

GOLD, ALBANESE, BARLETTI & LOCASCIO, LLC

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(732) 936-9901

Attorneys for Plaintiff, Jennifer Wetjen

JENNIFER WETJEN,

Plaintiff,

vs.

MATAWAN-ABERDEEN REGIONAL
SCHOOL DISTRICT BOARD OF
EDUCATION, JOSEPH G. MAJKA, BRIAN
WALSH, PATRICIA JANOVER, JOHN DOES
1-10 (said names being presently fictitious and
unknown individuals), and ABC Corps. 1-10
(said names being presently fictitious and
unknown entities),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY

DOCKET NUMBER: MON-L-

CIVIL ACTION:

**COMPLAINT, JURY DEMAND,
DESIGNATION OF TRIAL COUNSEL, FIRST
PLEADING CERTIFICATION AND CASE
INFORMATION STATEMENT**

Plaintiff, Jennifer Wetjen, residing at 1 Hemingway Drive, in the township of Hazlet, County of Monmouth, and the State of New Jersey, by way of Complaint against Defendants Matawan-Aberdeen Regional School District Board of Education, Joseph G. Majka, Brian Walsh, Patricia Janover, John Does 1-10 and ABC Corps. 1-10 says:

THE PARTIES

1. Plaintiff, Jennifer Wetjen ("Wetjen"), at all relevant times is a resident of Monmouth County, New Jersey, and a former employee of Defendant Matawan-Aberdeen Regional School District Board of Education.

2. Defendant, Matawan-Aberdeen Regional School District Board of Education ("Matawan-Aberdeen BOE"), at all times relevant, is a New Jersey public school district, with grades Kindergarten through 12th grade, is a place and employer of public accommodation, located at One Crest Way, Aberdeen, New Jersey 07747.

3. Defendant, Joseph G. Majka ("Majka"), at all times relevant and upon information and belief, is the superintendent for Matawan-Aberdeen BOE.

4. Defendant, Brian Walsh ("Walsh"), at all times relevant and upon information and belief, was the former Director of Personnel for the Matawan-Aberdeen BOE.

5. Defendant, Patricia Janover ("Janover"), at all times relevant and upon information and belief, is the principal of the Ravine Drive Elementary School for the Matawan-Aberdeen BOE.

6. Defendants, John Does 1-10, at all times relevant and upon information and belief, reside and work in New Jersey and are/were agents, employees, representatives, and/or volunteers for the Matawan-Aberdeen BOE.

7. Defendants, ABC Corp. 1-10, at all times relevant and upon information and belief, are domiciled in New Jersey and are/were agents, employees, representatives, contractors and/or volunteers for the Matawan-Aberdeen BOE.

FACTS COMMON TO ALL COUNTS

8. Wetjen was a 3rd grade teacher at the Ravine Drive Elementary School of the Matawan-Aberdeen BOE from September 1, 2015, until she was unlawfully terminated on February 27, 2017.

9. During Wetjen's tenure at Ravine Drive Elementary School she grew and developed as a new teacher and received exemplary classroom evaluations, including from her immediate supervisor Janover.

10. Then, in December 2015, Wetjen was diagnosed with anxiety and depression by her medical doctor.

11. This diagnosis provides protection for Wetjen pursuant to the New Jersey Law Against Discrimination, *N.J.S.A.* 10:5-1, et seq.

12. Wetjen then informed Janover of her diagnosis of both anxiety and depression.

13. After Wetjen informed Janover of Wetjen's diagnosis of anxiety and depression, Janover began to make unwarranted, inappropriate, humiliating and hostile comments to Wetjen and other faculty within the Matawan-Aberdeen BOE about Wetjen's anxiety.

14. Janover, while knowing Wetjen suffered from anxiety, would often humiliate Wetjen by making fun of Wetjen's stutter, telling Wetjen she spoke to fast in front of parents and other teachers, and cutting Wetjen off when Wetjen was speaking in meetings and not letting Wetjen finish her point.

15. During a meeting with Wetjen, Janover and other faculty, Janover told every faculty member in the group that Wetjen would make a terrible witness should a parent ever take the school to court for a 504 hearing because of Wetjen's stutter and quick speech and that Janover would need to coach Wetjen from the audience the entire time.

16. Janover even discussed Wetjen's anxiety diagnosis with other faculty members at Ravine Drive Elementary School without Wetjen present and for the sole purpose of humiliating Wetjen.

17. All of Janover's above referenced actions humiliated Wetjen and made exacerbated Wetjen's anxiety.

18. Janover further exacerbated Wetjen's anxiety by constantly saying rude comments to Wetjen, not treating Wetjen in a professional manner, making Wetjen, but no other teacher, submit documents prior to the actual due date, purposely causing scheduling problems for Wetjen throughout the

school day, observing Wetjen on non-scheduled observation days and openly favoring other teachers over Wetjen.

19. Wetjen complained about Janover's conduct to other teachers and union representatives though no action was taken as Wetjen was a non-tenured employee.

20. Then, in September 2016, Wetjen began to develop excruciating migraine headaches due to the high temperatures in Wetjen's classroom. During the week of September 9, 2016, Wetjen's classroom temperature reached 90 degrees.

21. Thereafter, Wetjen saw her neurologist regarding her migraines, prompting Wetjen's neurologist to write a note for an accommodation to get an air conditioner in Wetjen's classroom.

22. Wetjen then spoke with Janover regarding the accommodation for an air conditioner. During the meeting Janover was dismissive of the request, but stated she would speak to the central office to see what could be done.

23. Despite having a note from Wetjen's neurologist prescribing an air conditioner, Matawan-Aberdeen BOE requested permission to speak with Wetjen's neurologist regarding the air conditioner accommodation, which Wetjen promptly supplied.

24. Then, on September 22, 2017, Wetjen received her first observation of the 2016-17 school year from Dr. Karen Jones, assistant superintendent for the Matawan-Aberdeen BOE.

25. Dr. Jones' observation was unannounced, occurred right after class pictures, when the room was at 80 degrees and Wetjen still had not received her air conditioner accommodation and the subject matter was for a course improperly scheduled.

26. Wetjen was the first non-tenured teacher to be observed at Ravine Drive Elementary School for the 2016-2017 school year.

27. Additionally, Dr. Jones observed a lesson in Reader's Workshop, which had been improperly scheduled into Wetjen's teaching day. Indeed, the proper schedule should have been for Wetjen to teach Reader's Workshop followed by Guided Reading. However, Wetjen's schedule, which was created by Janover, had Wetjen teach Guided Reading in the morning with Reader's Workshop in the afternoon.

