

VandePutte

BERRY SAHRADNIK KOTZAS & BENSON, P.C.

Mary Jane Lidaka, Esq. /I.D. #0220719

212 Hooper Avenue, PO Box 757

Toms River, NJ 08754

Tel No.: (732) 349-4800; Fax No.: (732) 505-3073

Attorneys for Defendants Lacey Township and Lacey Township Police Department

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, LACEY TOWNSHIP
and ABC Corporations (A-Z), JOHN DOE (1-
10)

Defendants

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, OCEAN COUNTY

DOCKET NO.: OCN-L-2163-16

Civil Action

**RESPONSES TO NOTICE TO PRODUCE
DOCUMENTS BY DEFENDANTS LACEY
TOWNSHIP AND LACEY TOWNSHIP
POLICE DEPARTMENT**

1. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope and seeks documents that are privileged and confidential. Notwithstanding and without waiving said objection, Plaintiff is in possession of investigation reports prepared by the Toms River Police Department (TRPD), the Ocean County Prosecutor's Office (OCPO) and the Ocean County Sheriff's Office (OCSO), which agencies conducted the investigations into this matter.

2. See answer to number 1 above and photographs attached to defendants' answers to interrogatories.

3. See statements of witnesses contained in the investigation reports prepared by the TRPD and the OCPO. The OCPO took over responsibility for the subject crash investigation. See statements.

4. See documents attached to interrogatory answers.

5. See documents attached to interrogatory answers.

6. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope and not reasonably calculated to lead to the discovery of admissible evidence. Defendants request clarification in order to properly respond.

7. Based upon the list of documents provided by Plaintiff, it appears that Plaintiff has all of these documents in her possession. Additionally, see Advance Media OPRA request to Chief Paprota and the chief's July 17, 2015 letter forwarding same to Prosecutor Coronato attached hereto.

8. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope and seeks documents that may be protected by the attorney client and/or work product privilege and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving said objection, see answer to number 7 above.

9. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope and seeks documents that may be protected by the attorney client and/or work product privilege and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving said objection, based upon the list provided by Plaintiff, these documents are in Plaintiff's possession.

10. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope, and seeks documents that are confidential. Notwithstanding and without waiving said objection, documents will be provided upon the entry of a protective order.

11. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope, and seeks documents that are confidential. Notwithstanding and without waiving said objection, documents will be provided upon the entry of a protective order.

12. The TRPD crash investigation report which is in Plaintiff's possession.

13. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope, and seeks documents that are confidential. Notwithstanding and without waiving said objection, documents will be provided upon the entry of a protective order.

14. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope, and seeks documents that are confidential. Notwithstanding and without waiving said objection, said documents are contained within the internal affairs investigation and will be provided upon entry of a protective order.

15. Objection, the request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, such information is not contained in a computer database and would require a significant diversion of personnel and time to search voluminous records. This request may also encompass confidential personnel records.

16. Objection, the request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, such information is not contained in a computer database and would require a significant diversion of personnel and time to search voluminous records. This request may also encompass confidential personnel records.

17. Upon information and belief, these records are in the possession of the OCPO and/or OCSO.

18. Objection, the request seeks documents protected by HIPPA. Relevant documents may be produced upon entry of a protective order.

19. Not applicable.

20. See vehicle records attached hereto.

21. Not applicable.

22. Based upon the list provided, these documents are in Plaintiff's possession.

23. Objection, the request is vague, overly broad, unduly burdensome, unlimited in scope and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving said objection, see copy of employee handbook attached hereto.

24. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving said objection, no such committees exist.

25. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope, seeks documents that may be protected by attorney client and/or work product privilege and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving said objection, see documents referenced and/or attached to defendants' answers to interrogatories as well as documents in Plaintiff's possession.

26. Other than a photograph of the speedometer, none in possession of these defendants.

27. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope. Notwithstanding and without waiving said objection, see reports prepared by the TRPD Fatal Crash Investigation Unit, OCPO and/or the OCSO which are in Plaintiff's possession.

28. None in possession of these defendants. Defendants reserve the right to amend this response as discovery progresses.

29. Objection, the request is vague, overly broad, unduly burdensome, encompasses documents protected by the attorney client and/or attorney work product privilege and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving said objection, none other than those already in Plaintiff's possession.

30. Not applicable.

31. Not applicable.

32. Other than the photographs attached to Defendants' answers to interrogatories, none in possession of these defendants. Plaintiff is in possession of reports prepared by the TRPD, OCPO and OCSO.

33. None by these defendants; the OCPO handled press releases.

34. See threat assessment documents attached hereto.

35. Objection, the request is vague, overly broad, unduly burdensome, unlimited in time and scope, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving said objection, not applicable.

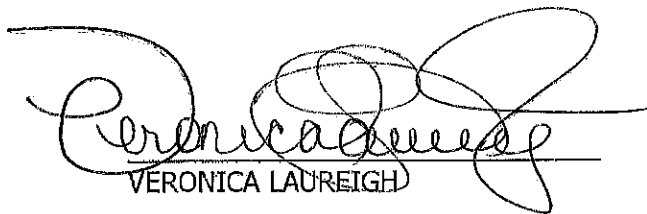
36. CHECK WITH L. SABLE.

37. Not directed to these answering defendants.

CERTIFICATION

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

I hereby certify that the copies of the reports annexed hereto provided by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports provided by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.


VERONICA LAUREIGH

DATED: _____

1/31/2017

