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Attorneys for Defendants, Toms River Regional Schools (i/p/a Toms River Regional School District), Heather DeGrandis, Christopher Madigan, Kevin Ralyman and Edward Keller
Our File No. 5876-116

STUDENT A,	SUPERIOR COURT OF NEW JERSEY
Plaintiff,	LAW DIVISION - OCEAN COUNTY
vs.	Civil Action
TOMS RIVER REGIONAL SCHOOL DISTRICT, MICHAEL ROMANO, HEATHER DEGRANDIS, CHRISTOPHER MADIGAN, KEVIN RALYMAN, and EDWARD KELLER,	DOCKET NO. OCN-L-001435-21
Defendants.	ANSWER TO COMPLAINT, AFFIRMATIVE DEFENSES AND JURY DEMAND

The Defendants, **TOMS RIVER REGIONAL SCHOOLS (i/p/a “Toms River Regional School District”)**(hereinafter, “TRRS”), **HEATHER DEGRANDIS, CHRISTOPHER MADIGAN, KEVIN RALYMAN and EDWARD KELLER (hereinafter, collectively referred to as “Defendants”)**, by way of Answer to the Plaintiff’s Complaint, say:

PARTIES

1. Denied.
2. Admitted only as to the address of Defendant, TRRS; Plaintiff is left to her proofs as to the remainder of the allegations which also state a conclusion of law to which no answer is required.
3. Admitted, only to the extent that Defendant, Michael Romano, was previously employed by TRRS; Plaintiff is left to her proofs as to the remainder of the allegations which also state a conclusion of law to which no answer is required.
4. Admitted, only to the extent that Defendant, Heather DeGrandis, is employed by

Defendant, TTRS; Plaintiff is left to her proofs as to the remainder of the allegations which also state a conclusion of law to which no answer is required.

5. Admitted, only to the extent that Defendant, Christopher Madigan, is employed by Defendant, TTRS; Plaintiff is left to her proofs as to the remainder of the allegations which also state a conclusion of law to which no answer is required.

6. Admitted, only to the extent that Defendant, Kevin Ralyman, is employed by Defendant, TTRS; Plaintiff is left to her proofs as to the remainder of the allegations which also state a conclusion of law to which no answer is required.

7. Admitted, only to the extent that Defendant, Edward Keller, is employed by Defendant, TTRS; Plaintiff is left to her proofs as to the remainder of the allegations which also state a conclusion of law to which no answer is required.

INTRODUCTION

8. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

9. Denied.

10. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

11. Denied.

12. Denied.

13. Denied.

14. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

15. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

16. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

17. The allegations contained in this paragraph state conclusions of law to which no

answer is required, but are otherwise denied by these Defendants.

18. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

19. Denied.

20. Denied.

FACTS COMMON TO ALL COUNTS

21. Admitted, only to the extent that Plaintiff attended school in the Toms River School District; Plaintiff is left to her proofs as to the remainder of the allegations which also state a conclusion of law to which no answer is required.

22. Admitted, only to the extent that Plaintiff attended school in the Toms River School District during the 2019-2020; Plaintiff is left to her proofs as to the remainder of the allegations

23. Denied.

24. Denied.

25. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

26. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

27. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

28. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

29. The Defendants deny the allegations insofar as they may be intended or purport to set

forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

30. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

31. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

32. Denied.

33. Denied.

34. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

35. Admitted, in part.

36. Admitted.

37. Admitted, in part, only to the extent that there was an accusation that Defendant Romano had been drinking during school hours.

38. Admitted, in part, only to the extent that, upon information and belief, Defendant Romano had been drinking during school hours.

39. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

40. Admitted, only to the extent that an investigation was performed; Plaintiff is left to her proofs as to the remainder of this allegation.

41. Admitted, only to the extent that an investigation was performed; Plaintiff is left to her proofs as to the remainder of this allegation.

42. The Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained herein.

43. The Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained herein.

44. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

45. Denied.

46. Denied.

COUNT I – TITLE IX – SEXUAL HARASSMENT-AGAINST TOMS RIVER

[42.]¹The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

43. The allegations contained in this paragraph state a conclusion of law as to which no answer is required.

44. The allegations contained in this paragraph state a conclusion of law as to which no answer is required, but are otherwise denied by these Defendants.