28. This improper scheduled caused Wetjen's anxiety to exacerbate as Wetjen feared she would be observed during either reading period with an incorrect schedule.

29. A few weeks after Wetjen's observation, Wetjen met with Dr. Jones and Wetjen's union representative to review Dr. Jones' observation.

30. The observation meeting was rescheduled multiple times by Dr. Jones and actually occurred a few days earlier than originally scheduled. Due to the earlier schedule at the behest of Dr. Jones, Wetjen was not able to complete her post-observation questions.

31. During the observation Wetjen and her union representative went point by point over Dr. Jones' observation and questioning certain unfair comments made by Dr. Jones. At the end of the post-observation meeting Dr. Jones made improper and intimidating comments to Wetjen, which left Wetjen feeling intimidated and anxious. Additionally, Dr. Jones never corrected her observation to include Wetjen's addendum to the observation, which Dr. Jones had previously agreed to allow Wetjen to include and submit as part of the observation.

32. Then, on or about October 11, 2016, Wetjen met with Walsh to discuss the reason for the Matawan-Aberdeen BOE not providing the air conditioner accommodation to Wetjen. Wetjen informed Walsh that she had the right to receive the air conditioner by law. Also, during this meeting Walsh told Wetjen he had communicated with Janover multiple times about the accommodation, yet a decision still

had not been made. Wetjen further voiced concern to Walsh regarding Janover's harassing treatment towards Wetjen for over the past year and the observation from Dr. Jones. Walsh stated he would look into all of these matters.

33. Finally, on October 17, 2016, Matawan-Aberdeen BOE installed an air conditioner in Wetjen's classroom.

34. Thereafter, on or about November 1, 2016, Wetjen had a follow-up meeting with Walsh to discuss Janover's harassment and intimidation towards Wetjen and Dr. Jones' observation.

35. During this meeting Walsh stated he spoke to Janover, who denied all allegations, and it appeared to Wetjen that Walsh, nor anyone else at Matawan-Aberdeen BOE, would reprimand Janover for her treatment of Wetjen.

36. Then, on January 11, 2017, while Wetjen was dismissing students who walked home out of the back door of her classroom, an irate parent of a male student in Wetjen's classroom stormed up to a female student exiting Wetjen's classroom yelling and screaming at the female student. Wetjen immediately shielded the female student from the irate parent by placing her body between the parent and the female student. The parent continued to make terroristic threats to Wetjen by threatening the safety of the female student, Wetjen and the entire school population.

37. This incident left the female student, as well as Wetjen, visibly upset.

38. Wetjen then spoke with the mother of the female student to alert her as to what had transpired and that Wetjen would be reporting the incident to Janover as well as interviewing all students involved.

39. Wetjen then spoke with Janover about the incident, detailing the threats made by the male student's mother and how threatened Wetjen felt by the incident. Janover simply told Wetjen to keep her updated on the situation.

40. It is upon information and belief Janover did not report this incident to the superintendent, the Matawan-Aberdeen BOE or local law enforcement in violation of Matawan-Aberdeen BOE policy and regulation 8420, Emergency and Crisis Situation; policy and regulation 8461, Reporting Violence, Vandalism, Alcohol and Other Drug Abuse; and policy and regulation 8468, Crisis Response.

41. On the very next day, January 12, 2017, Wetjen interviewed the male student and female student who were involved in the prior day's incident. After interviewing these students Wetjen attempted to meet with Janover on multiple occasions to apprise Janover of the situation, however, Janover did not respond to Wetjen's requests to meet and further discuss the incident.

42. Later that afternoon at dismissal time on January 12, 2017, Wetjen again met with the female student's mother to apprise her of the situation and what Wetjen believed was the cause of the prior day's incident. As the female student and her mother proceeded to walk to the parking lot the mother of the male student again accosted the female student and her mother and again began screaming terroristic threats at the mother and female student.

43. Both parents then began to walk towards Wetjen and her students, causing Wetjen to place her remaining students in the classroom and Wetjen then shielded her students by standing at the doorway to her classroom. The mother for the male student again started to use profanity and threatened Wetjen before retrieving her son and exiting the building. Two students who were still in Wetjen's classroom hid in the closet as they were afraid of the male student's mother.

44. Janover then came out of her office and proceeded to Wetjen's classroom. Janover, upon arriving at Wetjen's classroom, asked Wetjen if she had determined the cause of these incidents and Wetjen explained to Janover it was over a prior situation between yogurt being spilled between the male student and the female student. Janover then reprimanded Wetjen for not telling Janover this information earlier in the day, despite the fact Wetjen did attempt to relay this information onto Janover multiple times on January 12, 2017.

45. Janover then attempted to speak to the female student's mother about the yogurt incident instead of the multiple terroristic threats made by the male student's mother.

46. Wetjen's anxiety continued to escalate as a result of the terroristic threats.

47. On the next day, January 13, 2017, Wetjen, upon arriving at school, spoke with Janover in the office. Janover told Wetjen that Janover had met with the police department earlier that morning and would be meeting with the head of school security later that day. Wetjen asked Janover if a police officer would be assigned to Wetjen's classroom at dismissal as Wetjen feared for her safety and the safety of her student. Janover responded that a police officer would not be assigned to Wetjen's classroom, but instead would be located outside the school at dismissal.

48. Later that day on January 13, 2017, Janover advised Wetjen that a new dismissal procedure would be put into place for how Wetjen would dismiss her students, including the female student.

49. At dismissal, Wetjen observed a police officer, Janover and the head of security for the school all standing next to another teacher at Ravine Drive Elementary School. Earlier that morning this same teacher had told Wetjen she feared for her safety and now had a police presence next to her at the time of dismissal.

50. Then, on January 17, 2017, Wetjen met with Janover and Lieutenant Falco, of the Matawan Police Department, met with Wetjen to see how she was feeling. During this meeting Wetjen stated she still felt scared and was anxious because of the multiple threats.

51. Lieutenant Falco then asked Wetjen if there had been threats as he was unaware of same and Wetjen proceeded to tell Lieutenant Falco about the threats the male student's mother made on January 11, 2017. Lieutenant Falco was unaware of these threats prior to speaking with Wetjen.

52. Janover appeared visibly angry when Wetjen told Lieutenant Falco about the threats from January 11, 2017.

53. On January 18, 2017, Wetjen took a sick day from work because she was physically ill from what had transpired over the course of the past week at school.

