

ANAPOLWEISS

Ryan D. Hurd, Esquire
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September 19, 2016

VIA FIRST CLASS MAIL

Ocean County Superior Court
Law Division
118 Washington Street
Toms River, New Jersey 08754

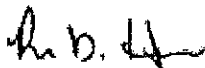
Re: **Yvonne Yaar-Sharkey, Individually and as Administratrix Ad Prosequendum
and Administratrix of the Estate of Neil Torian Van De Putte, Deceased v.
Andrew J. Slota, et al**
Docket No.: OCN-L-2163-16

Dear Clerk:

Enclosed please find an original and two (2) copies of Plaintiff's Notice of Motion for Admission of James R. Ronca, Esquire Pro Hac Vice. Kindly file the original with the Court and return a "filed" time-stamped copy to me in the enclosed self addressed, stamped envelope. Please charge our firm's account (#140430) for the filing of this Complaint.

Thank you for your attention in this matter.

Sincerely,

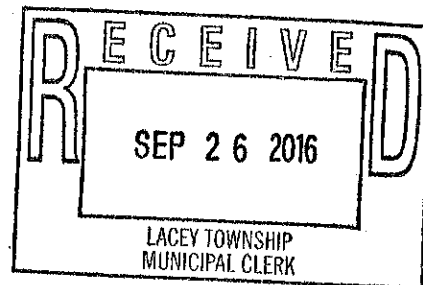


Ryan D. Hurd

RDH/ay

Enclosure

cc: Andrew J. Slota
Lacey Township Police Department
Township of Lacey, a/k/a Lacey Township
Honorable A. Tronccone, J.S.C.



ANAPOL WEISS

BY: JAMES R. RONCA, ESQUIRE
DAVID S. SENOFF, ESQUIRE
RYAN D. HURD, ESQUIRE

NJ I.D. NOs. 049721992 / 022402007

One Logan Square
130 N. 18th Street, Suite 1600
Philadelphia, PA 19103
(215) 735-1130

Attorneys for Plaintiff

YVONNE YAAR-SHARKEY :
Individually and as Administratrix Ad :
Prosequendum and Administratrix of the :
ESTATE OF NEIL TORIAN VAN :
DE PUTTE, Deceased :

Plaintiff,

v.

ANDREW J. SLOTA;
LACEY TOWNSHIP POLICE
DEPARTMENT;
TOWNSHIP OF LACEY, a/k/a
LACEY TOWNSHIP
ABC CORPORATIONS A-Z and
JOHN DOE #1-10 (fictitious names
of persons or entities whose identities are
not presently unknown)

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION

OCEAN COUNTY VICINAGE

DOCKET NO.: OCN-L-2163-16

CIVIL ACTION

NOTICE OF MOTION

TO: Andrew J. Slota
814 Center Street
Forked River, NJ 08731

Lacey Township Police Department
808 Lacey Road
Forked River, NJ 08731

Township of Lacey, a/k/a Lacey Township
818 West Lacey Road
Forked River, NJ 08731

PLEASE TAKE NOTICE that on Friday, October 14, 2016 at 9:00 a.m., or as soon
thereafter this motion shall be decided at the earliest convenience of the Court without the need

to be heard on the regular motion calendar by the Honorable Mark A. Troncone, J.S.C. at the Superior Court of New Jersey, Law Division, Ocean County.

Respectfully submitted,

ANAPOL WEISS



Ryan D. Hurd, Esquire
One Logan Square
130 N. 18th Street, Suite 1600
Philadelphia, PA 19103
Telephone: (215) 790-4581
Fax: (215) 875-7740
Email: rhurd@anapolweiss.com

Dated: September 19, 2016

ANAPOL WEISS

BY: JAMES R. RONCA, ESQUIRE
DAVID S. SENOFF, ESQUIRE
RYAN D. HURD, ESQUIRE

NJ I.D. NOs. 049721992 / 022402007

One Logan Square

130 N. 18th Street, Suite 1600

Philadelphia, PA 19103

(215) 735-1130

Attorneys for Plaintiff

YVONNE YAAR-SHARKEY	:	SUPERIOR COURT OF NEW JERSEY
Individually and as Administratrix Ad	:	LAW DIVISION
Prosequendum and Administratrix of the	:	
ESTATE OF NEIL TORIAN VAN	:	<u>OCEAN COUNTY VICINAGE</u>
DE PUTTE, Deceased	:	
Plaintiff,	:	
v.	:	DOCKET NO.: OCN-L-2163-16
ANDREW J. SLOTA;	:	
LACEY TOWNSHIP POLICE	:	CIVIL ACTION
DEPARTMENT;	:	
TOWNSHIP OF LACEY, a/k/a	:	
LACEY TOWNSHIP	:	
ABC CORPORATIONS A-Z and	:	CERTIFICATION OF RYAN D. HURD, ESQ.
JOHN DOE #1-10 (fictitious names	:	IN SUPPORT OF MOTION FOR
of persons or entities whose identities are	:	ADMISSION OF JAMES R. RONCA, ESQ.
not presently unknown)	:	PRO HAC VICE
Defendants.	:	

I, Ryan D. Hurd, Esquire, of full age hereby certify as follows:

1. I am an attorney at law of the State of New Jersey (ID No.: 022402007) and an associate of Anapol Weiss. I have been principally responsible for the handling of this case from its inception.