45. Denied.

46. Denied.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem

¹ The paragraphs starting in this Count of the Complaint are not labeled chronologically.

equitable and just.

**COUNT II – 42. U.S.C. §1983 – VIOLATION OF CIVIL RIGHTS-AGAINST
DEFENDANT ROMANO IN HIS INDIVIDUAL CAPACITY**

47. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

48. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

49. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

50. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

51. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

52. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

53. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

54. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing

therein that are not against them.

55. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

56. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

57. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

58. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

59. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

60. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

**COUNT III – 42 U.S.C. § 1873 – VIOLATION OF CIVIL RIGHTS-
AGAINST DEFENDANTS RALYMAN, DEGRANDIS, MADIGAN &
KELLER IN THEIR INDIVIDUAL CAPACITIES**

61. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

62. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

63. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

64. Denied.

65. Denied.

66. Denied.

67. Denied.

68. Denied.

69. Denied.

70. Denied.

71. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

72. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

73. Denied.

74. Denied.

75. Denied.

76. Denied.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

COUNT IV-42 U.S.C. § 1983 – VIOLATION OF CIVIL RIGHTS – AGAINST DEFENDANTS TOMS RIVER AND DEFENDANTS ROMANO, RALYMAN, DEGRANDIS, MADIGAN & KELLER IN THEIR OFFICIAL CAPACITIES

77. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

78. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

79. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

80. This allegation, as phrased, is incomplete but appears to state a conclusion of law to which no answer is required.

81. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

82. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

83. The allegations contained in this paragraph state conclusions of law to which no answer is required

84. Denied.

85. The allegations contained in this paragraph refers to an entity known as "Triton"

and/or refers to anyone other than the answering Defendants and, therefore, no answer is required but this paragraph is otherwise denied.

86. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

87. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

88. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

89. Denied.

90. Denied.

91. Denied.

92. Denied.

93. Denied.

94. Denied.

95. Denied.

96. Denied.

97. Denied.

98. Denied.

99. Denied.

100. Denied.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

COUNT V –NEW JERSEY CHILD SEX ABUSE ACT - AGAINST
DEFENDANT ROMANO

101. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

102. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

103. The Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

104. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

105. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

106. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

COUNT VI – BATTERY – AGAINST DEFENDANT ROMANO

107. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

108. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

109. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

110. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

111. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

112. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

113. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

**COUNT VII – NEW JERSEY SEXUAL ABUSE ACT – AGAINST DEFENDANTS
TOMS RIVER, RALYMAN, DEGRANDIS, MADIGAN & KELLER**

114. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

115. The Defendants deny the allegations insofar as they may be intended or purport to set forth a claim for relief against them, but they make no answer to the allegations appearing therein that are not against them.

116. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

117. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

118. Denied.

119. Denied.

120. Denied.

121. Denied.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

**COUNT VIII – NEGLIGENCE, NEGLIGENT HIRING, NEGLIGENT
SUPERVISION AND TRAINING, AND NEGLIGENT RETENTION-
AGAINST DEFENDANT TOMS RIVER**

122. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

123. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

124. Denied.

125. Denied.

126. Denied

127. Denied.

128. Denied.

129. Denied.

130. Denied.

131. Denied.

132. Denied.

133. Denied.

134. Denied.

135. Denied.

136. Denied.

137. Denied.

138. Denied.

139. Denied.

140. Denied.

141. Denied.

142. Denied.

143. Denied.

WHEREFORE, the Defendants demand judgment in their favor dismissing the

Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

**COUNT IX – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –
AGAINST DEFENDANT ROMANO**

144. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

145. The allegations contained in this paragraph refer to parties other than answering Defendants, and therefore, no answer is required.

146. The allegations contained in this paragraph refer to parties other than answering Defendants, and therefore, no answer is required.

147. The allegations contained in this paragraph refer to parties other than answering Defendants, and therefore, no answer is required.

148. The allegations contained in this paragraph refer to parties other than answering Defendants, and therefore, no answer is required.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

**COUNT X – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS-
AGAINST DEFENDANT TOMS RIVER AND DEFENDANTS ROMANO
RALYMAN, DEGRANDIS, MADIGAN & KELLER**

149. The Defendants repeat each and every answer to the allegations contained in the previous counts of this Complaint and make the same a part hereof as though fully set forth at length herein.

150. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

151. The allegations contained in this paragraph state conclusions of law to which no answer is required, but are otherwise denied by these Defendants.

152. Denied.

153. Denied.

154. Denied.

155. Denied.

WHEREFORE, the Defendants demand judgment in their favor dismissing the Complaint together with costs, attorney's fees and such other relief as the Court may deem equitable and just.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Plaintiff fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Defendants performed each and every duty allegedly owed to the Plaintiff and, at all times, were acted properly and pursuant to law.

THIRD AFFIRMATIVE DEFENSE

Plaintiff is barred from recovery because Plaintiff is unable to prove that the Defendants caused the Plaintiff any damage.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff has not been deprived of any right, privilege, or immunity created or recognized by the United States Constitution, the New Jersey Constitution, any statute, or any law.

FIFTH AFFIRMATIVE DEFENSE

If the Plaintiff suffered damages, such damages were caused by acts or omissions of other persons for whom these Defendants are not responsible or persons not under the control of these Defendants.

SIXTH AFFIRMATIVE DEFENSE

Defendants deny the existence of or breach of any duty and further deny the existence of or breach of any contractual obligation, expressed or implied. Defendants at all times relevant herein exercised the required degree of skill and reasonable care and diligence and exercised honesty, good faith, integrity and fidelity to the Plaintiffs.

SEVENTH AFFIRMATIVE DEFENSE

Defendants did not engage in any activity which proximately caused harm to Plaintiff. Any alleged error, omission or breach of duty on the part of the Defendants was not the cause-in-fact or a proximate cause of any alleged damage claimed by Plaintiff.

EIGHTH AFFIRMATIVE DEFENSE

Without conceding that Plaintiff has suffered any damages as a result of any wrongful act or omissions by Defendants, the Defendants plead that the Plaintiff is barred from recovery, in whole or part, for failure to mitigate its damages.

NINTH AFFIRMATIVE DEFENSE

Defendants did not take any adverse action against Plaintiff or otherwise retaliate against Plaintiff.

TENTH AFFIRMATIVE DEFENSE

Defendants took reasonable steps to prevent and promptly correct any sexual harassment alleged to have taken place.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff unreasonably failed to take advantage of Defendants' preventive or corrective measures.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiff failed to comply with the applicable Statute of Limitations of the laws of the State of New Jersey and, therefore, Defendants reserve the right to move to dismiss Plaintiffs' Complaint accordingly.

THIRTEENTH AFFIRMATIVE DEFENSE

Defendants did not engage in and are not responsible for any sexual harassment, discrimination, hostile work environment, statutory or civil rights violations, or any other unlawful practices, as alleged by Plaintiff.

FOURTEENTH AFFIRMATIVE DEFENSE

The conduct Plaintiff alleges to have occurred was not so severe or pervasive that reasonable persons in Plaintiff's position would find their school environment to be hostile or abusive.

FIFTEENTH AFFIRMATIVE DEFENSE

Defendants lacked actual or implied knowledge of the conduct as alleged in Plaintiff's Complaint.

SIXTEENTH AFFIRMATIVE DEFENSE

Defendants exercised reasonable care to prevent the sexual harassment alleged.

SEVENTEENTH AFFIRMATIVE DEFENSE

All of Plaintiff's claims are barred by the doctrines of waiver, estoppel and/or equitable estoppel, and release.

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiff is barred by the doctrines of laches.

NINETEENTH AFFIRMATIVE DEFENSE

Defendants are not guilty of malicious, willful or wanton conduct.

TWENTIETH AFFIRMATIVE DEFENSE

Defendants have the appropriate policies and procedures to address sexual harassment, discrimination and other unlawful claims. All employees are subject to these policies and procedures and training, equally, and without any distinction based on gender, sex, religion, or any other protected class. Defendants implemented an effective anti-harassment policy.

TWENTY-FIRST AFFIRMATIVE DEFENSE

Defendants properly and promptly investigated all of the claims alleged by Plaintiff and took immediate, effective remedial steps to resolve Plaintiff's complaints.