54. Then, on January 19, 2017, Wetjen spoke with Barbara Lyttle ("Lyttle"), Wetjen's union representative, to tell Lyttle that she believed Janover failed to report the terroristic threats made on January 11, 2017, to the proper authorities as outlined in the Matawan-Aberdeen BOE's policies and regulations.

55. Then, on January 20, 2017, Wetjen met with Lyttle, two police officers from Matawan and the director of security for the school, wherein Wetjen advised of everyone in attendance at the meeting of what had transpired on January 11, 2017, and again on January 12, 2017, and how Wetjen believed Janover did not respond to these situations in a legal manner and in accordance with the appropriate Matawan-Aberdeen BOE policies and regulations.

56. Thereafter, on January 22, 2017, Wetjen received an email from Walsh requesting a meeting to take place on January 23, 2017, to discuss the recent events that had taken place at the school.

57. Then, on the morning of January 23, 2017, Wetjen met with Janover, Walsh and the director of security. During this meeting Wetjen was told it was the Matawan-Aberdeen BOE's opinion that Wetjen was too emotional over the incidents taking place on January 11, 2017 and January 12, 2017, and Wetjen should have reacted better to those situations. Walsh stated to Wetjen that he believed Wetjen's students were not safe in her classroom with Wetjen as the teacher. Walsh also stated the Matawan-Aberdeen BOE wanted Wetjen to be seen by a medical professional to see if she was fit to be a teacher.

58. Thereafter, the Matawan-Aberdeen BOE, through Majka, terminated Wetjen's employment on February 27, 2017.

COUNT ONE

(Violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, et seq – Hostile Work Environment – as to all defendants)

59. Wetjen repeats each and every allegation set forth above as if fully set forth herein at length.

60. Wetjen was employed by the Matawan-Aberdeen BOE from September 2015 to February 27, 2017.

61. In December 2015, Wetjen was diagnosed with anxiety and depression by her medical doctor.

62. Accordingly, Wetjen is a protected class pursuant to the New Jersey Law Against Discrimination, *N.J.S.A.* 10:5-1, et seq.

63. From the time Wetjen was diagnosed with anxiety and depression she was subjected to repeated, pervasive, severe and continuing instances of discrimination by the Matawan-Aberdeen BOE, Majka, Walsh and Janover.

64. The pattern of discrimination and harassment directed at Wetjen, includes, but is not limited to: (a) Janover humiliating Wetjen by making fun of Wetjen's stutter, telling Wetjen she spoke to fast in front of parents and other teachers, and cutting Wetjen off when Wetjen was speaking in meetings and not letting Wetjen finish her point; (b) Janover discussing Wetjen's anxiety diagnosis with other faculty members at Ravine Drive Elementary School without Wetjen present and for the sole purpose of humiliating Wetjen; (c) Janover constantly saying rude comments to Wetjen, not treating Wetjen in a professional manner, making Wetjen, but no other teacher, submit documents prior to the actual due date, purposely causing scheduling problems for Wetjen throughout the school day, observing Wetjen on non-scheduled observation days and openly favoring other teachers over Wetjen; (d) having a senior member of the central office give a less than favorable observation to Wetjen and then intimidating Wetjen when she tried to correct the facts contained in the observation; (e) failing to accommodate Wetjen with an air conditioner for her classroom in a timely manner; (f) Walsh failing to address Wetjen's complaints regarding Janover's discriminatory treatment and (g) embarrassing and humiliating Wetjen by criticizing Wetjen for the way she handled the terroristic threats made on January 11, 2017 and January 12, 2017.

65. The harassing conduct described herein occurred openly in the workplace. Instead of taking action to protect Wetjen, Defendants subjected Wetjen to prolonged harassment.

66. In addition, Wetjen complained of the harassment to both Janover and Walsh on multiple occasions, yet both individuals failed to take any action to address these harassing situations.

67. Walsh and Janover responded to Wetjen's complaints by dismissing and mischaracterizing Wetjen's complaints, failing to address some complaints and altogether ignoring other complaints. Walsh and Janover also retaliated against Wetjen by blaming her for the way Wetjen handled the terroristic threats being made on January 11, 2017 and again on January 12, 2017.

68. The harassing conduct would not have occurred, but for Wetjen's anxiety and depression.

69. The harassing conduct was so severe or pervasive enough to make a reasonable person and employee believe the conditions of employment were altered and the working environment was hostile and discriminatory.

70. As employers/supervisors of Wetjen, the Matawan-Aberdeen BOE is vicariously, strictly and directly liable to Wetjen pursuant to the New Jersey Law Against Discrimination, *N.J.S.A. 10:5-1, et seq.*, in that the affirmative acts of harassment and discrimination committed by Janover, Walsh and Majka, occurred within the scope of their employment; and/or the creation of the hostile work environment was aided by the Matawan-Aberdeen BOE in delegation power to Janover, Walsh and Majka to control the day-to-day working environment; and/or the Matawan-Aberdeen BOE was deliberately indifferent, reckless, negligent and/or tacitly approved the hostile work environment; and/or the Matawan-Aberdeen BOE failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training and/or monitoring mechanisms for same despite the foreseeability of harassment and discrimination in the workplace; and/or by having actual knowledge of the harassment of Wetjen and failing to promptly and effectively act to stop it.

71. As a proximate result of the aforementioned acts and omissions set forth herein, Wetjen has sustained emotional and pecuniary damages.

WHEREFORE, Wetjen demands judgment in her favor and against Defendants the Matawan-Aberdeen BOE, Majka, Walsh and Janover on this Count, together with compensatory and equitable relief, all remedies available under the New Jersey Law Against Discrimination, punitive damages, compensation for lost wages, lost benefits, including health and pension benefits, front pay, pre and post-

judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT TWO

**(Violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, et seq –
Retaliation/Improper Reprisal – as to all defendants)**

72. Wetjen repeats each and every allegation set forth above as if fully set forth herein at length.

73. As set forth above, Wetjen complained, threatened to complain, and/or protested against the continuing course of harassing and discriminatory conduct giving rise to the hostile work environment set forth at length above. The Matawan-Aberdeen BOE, Majka, Walsh, and Janover had knowledge about Wetjen's complaints and/or protests.

74. As a direct result of Wetjen raising complaints to these individuals and/or entities, the Matawan-Aberdeen BOE, Majka, Walsh, and Janover took retaliatory action against Wetjen.