2. I submit this Certification Pursuant to Rule 1:21 of the Rules of the Superior Court of New Jersey Admission to Practice, to move the court to admit Attorney James R. Ronca to practice in this court and in this civil action as co-counsel for the plaintiff. The scope of *pro hac vice* admission requested includes participation at trial, depositions, and other proceedings in and out of court.

3. Attorney James R. Ronca is a shareholder of the law firm of Anapol Weiss with a principal office located at One Logan Square, 130 N. 18th Street, Suite 1600, Philadelphia, PA 19103.

4. Anapol Weiss additionally has an office located at 1040 N. Kings Highway, Cherry Hill, New Jersey 08002.

5. Attorney James R. Ronca is admitted to practice law and is in good standing in Pennsylvania. He is not, and has not been, suspended or disbarred from the practice of law in any court.

6. Attorney James R. Ronca unequivocally meets the high standards of professional competence and responsibility and should be admitted *pro hac vice* to practice before this Honorable Court in this case.

7. The addresses and telephone numbers for the agencies charged with registration and discipline of attorneys in the states in which the applicant is licensed are: Pennsylvania Bar Association, 100 South Street, Harrisburg, PA 17101 • 800.932.0311; The Disciplinary Board of the Supreme Court of Pennsylvania 16th Floor, Seven Penn Center, 1635 Market Street, Philadelphia, PA 19103, 215.560.6296.

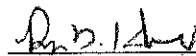
8. If permitted to appear *pro hac vice* in this matter, James R. Ronca will abide by the New Jersey Court Rules.

9. The undersigned or another attorney will continue to personally attend depositions and other proceedings in this case, both in and out of the court.

10. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Respectfully submitted,

ANAPOL WEISS



Ryan D. Hurd, Esquire
One Logan Square
130 N. 18th Street, Suite 1600
Philadelphia, PA 19103
Telephone: (215) 790-4581
Fax: (215) 875-7740
Email: rhurd@anapolweiss.com

Dated: September 19, 2016

ANAPOL WEISS

BY: JAMES R. RONCA, ESQUIRE
DAVID S. SENOFF, ESQUIRE
RYAN D. HURD, ESQUIRE

NJ I.D. NOs. 049721992 / 022402007

One Logan Square
130 N. 18th Street, Suite 1600
Philadelphia, PA 19103
(215) 735-1130

Attorneys for Plaintiff

YVONNE YAAR-SHARKEY	:	SUPERIOR COURT OF NEW JERSEY
Individually and as Administratrix Ad	:	LAW DIVISION
Prosequendum and Administratrix of the	:	
ESTATE OF NEIL TORIAN VAN	:	<u>OCEAN COUNTY VICINAGE</u>
DE PUTTE, Deceased	:	
Plaintiff,	:	
v.	:	DOCKET NO.: OCN-L-2163-16
ANDREW J. SLOTA;	:	
LACEY TOWNSHIP POLICE	:	CIVIL ACTION
DEPARTMENT;	:	
TOWNSHIP OF LACEY, a/k/a	:	
LACEY TOWNSHIP	:	
ABC CORPORATIONS A-Z and	:	CERTIFICATION OF JAMES R. RONCA,
JOHN DOE #1-10 (fictitious names	:	ESQUIRE IN SUPPORT OF MOTION FOR
of persons or entities whose identities are	:	ADMISSION OF PRO HAC VICE
not presently unknown)	:	
Defendants.	:	

I, JAMES R. RONCA, being duly sworn, deposes and says:

1. I am a member of the law firm of Anapol Weiss with offices located at One Logan Square, 130 N. 18th Street, Suite 1600, Philadelphia, PA 19103. I make this certification in support of application for *pro hac vice* admission in this matter in accordance with

Rule 1:21-2.

2. I am a member in good standing and admitted to practice in the State of Pennsylvania under Bar Identification Number 25631.

3. There are no disciplinary proceedings pending against me in any jurisdiction, and there has been no discipline imposed against me by any jurisdiction in the past. During the pendency of this action, I will notify the Court of any change in standing with the bar of any other court, and notify the Court immediately if any actions are instituted against me affecting my standing with the bar of any state.

4. The address and telephone number for the agency charged with registration and discipline in the state(s) in which I am licensed is/are: Pennsylvania Bar Association, 100 South Street, Harrisburg, PA 17101 • 800.932.0311; The Disciplinary Board of the Supreme Court of Pennsylvania, 16th Floor, Seven Penn Center, 1635 Market Street, Philadelphia, PA 19103, 215.560.6296.

