW
PARK VILLAGE
25 VILLAGE COURT
HAZLET, NEW JERSEY 07730

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 4:17-1(b)(i)(1) and Rule 4:17-2, Plaintiff hereby demands answers to the attached Supplemental Interrogatories within sixty (60) days of the filing of Defendants' Answer to this Complaint.

RUDNICK, ADDONIZIO, PAPP & CASAZZA
Attorneys for the Plaintiff

By: 
MARK F. CASAZZA, ESQUIRE

Dated: March 15, 2019

SUPPLEMENTAL INTERROGATORIES PERMITTED PURSUANT
TO RULE 4:17-1(b)(i)

- S1. State whether Defendant or anyone in Defendant's behalf has made or caused to be made any surveillance photographs, video tapes, movies or other recordings of the Plaintiff since the date of the accident, and if so, please state the date(s) upon which such surveillance photographs, video tapes, movies or other recordings were made, the name and address of the person taking or making such surveillance photographs, video tapes, movies or other recordings, what each surveillance photographs, video tapes, movies or other recordings depict. Pursuant to the Rules of Court, this interrogatory is deemed to be continuing and Plaintiff shall rely upon your answer to this interrogatory at the time of trial.
- S2. If you contend or will contend that the permanency of Plaintiff's injuries should not be evidential or be considered by the finder of fact, state with detail and with particularity and specificity each and every basis of fact or law upon which you will rely to support such contention.
- S3. State whether this Defendant occupied the premises where Plaintiff's incident occurred as of the date of Plaintiff's accident.
- S4. If this Defendant did not own or occupy the premises where Plaintiff's accident occurred as of the date of the Plaintiff's accident, please state the name and address of the person, firm and/or corporation who did own and/or occupy the premises where Plaintiff's accident occurred as of the date of Plaintiff's accident.

- S5. State whether this Defendant conducted any business on the premises where Plaintiff's accident occurred as of the date of Plaintiff's accident, and if so, set forth in detail and with particularity and specificity the nature of the business conducted.
- S6. State whether any inspections or tests made of the accident site by Defendant, or anyone in Defendant's behalf, subsequent to the accident alleged by Plaintiff, and if so, please state the date of said inspection or test, an exact description of such inspection or test, the name, address and job title of the person who performed such inspection or test and the results of said inspection or test.

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)

Pursuant to R. 1:38-7(c), 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).

CERTIFICATION

Pursuant to the requirements of Rule 4:5-1 (NOTICE OF OTHER ACTIONS), I, the undersigned, do hereby certify to the best of my knowledge, information and belief, that except as hereinafter indicated, the subject matter of the controversy referred to in the within pleading is not the subject of any other Cause of Action, pending in any other Court, or of a pending Arbitration Proceeding, nor is any other Cause of Action or Arbitration Proceeding contemplated;

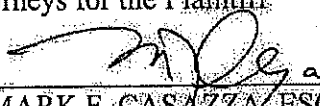
1. OTHER ACTIONS PENDING.....YES ___ NO X
 - A. If YES - Parties to other Pending Actions.
 - B. In my opinion, the following parties should be joined in the within pending Cause of Action.
2. OTHER ACTIONS CONTEMPLATED?.....YES ___ NO X
 - A. If YES - Parties contemplated to be joined, in other Causes of Action.
3. ARBITRATION PROCEEDINGS PENDING?.....YES ___ NO X
 - 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? YES ___ NO X

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

In the event that during the pendency of the within Cause of Action, I shall become aware of any change as to any facts stated herein, I shall file an amended certification and serve a copy thereof on all other parties (or their attorneys) who have appeared in said Cause of Action.

RUDNICK, ADDONIZIO, PAPPÀ & CASAZZA
Attorneys for the Plaintiff

By: 
MARK F. CASAZZA, ESQUIRE

Dated: March 15, 2019

Civil Case Information Statement

Case Details: MONMOUTH | Civil Part Docket# L-000990-19

Case Caption: SOVIERO MICHAEL VS RARITAN HIGH SCHOOL

Case Initiation Date: 03/15/2019

Attorney Name: MARK F CASAZZA

Firm Name: RUDNICK ADDONIZIO, PAPPAS & CASAZZA

Address: 25 VILLAGE COURT

HAZLET NJ 07730

Phone:

Name of Party: PLAINTIFF : Soviero, Michael

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

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? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? 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? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? 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)*

03/15/2019

Dated

/s/ MARK F CASAZZA

Signed