75. As a proximate result of the aforementioned acts and omissions set forth herein, Wetjen has sustained emotional and pecuniary damages.

WHEREFORE, Wetjen demands judgment in her favor and against Defendants the Matawan-Aberdeen BOE, Majka, Walsh and Janover on this Count, together with compensatory and equitable relief, all remedies available under the New Jersey Law Against Discrimination, punitive damages, compensation for lost wages, lost benefits, including health and pension benefits, front pay, pre and post-judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT THREE

(Violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, et seq – Unlawful Discrimination and Termination – as to all defendants)

76. Wetjen repeats each and every allegation set forth above as if fully set forth herein at length.

77. In December 2015, Wetjen was diagnosed with anxiety and depression by her medical doctor.

78. Accordingly, Wetjen is a protected class pursuant to the New Jersey Law Against Discrimination, *N.J.S.A.* 10:5-1, et seq.

79. Wetjen, prior to being terminated by the Matawan-Aberdeen BOE, was performing her job at a level that met her employer's legitimate expectations.

80. Despite Wetjen performing her job at a level that met her employer's legitimate expectations, the Matawan-Aberdeen BOE, Majka, Walsh and Janover continually discriminated against her based upon anxiety diagnosis, including but not limited to: (a) Janover humiliating Wetjen by making fun of Wetjen's stutter, telling Wetjen she spoke to fast in front of parents and other teachers, and cutting Wetjen off when Wetjen was speaking in meetings and not letting Wetjen finish her point; (b) Janover discussing Wetjen's anxiety diagnosis with other faculty members at Ravine Drive Elementary School without Wetjen present and for the sole purpose of humiliating Wetjen; (c) Janover constantly saying rude comments to Wetjen, not treating Wetjen in a professional manner, making Wetjen, but no other teacher, submit documents prior to the actual due date, purposely causing scheduling problems for Wetjen throughout the school day, observing Wetjen on non-scheduled observation days and openly favoring other teachers over Wetjen; (d) having a senior member of the central office give a less than favorable observation to Wetjen and then intimidating Wetjen when she tried to correct the facts contained in the

observation; (e) failing to accommodate Wetjen with an air conditioner for her classroom in a timely manner; (f) Walsh failing to address Wetjen's complaints regarding Janover's discriminatory treatment and (g) embarrassing and humiliating Wetjen by criticizing Wetjen for the way she handled the terroristic threats made on January 11, 2017 and January 12, 2017.

81. The Matawan-Aberdeen BOE ultimately terminated Wetjen for suffering from anxiety as the Matawan-Aberdeen BOE, including Walsh and Janover, stated Wetjen became too emotional in handling the terroristic threats made on January 11, 2017 and January 12, 2017 and that Wetjen was not capable of properly protecting her students.

82. As a proximate result of the aforementioned acts and omissions set forth herein, Wetjen has sustained emotional and pecuniary damages.

WHEREFORE, Wetjen demands judgment in her favor and against Defendants the Matawan-Aberdeen BOE, Majka, Walsh and Janover on this Count, together with compensatory and equitable relief, all remedies available under the New Jersey Law Against Discrimination, punitive damages, compensation for lost wages, lost benefits, including health and pension benefits, front pay, pre and post-judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT FOUR

(Violation of the New Jersey Conscientious Employee Protection Act, N.J.S.A. 34:19-1, et seq., as to all defendants)

83. Wetjen repeats each and every allegation set forth above as if fully set forth herein at length.

84. Under New Jersey law, an employer may not retaliate against an employee because the employee objects to or refuses to participate in an activity that she reasonably believes is incompatible

with a clear mandate of public policy concerning the public health, safety or welfare; is in violation of a law, rule or regulation and/or is fraudulent or criminal. *N.J.S.A.* 34:19-3(c)(1)-(3).

85. As noted above, Wetjen objected to the manner in which Janover responded to and handled the first terroristic threat made by the male student's mother on January 11, 2017.

86. Wetjen reasonably believed Janover's actions and/or inactions in responding to the terroristic threat made by the male student's mother on January 11, 2017, were incompatible with a clear mandate of public policy concerning the public welfare, and more importantly the students at Ravine Drive Elementary School, because Janover did not follow the proper procedures in handling a terroristic threat made at the school pursuant to Matawan-Aberdeen BOE policy and regulation 8420, Emergency and Crisis Situation; and/or policy and regulation 8461, Reporting Violence, Vandalism, Alcohol and Other Drug Abuse; and/or policy and regulation 8468, Crisis Response.

87. On January 17, 2017, Wetjen objected to Janover's actions and/or inactions when she informed Lieutenant Falco of the terroristic threats made on January 11, 2017.

88. Additionally, on January 19, 2017, Wetjen objected to Janover's actions and/or inactions regarding the terroristic threats made on January 11, 2017, when Wetjen spoke with Barbara Lytle, Wetjen's union representative, to tell Lytle that Wetjen believed Janover failed to report the terroristic threats made on January 11, 2017, to the proper authorities as outlined in the Matawan-Aberdeen BOE's policies and regulations.

89. Then, on January 20, 2017, Wetjen met with Lytle, two police officers from Matawan and the director of security for the school, wherein Wetjen advised of everyone in attendance at the meeting of what had transpired on January 11, 2017, and again on January 12, 2017, and how Wetjen believed

Janover did not respond to these situations in a legal manner and in accordance with the appropriate Matawan-Aberdeen BOE policies and regulations

90. In retaliation for the aforementioned objections, Wetjen was terminated.

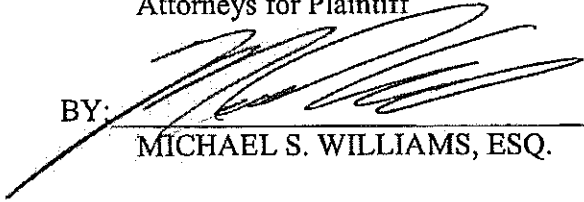
91. As individuals who acted on behalf of or in the interest of the Matawan-Aberdeen BOE with the Matawan-Aberdeen BOE's consent and/or as a supervisory employee, Majka, Walsh and Janover may be held individually liable.