TWENTY-SECOND AFFIRMATIVE DEFENSE

Defendants did not engage in and are not responsible for any attempt to cause or purposely, knowingly, recklessly cause bodily injury to another by physical menace, or put another in fear of imminent serious bodily injury.

TWENTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's cause of action(s) is barred against the Defendants, in accordance with the New Jersey Tort Claims Act, N.J.S.A. 59:1-1 et seq.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

Defendants, at all times alleged in the Complaint, acted in a good faith belief that their actions were reasonable under the circumstances, did not violate Plaintiff's constitutional rights,

and therefore, Defendants and/or their agents and employees are entitled to absolute and/or qualified immunity.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

Defendants are not vicariously liable for the actions attributed to Defendants' employees because said employees are not supervisors and/or did not have a position of authority over Plaintiff.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

Defendants are not vicariously liable for the actions attributed to Defendants' employees because said employees were not acting within the scope of their employment.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

Defendants neither took nor sanctioned any of the actions alleged by Plaintiff.

TWENTY-EIGHTH AFFIRMATIVE DEFENSE

Plaintiff, by her own conduct, induced and negligently and/or intentionally caused and brought about the conduct of which she complains.

TWENTY-NINTH AFFIRMATIVE DEFENSE

Plaintiff's Complaint fails to state a claim for relief for punitive damages.

THIRTIETH AFFIRMATIVE DEFENSE

At all times complained of by Plaintiff, Defendants acted reasonably and without malice, negligence or recklessness as to Plaintiff.

THIRTY-FIRST AFFIRMATIVE DEFENSE

None of Defendants' agents and/or employees engaged in any interference, or attempts to interfere, by threats, intimidation, violence or coercion with Plaintiff's exercise or enjoyment of her constitutional rights.

THIRTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff failed to exhaust her administrative remedies.

THIRTY-THIRD AFFIRMATIVE DEFENSE

The complaint fails to state a federal civil rights claim under the doctrine announced in Monell v. Dep't of Soc. Servs., 436 U.S. 658 (1978).

THIRTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's harm is not the result of any policy or custom of Defendants.

THIRTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendants or to avoid harm complained of.

RESERVATION OF DEFENSES AND OBJECTIONS

Defendants hereby reserve the right to impose such other defenses and objections as continuing investigation and the course of discovery may reveal.

JURY DEMAND

Defendants hereby demand a trial by jury as to all issues in this matter.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Gary Ahladianakis, Esq. is designated as trial counsel on behalf of the Defendants **Toms River Regional Schools (i/p/a "Toms River Regional School District")**, **Heather DeGrandis, Christopher Madigan, Kevin Ralyman and Edward Keller** in this matter.

DEMAND FOR COMPLIANCE WITH RULES 1:51(a) and 4:17-4(c)

Undersigned counsel hereby demands, pursuant to Rules 1:5-1(a) and 4:17-4(c), that each party serving pleadings, Interrogatories, or responses thereto, shall serve copies of all such pleadings, Interrogatories or responses thereto on the undersigned counsel.

DEMAND FOR STATEMENT OF DAMAGES

Defendants hereby demand that Plaintiff provide Defendant with a Statement of Damages pursuant to Rule 4:5-2 within five (5) days after service of this request.

CERTIFICATION PURSUANT TO RULE 4:5-1

I hereby certify that to the best of my knowledge, the within matter is not the subject of any other action pending in any Court or the subject of a pending arbitration proceeding and no other action or arbitration proceeding is contemplated. Further, at this time, I know of no other parties who should be joined in this action.

CERTIFICATION PURSUANT TO R. 4:6-1

The undersigned hereby certifies that the within Answer and Affirmative Defenses are being served within the time allowed by the Rules of Court, as extended.

I HEREBY 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).

CARLUCCIO, LEONE, DIMON,
DOYLE & SACKS, L.L.C.
Attorneys for Defendants,
*Toms River Regional Schools (i/p/a "Toms River Regional
School District"), Heather DeGrandis, Christopher
Madigan, Kevin Ralyman and Edward Keller*


By: _____
GARY AHLADIANAKIS, ESQ.

Dated: August 20, 2021