5. The responsible attorney is Ryan D. Hurd of the law firm of Anapol Weiss, who is licensed to practice law and in good standing with the Bar of the State of New Jersey.

6. As a condition of my admission, I agree to have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey.

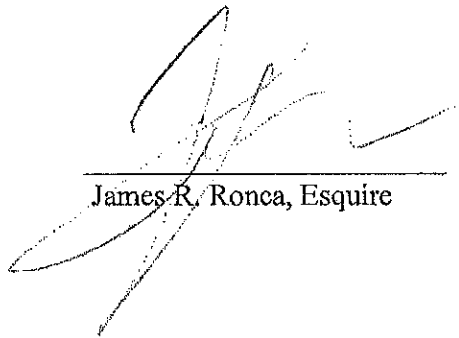
7. As a condition of my admission, I agree to be bound by and comply with the requirements of all applicable rules and pay all fees required by Rule 1:201(b), the Lawyers Fund for Client Protection pursuant to Rule 1:28-2, and the Lawyers Assistance Program pursuant to Rule 1:28B-1(e).

8. As a condition of my admission, I agree that automatic termination of *pro hac vice* admission will occur for failure to make the required annual payment to the New Jersey Lawyers Fund for Client Protection.

9. I respectfully request that I be specially admitted *pro hac vice* to participate in this matter.

10. I hereby certify that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: September 19, 2016



James R. Ronca, Esquire

ANAPOL WEISS

BY: JAMES R. RONCA, ESQUIRE
DAVID S. SENOFF, ESQUIRE
RYAN D. HURD, ESQUIRE

NJ L.D. NOS. 049721992 / 022402007

One Logan Square
130 N. 18th Street, Suite 1600
Philadelphia, PA 19103
(215) 735-1130

Attorneys for Plaintiff

YVONNE YAAR-SHARKEY	:	SUPERIOR COURT OF NEW JERSEY
Individually and as Administratrix Ad	:	LAW DIVISION
Prosequendum and Administratrix of the	:	
ESTATE OF NEIL TORIAN VAN	:	<u>OCEAN COUNTY VICINAGE</u>
DE PUTTE, Deceased	:	
	:	
Plaintiff,	:	
	:	
v.	:	DOCKET NO.: OCN-L-2163-16
	:	
ANDREW J. SLOTA;	:	
LACEY TOWNSHIP POLICE	:	CIVIL ACTION
DEPARTMENT;	:	
TOWNSHIP OF LACEY, a/k/a	:	
LACEY TOWNSHIP	:	
ABC CORPORATIONS A-Z and	:	ORDER
JOHN DOE #1-10 (fictitious names	:	
of persons or entities whose identities are	:	
not presently unknown)	:	
	:	
Defendants,	:	

AND NOW, this day of , 2016, it is hereby ORDERED and
DECREED that the Motion for Admission *Pro Hac Vice* of attorney James R. Ronca to appear
on behalf of Plaintiff, Yvonne Yaar-Sharkey, Individually and as Administratrix Ad
Prosequendum and Administratrix of the Estate of Neil Torian Van De Putte, Deceased, in the
above-captioned matter is hereby GRANTED and attorney James R. Ronca is hereby specially
ADMITTED to the bar of this Court for purposes of this matter.

BY THE COURT:

_____, J.

ANAPOL WEISS

BY: JAMES R. RONCA, ESQUIRE
DAVID S. SENOFF, ESQUIRE
RYAN D. HURD, ESQUIRE

NJ I.D. NOs. 049721992 / 022402007

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Attorneys for Plaintiff

YVONNE YAAR-SHARKEY :
Individually and as Administratrix Ad :
Prosequendum and Administratrix of the :
ESTATE OF NEIL TORIAN VAN :
DE PUTTE, Deceased :

Plaintiff, :

v. :

ANDREW J. SLOTA; :
LACEY TOWNSHIP POLICE :
DEPARTMENT; :
TOWNSHIP OF LACEY, a/k/a :
LACEY TOWNSHIP :
ABC CORPORATIONS A-Z and :
JOHN DOE #1-10 (fictitious names :
of persons or entities whose identities are :
not presently unknown) :

Defendants. :

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION

OCEAN COUNTY VICINAGE

DOCKET NO.: OCN-L-2163-16

CIVIL ACTION

CERTIFICATION OF SERVICE

I, Ryan D. Hurd, Esquire, of full age hereby certify as follows:

1. I am an attorney at law of the State of New Jersey (ID No.: 022402007) and an associate of Anapol Weiss. I have been principally responsible for the handling of this case from its inception.

2. I submit the Certification in support of Plaintiffs' Motion for *Pro Hac Vice* Admission of James R. Ronca, Esquire.

3. This Motion and all supporting papers were served on each Defendant on August 16, 2016 via first class mail.

4. I hereby certify that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

ANAPOL WEISS



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One Logan Square
130 N. 18th Street, Suite 1600
Philadelphia, PA 19103
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Fax: (215) 875-7740
Email: rhurd@anapolweiss.com

Dated: September 19, 2016