92. As a proximate result of the retaliatory actions against Wetjen, she has suffered emotional and pecuniary damages.

WHEREFORE, Wetjen demands judgment in her favor and against Defendants the Matawan-Aberdeen BOE, Majka, Walsh and Janover on this Count, together with compensatory and equitable relief, all remedies available under the New Jersey Conscientious Employee Protection Act, punitive damages, compensation for lost wages, lost benefits, including health and pension benefits, front pay, pre and post-judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

GOLD, ALBANESE, BARLETTI & LOCASCIO,
LLC

Attorneys for Plaintiff

BY: 

MICHAEL S. WILLIAMS, ESQ.

DATED: February 26, 2018

JURY DEMAND

Plaintiff, Jennifer Wetjen, demands trial by jury of all litigable issues.

GOLD, ALBANESE, BARLETTI & LOCASCIO,
LLC

Attorneys for Plaintiff

BY: 

MICHAEL S. WILLIAMS, ESQ.

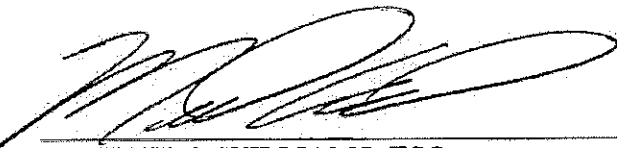
DATED: February 26, 2018

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of R. 4:25-4, Michael S. Williams, Esq., Gold, Albanese, Barletti & Locascio, LLC, counsel for plaintiff, Jennifer Wetjen, is hereby designated as trial counsel on behalf of plaintiff, Jennifer Wetjen.

GOLD, ALBANESE, BARLETTI & LOCASCIO,
LLC

Attorneys for Plaintiff, Jennifer Wetjen

BY: 

MICHAEL S. WILLIAMS, ESQ.

DATED: February 26, 2018

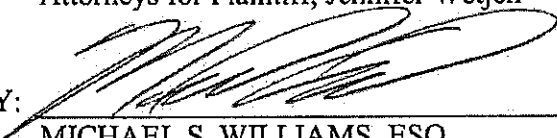
DEMAND FOR INSURANCE

Plaintiff hereby demands that the Defendants, Matawan-Aberdeen Board of Education, Joseph G. Majka, Brian Walsh and Patricia Janover, provide the appropriate proof of insurance coverage in accordance with Court Rule.

GOLD, ALBANESE, BARLETTI & LOCASCIO,
LLC

Attorneys for Plaintiff, Jennifer Wetjen

BY:


MICHAEL S. WILLIAMS, ESQ.

DATED: February 26, 2018

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

Superior Court, Docket No.:

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 CONTEMPLATED? YES ___ NO X

A. If Yes - Parties to Arbitration Proceedings YES ___ NO X

B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings.

4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED? YES ___ NO X

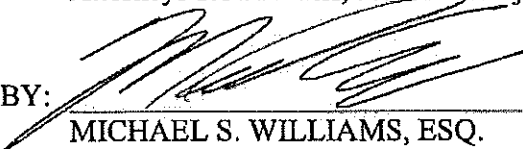
A. If Yes - Parties contemplated to be joined to Arbitration Proceedings.

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.

GOLD, ALBANESE, BARLETTI & LOCASCIO,
LLC

Attorneys for Plaintiff, Jennifer Wetjen

BY:


MICHAEL S. WILLIAMS, ESQ.

DATED: February 26, 2018

PETER H. SPAETH, ESQ., Attorney ID #:016561979

WOLFF, HELIES, SPAETH & LUCAS, P.A.

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(732) 223-5100

Attorneys for Defendant(s), Matawan-Aberdeen Regional School

District Board of Education, Joseph Majka, Brian Walsh, and

Patricia Janover

Our File No.: 953.18810-S

	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff	:	MONMOUTH COUNTY
	:	
JENNIFER WETJEN	:	Docket No. MON-L-684-18
	:	
vs.	:	Civil Action
	:	
Defendants	:	ANSWER,
	:	SEPARATE DEFENSES,
MATAWAN-ABERDEEN REGIONAL	:	NOTICE TO PRODUCE DOCUMENTS,
SCHOOL DISTRICT BOARD OF	:	DEMAND FOR ANSWERS TO
EDUCATION, JOSEPH G. MAJKA,	:	INTERROGATORIES,
BRIAN WALSH, PATRICIA	:	DEMAND FOR WRITTEN STATEMENT
JANOVER,, JOHN DOES 1-10 (said:	:	OF DAMAGES CLAIMED,
names being presently	:	DESIGNATION OF TRIAL COUNSEL
fictitious and unknown	:	AND JURY DEMAND
individuals), and ABC Corps.	:	
1-10 (said names being	:	
presently fictitious and	:	
unknown entities),	:	

Defendant(s), Matawan-Aberdeen Regional School District Board of Education, Joseph Majka, Brian Walsh, and Patricia Janover, answering the Complaint of the plaintiff(s) filed herein for their Answer, say:

AS TO THE PARTIES

1. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in

paragraph 1 and leaves plaintiff(s) to her proofs.

2. Other than the fact that the Matawan-Aberdeen Regional School District Board of Education is a pre-kindergarten through twelfth grade school district, the remaining allegations of paragraph 2 are admitted.

3. Defendant(s) admits the allegations contained in paragraph 3.

4. Defendant(s) admits the allegations contained in paragraph 4.

5. Defendant(s) admits the allegations contained in paragraph 5.

6. The allegations contained in paragraph 6 are not directed towards these defendants and, therefore, they make no answer.

7. The allegations contained in paragraph 7 are not directed towards these defendants and, therefore, they make no answer.

AS TO FACTS COMMON TO ALL COUNTS

8. Defendant(s) denies the allegations contained in paragraph 8.

9. Defendant(s) denies the allegations contained in paragraph 9.

10. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 10 and leaves plaintiff(s) to her proofs.

11. The allegations of paragraph 11 require a legal

conclusion and the defendants leave the plaintiff to her proofs concerning same.

12. Defendant(s) denies the allegations contained in paragraph 12.

13. Defendant(s) denies the allegations contained in paragraph 13.

14. Defendant(s) denies the allegations contained in paragraph 14.

15. Defendant(s) denies the allegations contained in paragraph 15.

16. Defendant(s) denies the allegations contained in paragraph 16.

17. Defendant(s) denies the allegations contained in paragraph 17.

18. Defendant(s) denies the allegations contained in paragraph 18.

19. Defendant(s) denies the allegations contained in paragraph 19.

20. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 20 and leaves plaintiff(s) to her proofs.

21. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 21 and leaves plaintiff(s) to her proofs.

