

SUMMONS

Attorney(s) Noemio A. Vellozzi, Esq #041141999
Office Address 59 Wall Street, Suite 201
Town, State, Zip Code Newark, NJ, 07105
Telephone Number (973) 589-3535
Attorney(s) for Plaintiff Jardin Infantil

Jardin Infantil Daycare and Learning Center, LLC

Superior Court of New Jersey

Hudson COUNTY
Law DIVISION

Docket No: L-4655-16

Plaintiff(s)

Vs.

Town of West New York, Frank Martinez and

Danessa Real

Defendant(s)

**CIVIL ACTION
SUMMONS**

2017 FEB 3 PM 10:00
WEST NEW YORK, NJ
RECEIVED

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Clerk of the Superior Court

DATED: _____

Name of Defendant to Be Served: Town of West New York

Address of Defendant to Be Served: 428 60th St, West New York, New Jersey

Directory of Superior Court Deputy Clerk's Offices County Lawyer Referral and Legal Services Offices

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:
Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:
Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House—1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:
Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:
Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:
Deputy Clerk of the Superior Court,
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:
Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:
Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:
Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191

LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

Hudson County Superior Court
Hudson County
583 Newark Avenue
Jersey City NJ 07310

TRACK ASSIGNMENT NOTICE

Court Telephone No (201) 217-3162
Court Hours: 8:30 AM - 4:30 PM

DATE: NOVEMBER 28, 2016
RE: JARDIN INFANTIL DAYCARE ET ALS VS TOWN OF W
EST NEW
DOCKET: HUD L -004855 14

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON. JOSEPH V. ISABELLA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (201) 799-6116.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R. 4:5A-2.

ATTENTION:

ATT: ROEMIO A. VELLOZZI
ROEMIO A. VELLOZZI, PA
59 WALL STREET
SUITE 201
NEWARK NJ 07105

JURIVO

NOEMIO A. VELLOZZI, PA
Noemio A. Vellozzi, Esq. Atty ID: 041411999
59 Wall Street, Suite 201
Newark, NJ 07105
Tel.: (973) 589-3535
Fax: (973) 344-0321
Attorney(s) for Plaintiff(s)
Jardin Infantil Daycare and Learning Center, LLC

FILED
CUSTOMER SERVICE
NOV 22 2016
SUPERIOR COURT OF NEW JERSEY
COUNTY OF HUDSON
CIVIL DIVISION #5

_____	:	SUPERIOR COURT OF NEW JERSEY
	:	HUDSON COUNTY
JARDIN INFANTIL DAYCARE AND	:	LAW DIVISION
LEARNING CENTER, LLC	:	
	:	
Plaintiff	:	
	:	
vs.	:	Docket No. L-4655-16
	:	
	:	CIVIL ACTION
	:	
TOWN OF WEST NEW YORK, FRANK	:	COMPLAINT & JURY DEMAND
MARTINEZ, and DANESSA REAL	:	
	:	
Defendants	:	
_____	:	

The Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, with a principal place of office located at 6017 Hudson Avenue, Apt 22, West New York, New Jersey, by way of Complaint says:

PARTIES

1. Plaintiff, Jardin Infantil Daycare and Learning Center, LLC is a domestic limited liability company authorized to do business in the State of New Jersey.
2. Defendant, Town of West New York, is a municipality organized under the laws of the State of New Jersey situated in the County of Hudson, New Jersey.
3. Defendant, Frank Martinez is and/or was an official, employee, servant or agent and appointee of the defendant, Town of West New York.
4. Defendant, Danessa Real, is and/or was an official, employee, servant or agent and appointee of the defendant, Town of West New York.

BACKGROUND

5. On or about July 19, 2006, the Town of West New York Planning Board approved Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, to operate a daycare at 6029 Hudson Avenue, West New York, New Jersey.
6. Soon thereafter, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, opened its doors for business.
7. The daycare operated by Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, located at 6029 Hudson Avenue is within the Municipal Limits of the Town of West New York.
8. Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, operated the daycare center until the Town of West New York closed them down on November 26, 2014.
9. Plaintiff's, Jardin Infantil Daycare and Learning Center, LLC, operated the daycare located at 6029 Hudson Avenue, West New York, New Jersey without incident and were always approved by the Town of West New York from the date of approvals until November 25, 2014.
10. On or about September 25, 2014, the Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, had the Fire Alarm System inspected and approved by a third party company.
11. On or about September 25, 2014, the Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, had the emergency light system inspected and approved by a licensed third party company.

12. On or about September 25, 2014, the Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, had the fire extinguishers tested and approved by a licensed third party company.
13. On or about September 25, 2014, the Plaintiff, Jardin Infantil Daycare and Learning Center, LLC abated all of the potential fire violations as required by the Town of West New York.
14. Defendant, Frank Martinez, was the fire official for the Town of West New York on November 25, 2014.
15. Defendant, Frank Martinez, signed an Order to close down the daycare on November 25, 2014.
16. Defendant, Danessa Real, was the inspector for the Town of West New York on November 25, 2014.
17. Defendant, Danessa Real, inspected the daycare located at 6029 Hudson Avenue, West New York, New Jersey on or about November 25, 2014.
18. Upon issuance of the Order to close, Defendant, Frank Martinez, stated that they needed permission to the emergency egress over the property owned by the Town of West New York.
19. On or about December 5, 2014, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC obtained a Memorandum from the Town of West New York giving Plaintiff the right to emergency egress requested by, Defendant, Frank Martinez.
20. After obtaining said Memorandum, Defendant, Frank Martinez, still refused to approve the inspection and allow the daycare to reopen.