22. Defendant(s) denies the allegations contained in paragraph 22.

23. Defendant(s) admits the allegations contained in paragraph 23.

24. Defendant(s) admits the allegations contained in paragraph 24.

25. Defendant(s) denies the allegations contained in paragraph 25.

26. Defendant(s) admits the allegations contained in paragraph 26.

27. Defendant(s) denies the allegations contained in paragraph 27.

28. Defendant(s) denies the allegations contained in paragraph 28.

29. Defendant(s) admits the allegations contained in paragraph 29.

30. Defendant(s) denies the allegations contained in paragraph 30.

31. Defendant(s) denies the allegations contained in paragraph 31.

32. Defendant(s) denies the allegations contained in paragraph 32.

33. The defendant admits to the installation of an air conditioner in the plaintiff's classroom. The exact date of same

is presently unknown and the plaintiff is left to her proofs.

34. Defendant(s) denies the allegations contained in paragraph 34.

35. The defendants cannot speak to the plaintiff's state of mind and, therefore, can provide no answer to paragraph 35.

36. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 36 and leaves plaintiff(s) to her proofs.

37. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 37 and leaves plaintiff(s) to her proofs.

38. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 38 and leaves plaintiff(s) to her proofs.

39. Defendant(s) denies the allegations contained in paragraph 39.

40. Defendant(s) denies the allegations contained in paragraph 40.

41. Defendant(s) denies the allegations contained in paragraph 41.

42. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 42 and leaves plaintiff(s) to her proofs.

43. Defendant(s) lack sufficient knowledge or information to

form a belief as to the truth of the allegations contained in paragraph 43 and leaves plaintiff(s) to her proofs.

44. Defendant(s) denies the allegations contained in paragraph 44.

45. Defendant(s) denies the allegations contained in paragraph 45.

46. Defendant(s) denies the allegations contained in paragraph 46.

47. Defendant(s) admits the allegations contained in paragraph 47.

48. Defendant(s) admits the allegations contained in paragraph 48.

49. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 49 and leaves plaintiff(s) to her proofs.

50. Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 50 and leaves plaintiff(s) to her proofs.

51. Defendant(s) denies the allegations contained in paragraph 51.

52. Defendant(s) denies the allegations contained in paragraph 52.

53. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in

paragraph 53 and leaves plaintiff(s) to her proofs.

54. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 54 and leaves plaintiff(s) to her proofs.

55. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 55 and leaves plaintiff(s) to her proofs.

56. Defendant(s) admits the allegations contained in paragraph 56.

57. Defendant(s) admit to the meeting outlined and that Mr. Walsh indicated that the plaintiff's emotional status was such that it was best that she not be in the classroom. The defendants admit the remaining allegations of paragraph 57.

58. Defendant(s) admits the allegations contained in paragraph 58.

AS TO THE FIRST COUNT

59. Defendant(s) repeats each and every answer to the allegations contained in the prior Count(s) and makes the same a part hereof as if set forth at length.

60. Defendant(s) admits the allegations contained in paragraph 60.

61. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 61 and leaves plaintiff(s) to her proofs.

62. The allegations of paragraph 62 require a legal conclusion and the defendants leave the plaintiff to her proofs concerning same.

63. Defendant(s) denies the allegations contained in paragraph 63.

64. Defendant(s) denies the allegations contained in paragraph 64.

65. Defendant(s) denies the allegations contained in paragraph 65.

66. Defendant(s) denies the allegations contained in paragraph 66.

67. Defendant(s) denies the allegations contained in paragraph 67.

68. Defendant(s) denies the allegations contained in paragraph 68.

69. Defendant(s) denies the allegations contained in paragraph 69.

70. Defendant(s) denies the allegations contained in paragraph 70.

71. Defendant(s) denies the allegations contained in paragraph 71.

AS TO THE SECOND COUNT

72. Defendant(s) repeats each and every answer to the allegations contained in the prior Count(s) and makes the same a

part hereof as if set forth at length.

73. Defendant(s) denies the allegations contained in paragraph 73.

74. Defendant(s) denies the allegations contained in paragraph 74.

75. Defendant(s) denies the allegations contained in paragraph 75.

AS TO THE THIRD COUNT

76. Defendant(s) repeats each and every answer to the allegations contained in the prior Count(s) and makes the same a part hereof as if set forth at length.

77. Defendant(s) lack sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 77 and leaves plaintiff(s) to her proofs.

78. The allegations of paragraph 78 require a legal conclusion and the defendants leave the plaintiff to her proofs concerning same.

79. Defendant(s) denies the allegations contained in paragraph 79.

80. Defendant(s) denies the allegations contained in paragraph 80.

81. Defendant(s) denies the allegations contained in paragraph 81.

82. Defendant(s) denies the allegations contained in

paragraph 82.

AS TO THE FOURTH COUNT

83. Defendant(s) repeats each and every answer to the allegations contained in the prior Count(s) and makes the same a part hereof as if set forth at length.

84. The allegations of paragraph 84 require a legal conclusion and the defendants leave the plaintiff to her proofs concerning same.

85. Defendant(s) denies the allegations contained in paragraph 85.

86. Defendant(s) denies the allegations contained in paragraph 86.

87. Defendant(s) denies the allegations contained in paragraph 87.

88. Defendant(s) denies the allegations contained in paragraph 88.

89. Defendant(s) denies the allegations contained in paragraph 89.

90. Defendant(s) denies the allegations contained in paragraph 90.

91. Defendant(s) denies the allegations contained in paragraph 91.

92. Defendant(s) denies the allegations contained in paragraph 92.

SEPARATE DEFENSES

1. The defendants deny any and all allegations that they violated the New Jersey Law Against Discrimination in any respect. Likewise, the defendants deny failing to provide the plaintiff with reasonable accommodations, or that any of the allegations as to inappropriate or improper actions by any of the defendants, took place. The defendants deny any actions consistent with harassment, discrimination or a hostile and/or discriminatory work place.

2. Any statements made by defendant Board members were subject to a qualified privilege under the law of defamation.

3. The Complaint fails to state a claim upon which relief may be granted.

4. Pursuant to N.J.S.A. 2A:15-59.1, the cause of action as stated is frivolous and the defendant will, at the conclusion of the matter, seek those sanctions allowed by law.

5. Plaintiff's claim for punitive damages is violative of the United States Constitution as applied to the States and is, therefore, barred. Plaintiff's claim is also barred as to claims against public entities and/or it's employees, agents, or servants.

6. Defendant denies the existence of or breach of any duty and further denies the existence of or breach of any contractual obligation, express or implied.

7. The suit is barred by the Statute of Limitations, N.J.S.A. 2A:14-1 et seq.

8. This defendant is guilty of no intentional misconduct which proximately caused any injury to plaintiff.

9. Plaintiff's claims are barred by laches.

10. Plaintiff's claims are barred by estoppel.

11. Plaintiff's claims are barred by the Doctrine of Unclean Hands.

12. Defendant asserts the applicability of the provisions of N.J.S.A. 59:2-1 and N.J.S.A. 59:2-2, as to the immunities available to the public entity and/or public employee.

13. Defendant asserts the applicability of the provisions of N.J.S.A. 59:2-3 and N.J.S.A. 59:3-2, as to the absence of liability from the exercise of judgment or discretion.

14. Defendant asserts the applicability of the provisions of N.J.S.A. 59:8-3 through 59:8-7 regarding failure to provide adequate Notice of Claim.

15. Defendant asserts the applicability of the provisions of N.J.S.A. 59:8-8 through 59:8-11 regarding failure to timely file Notice of Claim and/or failure to file Notice of Claim as set forth therein.

16. Defendant asserts the applicability of the provisions of N.J.S.A. 59:9-2 concerning interest and limitations on judgment.

17. This defendant is guilty of no intentional misconduct which proximately caused any injury to plaintiff.

18. Any injury occurring to the plaintiff was the direct and

proximate result of the plaintiff's own conduct.

19. Defendants at all times acted in good faith and without malice.

20. The defendant, if involved at all, acted within the scope of their authority and in good faith in the performance of their duties.

21. These defendants acted pursuant to applicable rules and regulations which they reasonably believed were valid.

22. The defendant, if involved at all, acted reasonably and properly under the circumstances.

23. No malicious intent of causing a deprivation of plaintiff's civil rights and/or constitutional rights has been factually set out against the defendant.

24. The defendants deny the allegations contained in plaintiff's Complaint relative to the violation of any applicable portions of the New Jersey Law Against Discrimination and specifically pleads all applicable defenses to said allegations as outlined with in the LAD.

25. At no time did the plaintiff ever complain of, or ask for, any accommodation other than for an air conditioner due to migraine headaches.

26. Defendants plead any and all applicable sections of the New Jersey Tort Claims Act which may be applicable or become applicable as the result of factual allegations made by the

plaintiff.

DEMAND FOR STATEMENT OF DAMAGES

PLEASE TAKE NOTICE that in accordance with Rule 4:5-2, the undersigned requests that within five (5) days hereof upon you, you serve upon us a written statement of the amount of damages claimed in the above-entitled action.

DEMAND FOR JURY TRIAL

Demand is hereby made for a trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, PETER H. SPAETH, ESQUIRE, has been designated as trial counsel on behalf of the defendants in the above-captioned matter.

NOTICE TO PRODUCE DOCUMENTS

PLEASE TAKE NOTICE that, pursuant to Rule 4:18-1, request is hereby made of the plaintiff(s) by these defendants, that you produce true, complete, and accurate copies of the following documents to this office, within thirty (30) days of the date hereof.

1. A copy of the insurance declaration sheet in effect at the time of the within matter.
2. Copies of any and all photographs which plaintiff(s) may have regarding the within matter.
3. Copies of any and all expert reports plaintiff(s) and/or co-defendant(s) may have regarding this incident.

4. A copy of the police report and/or municipal court and/or County, State or Federal reports regarding this incident.

5. Copies of any and all witness statements which plaintiff(s) and/or co-defendant(s) may have regarding the within matter.

6. Copies of any and all medical reports and/or records and/or bills which plaintiff(s) may have regarding the within matter.

7. Copies of any and all prior discovery, including pleadings, motions, Orders, answers to Interrogatories, deposition transcripts, demand for documents, request for admissions, and responses thereto exchanged between parties in this action, with attachments and/or amendments.

8. Copies of any and all contracts plaintiff(s) and/or co-defendant(s) may have regarding the nature of this lawsuit.

9. Provide executed medical authorizations permitting defendant(s) to obtain all medical records from all of plaintiff(s) health care provider(s) and physician(s) involved in this matter including facilities where any diagnostic tests were performed.

10. Provide executed medical authorizations permitting defendant(s) to obtain all medical records from all of plaintiff(s) health care provider(s) and physician(s) including facilities where any diagnostic tests were performed, for all prior and subsequent accidents including worker's compensation claims.

11. Provide executed authorizations permitting defendant(s) to obtain all prescription records from all of plaintiff's pharmacies within the past ten years.

12. Provide executed medical authorizations permitting defendant(s) to obtain all medical records from all of plaintiff(s) family physician(s).

13. If plaintiff has received medical care for any medical condition not accident related within the past ten years, provide executed medical authorizations permitting defendant(s) to obtain all medical records from all of plaintiff's health care providers and physicians regarding plaintiff's non-accident related condition.

14. If a wage claim is being asserted by plaintiff(s), provide executed wage loss verification authorization permitting defendant(s) to obtain records from plaintiff's employer(s).

15. Copies of any and all written documentation including, but not limited to, correspondence, invoices, records, reports and bills which plaintiff(s) may have which relate to plaintiff(s)' damages and liability claims.

16. Provide the phone number, address, and cell phone carrier of the plaintiff together with a copy of the bill for one month prior to the accident, the month of the accident, and two months after the accident.

DEMAND FOR ANSWERS TO INTERROGATORIES

PLEASE TAKE NOTICE that demand is made of the plaintiff to provide answers to Interrogatories, Form A, and also to the enclosed Supplemental Interrogatories within the time prescribed by the Rules of Court.

CERTIFICATION PURSUANT TO RULE 4:5-1

1. Pursuant to Rule 4:5-1, the undersigned hereby certifies that at the time of the filing of this pleading, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding.