FIRST COUNT

21. The plaintiff, Jardin Infantil Daycare and Learning Center, LLC repeats and re-alleges the allegations set forth in the complaint as if fully stated herein.
22. Defendant, Frank Martinez, was acting in his official capacity as the Fire Official of the Town of West New York on November 25, 2014.
23. Defendant, Danessa Real, was acting in her official capacity as an inspector of the Town of West New York on November 25, 2014.
24. Defendant, Danessa Real, was negligent in her actions to cite violations which had already been abated on or about September 25, 2014.
25. Defendant, Frank Martinez, was negligent in his actions to issue the Order to close the daycare on November 25, 2014.
26. Defendant, Frank Martinez, in previous years had approved the yearly licenses needed by the daycare for operation.
27. Since time of approvals in 2006, the daycare has run in the same manner with the same egress issues, which were a preexisting condition.
28. As a direct and proximate consequence of the negligence of defendant, Frank Martinez, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, was forced to close down the daycare located at 6029 Hudson Avenue, West New York, New Jersey.
29. As a direct and proximate consequence of the negligence of the defendant, Dannelsa Real, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, was forced to close down the daycare located at 6029 Hudson Avenue, West New York, New Jersey.

30. As a direct and proximate consequence of defendants' negligence, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, has sustained damages.
31. As a direct and proximate consequence of defendants' negligence, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC has lost the only revenue stream which it had and therefore has monetary damages.
32. The negligence of the defendant, Frank Martinez, was gross negligence, justifying an award of punitive and exemplary damages.
33. The negligence of the defendant, Danessa Real, was gross negligence, justifying an award of punitive and exemplary damages.
34. On February 23, 2015, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, duly filed and presented to the Town of West New York, a written claim, a copy of which is attached hereto, marked "Exhibit A" and incorporated by reference. The claim was timed filed under the provisions of Sections 59:8-1 et seq. of the New Jersey Statutes.
35. The claim which was made and presented in this action is brought under and pursuant to Sections 59:1-1 et seq. of the New Jersey Statutes.

WHEREFORE, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, requests judgment against defendants for damages together with attorneys' fees and costs of suit, and such other and further relief as the Court may deem proper.

SECOND COUNT

36. The Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, repeats and re-alleges the allegations set forth in the complaint as if fully stated herein.
37. Defendant, Danessa Real, was reckless in her actions to cite violations which had already been abated on or about September 25, 2014.

38. Defendant, Frank Martinez, was reckless in his actions to issue the Order to close the daycare on November 25, 2014.
39. Defendant, Frank Martinez, in previous years had approved the yearly licenses needed by the daycare for operation.
40. Since time of approvals in 2006, the daycare has run in the same manner with the same egress issues, which were a preexisting condition.
41. As a direct and proximate consequence of the recklessness of defendant, Frank Martinez, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, was forced to close down the daycare located at 6029 Hudson Avenue, West New York, New Jersey.
42. As a direct and proximate consequence of the recklessness of the defendant, Danna Real, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, was forced to close down the daycare located at 6029 Hudson Avenue, West New York, New Jersey.
43. As a direct and proximate consequence of defendants' recklessness, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, has sustained damages.
44. As a direct and proximate consequence of defendants' recklessness, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC has lost the only revenue stream which it had and therefore has monetary damages.

WHEREFORE, Plaintiff, Jardin Infantil Daycare and Learning Center, LLC, requests judgment against defendants for damages together with attorneys' fees and costs of suit, and such other and further relief as the Court may deem proper.

NOEMIO A. VELLOZZI, PA
Attorneys for Plaintiff


By: Noemio A. Vellozzi, Esq.

Dated: *11/21/2016*

DEMAND FOR INSURANCE

Pursuant to Rule 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgement.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Noemio A. Vellozzi, Esq.is hereby designated as trial counsel.

NOEMIO A. VELLOZZI, PA
Attorneys for Plaintiff

Dated:

11/21/2016



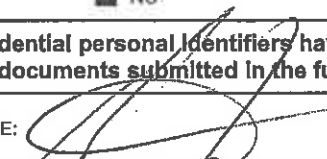


By: Noemio A. Vellozzi, Esq.

CERTIFICATION PURSUANT TO R.4:5-1

I hereby certify, pursuant to R. 4:5-1, that to the best of my knowledge, the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration

Appendix XII-B1

	<h2 style="margin:0;">CIVIL CASE INFORMATION STATEMENT (CIS)</h2> <p style="margin:0;">Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed</p>		FOR USE BY CLERK'S OFFICE ONLY
			PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO.
			AMOUNT:
			OVERPAYMENT: BATCH NUMBER:
ATTORNEY / PRO SE NAME Noemio A. Vellozzi, PA		TELEPHONE NUMBER (973) 589-3535	COUNTY OF VENUE Hudson ▼
FIRM NAME (if applicable) Noemio A. Vellozzi, PA		DOCKET NUMBER (when available)	
OFFICE ADDRESS 59 Wall Street, Suite 201 Newark, New Jersey 07105		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Jardin Infantil Daycare and Learning Center, LLC		CAPTION Jardin Infantil Daycare and Learning Center, LLC vs. Town of West New York, Frank Martines, and Danessa Real	
CASE TYPE NUMBER (See reverse side for listing) 699	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.	
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> Yes <input type="checkbox"/> No			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .			
ATTORNEY SIGNATURE: 			



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for Initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category Putative Class Action Title 59