2. I certify that the within pleading was filed within the time prescribed by the New Jersey Court Rules. I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

WOLFF, HELIES, SPAETH & LUCAS, PA
Attorneys for Defendant(s),
Matawan-Aberdeen Regional School
District Board of Education,
Joseph Majka, Brian Walsh, and
Patricia Janover

Peter H. Spaeth

By: _____
PETER H. SPAETH

Date: May 7, 2018

JENNIFER WETJEN

Plaintiff

VS

MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF EDUCATION, ET AL

Defendant



20180309113351

Superior Court Of New Jersey

MONMOUTH Venue

Docket Number: MON L 684 18

Person to be served (Name and Address):

BRIAN WALSH
 MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF
 EDUCATION ONE CREST WAY
 ABERDEEN NJ 07747

By serving: BRIAN WALSH**Attorney:** MICHAEL S. WILLIAMS, ESQ.**Papers Served:** SUMMONS AND COMPLAINT, CIS, DEMAND, CERTIFICATION**Service Data:** ☒ Served Successfully ☐ Not Served

Date/Time: 3/9/2018 2:11 PM

☐ Delivered a copy to him/her personally☐ Left a copy with a competent household member over 14 years of age residing therein (Indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. (Indicate name & official title at right)**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ _____

Name of Person Served and relationship/title:

FLORENCE GEORGALASASSISTANT**Description of Person Accepting Service:**

SEX: F AGE: 51-65 HEIGHT: 5'4"-5'8" WEIGHT: OVER 200 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____

Unserved:

- ☐ Defendant is unknown at the address furnished by the attorney
☐ All reasonable inquiries suggest defendant moved to an undetermined address
☐ No such street in municipality
☐ Defendant is evading service
☐ Appears vacant
☐ No response on:

Date/Time: _____
 Date/Time: _____
 Date/Time: _____

Other:

Served Data:

Subscribed and Sworn to me this

12 day of March, 2018
 Notary Signature: _____

ROSEMARY RAMOS

Notary Public of New Jersey
 My Commission Expires Sept. 25, 2018

I, PETER CERRUTO,

was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

3/12/2018
 Date

Name of Private Server: PETER CERRUTO Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

JB

JENNIFER WETJEN

Plaintiff

VS

MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF EDUCATION, ET AL

Defendant



20180309113452

Superior Court Of New Jersey

MONMOUTH Venue

Docket Number: MON L 684 18

Person to be served (Name and Address):

JOSEPH G. MAJKA
 MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF
 EDUCATION ONE CREST WAY
 ABERDEEN NJ 07747

By serving: JOSEPH G. MAJKA**Attorney:** MICHAEL S. WILLIAMS, ESQ.**Papers Served:** SUMMONS AND COMPLAINT, CIS, DEMAND, CERTIFICATION**Service Data:** ☒ Served Successfully ☐ Not Served

Date/Time: 3/9/2018 2:11 PM

☐ Delivered a copy to him/her personally☐ Left a copy with a competent household member over 14 years of age residing therein (Indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. (Indicate name & official title at right)**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

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Name of Person Served and relationship/title:

FLORENCE GEORGALASASSISTANT**Description of Person Accepting Service:**

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☐ No response on:

Date/Time: _____
 Date/Time: _____
 Date/Time: _____

Other:

Served Data:

Subscribed and Sworn to me this

12 day of March 20 18

Notary Signature: ROSEMARY RAMOS

NOTARY PUBLIC OF NEW JERSEY

My Commission Expires Sept. 25, 2018

JB

I, PETER CERRUTO,

was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

3/12/2018
DateName of Private Server: PETER CERRUTO Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

JENNIFER WETJEN

Plaintiff

VS

MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF EDUCATION, ET AL

Defendant



20180309113528

Superior Court Of New Jersey

MONMOUTH Venue

Docket Number: MON L 684 18

Person to be served (Name and Address):

PATRICIA JANOVER
 MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF
 EDUCATION ONE CREST WAY
 ABERDEEN NJ 07747

By serving: PATRICIA JANOVER**Attorney:** MICHAEL S. WILLIAMS, ESQ.**Papers Served:** SUMMONS AND COMPLAINT, CIS, DEMAND, CERTIFICATION**Service Data:** ☒ Served Successfully ☐ Not ServedDate/Time: 3/9/2018 2:11 PM☐ Delivered a copy to him/her personally☐ Left a copy with a competent household member over 14 years of age residing therein (indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. (Indicate name & official title at right)**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ _____

Name of Person Served and relationship/title:

FLORENCE GEORGALASASSISTANT**Description of Person Accepting Service:**SEX: F AGE: 51-65 HEIGHT: 5'4"-5'8" WEIGHT: OVER 200 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____**Unserved:**

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☐ No such street in municipality
☐ Defendant is evading service
☐ Appears vacant
☐ No response on:

Date/Time: _____
 Date/Time: _____
 Date/Time: _____

Other:

Served Data:

Subscribed and Sworn to me this

12 day of March, 20 18
ROSEMARY RAMOS
 Notary Signature
 Notary Public of New Jersey
 My Commission Expires Sept. 25, 2018
 Name of Notary _____ Commission Expiration _____

I, PETER CERRUTO,

was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

3/12/2018
 Date

Name of Private Server: PETER CERRUTO Address: 2009 Morris Avenue Union, NJ 07083 Phone: (800) 672-1952

JENNIFER WETJEN

Plaintiff

VS

MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF EDUCATION, ET AL

Defendant



20180309112807

Superior Court Of New Jersey

MONMOUTH Venue

Docket Number: MON L 684 18

Person to be served (Name and Address):MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD OF
EDUCATIONONE CREST WAY
ABERDEEN NJ 07747**By serving:** MATAWAN-ABERDEEN REGIONAL SCHOOL DISTRICT BOARD
OF EDUCATION**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ _____

Attorney: MICHAEL S. WILLIAMS, ESQ.**Papers Served:** SUMMONS AND COMPLAINT, CIS, DEMAND,
CERTIFICATION

Name of Person Served and relationship/title:

Service Data: ☒ Served Successfully ☐ Not ServedDate/Time: 3/9/2018 2:10 PM☐ Delivered a copy to him/her personallyFLORENCE GEORGALASASSISTANT☐ Left a copy with a competent household member over 14 years of age
residing therein (indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent,
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- ☐ Defendant is evading service
- ☐ Appears vacant
- ☐ No response on:

Date/Time: _____

Date/Time: _____

Date/Time: _____

Other:

Served Data:

Subscribed and Sworn to me this

12 day of March, 20 18

Notary Signature: _____

ROSEMARY RAMOS

NOTARY PUBLIC OF NEW JERSEY

Name of Notary _____ Commission Expiration _____

My Commission Expires Sept. 25, 2018

I, PETER CERRUTO,was at the time of service a competent adult, over the age
of 18 and not having direct interest in the litigation. I declare
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correct.

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3/12/2018
DateName of Private Server: PETER CERRUTO Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952**JB**