

FLORIO PERRUCCI STEINHARDT CAPPELLI TIPTON & TAYLOR, LLC

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Attorney(s) for Defendants, City of Bayonne, James Davis, Joseph DeMarco, Leen (Jane) Rickard, Robert Kubert, John Coffey, Esq., Donna Russo, Deborah (Lynn) Steneck, Josephine Spagnola, Linda Vanderweerden, Veronica Smith, Danielle Bielauskas, Susan Wojtkowski, Deborah Falciani, Sharon Ashe-Nadrowski, Juan Perez, Janet Convery, Genny Michane, Brian Della Bella, Terrence Malloy and William Weaver

SINCERRAE ROSS,

Plaintiff,

v.

CITY OF BAYONNE, JAMES M. DAVIS,
JAMES M. DAVIS, ET AL.

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, HUDSON COUNTY

DOCKET NO: HUD-L- 1625-20

Civil Action

**NOTICE OF BAYONNE DEFENDANTS'
CROSS-MOTION TO REINSTATE
ANSWER AND FOR A PROTECTIVE
ORDER**

TO: Via eCourts to jcervantes@maggslawnj.com

Juan C. Cervantes, Esquire

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Attorney(s) for Plaintiff Sincerrae Ross

COUNSEL:

PLEASE TAKE NOTICE that on Friday, July 21, 2023 at 9:00 am or as soon thereafter as counsel may be heard, the undersigned attorneys for defendants, *City of Bayonne, James Davis, Joseph DeMarco, Leen (Jane) Rickard, Robert Kubert, John Coffey, Esq., Donna Russo, Deborah (Lynn) Steneck, Josephine Spagnola, Linda Vanderweerden, Veronica Smith,*

Danielle Bielauskas, Susan Wojtkowski, Deborah Falciani, Sharon Ashe-Nadrowski, Juan Perez, Janet Convery, Genny Michane, Brian Della Bella, Terrence Malloy and William Weaver (collectively, the “Defendants”), will cross-move before the Superior Court of New Jersey, Law Division, Hudson County, Hudson County Courthouse, 583 Newark Avenue, Jersey City, New Jersey 07306 for an order reinstating Defendants’ Answer and Affirmative Defenses that were previously stricken without prejudice; and for a protective order preventing Plaintiff’s further attempts to disseminate Defendants’ confidential security, safety, personnel, and medical information on social media; and further preventing Plaintiff from attempting to harass and intimidate Defendant Linda Vanderweerden by stalking, following, and recording her in-person and/or by posting disparaging videos on social media.

PLEASE TAKE FURTHER NOTICE that the Bayonne Defendants will rely upon the supporting certifications and exhibits thereto, letter brief, proof of service, and proposed form of order annexed hereto in support of this motion.

This cross-motion is submitted pursuant to R. 1:6-2 for a ruling on the moving papers and without oral argument, unless oral argument is requested by the Court or timely opposition to this cross-motion is filed. A proposed form of Order is included herewith.

Pursuant to R. 1:6-2(d), the following calendar dates have been scheduled:

Discovery End Date:	11-21-2022	Trial Date:	10-24-2023
Pretrial Conference:	None	Calendar Call:	None
Trial Date:	None	Arbitration:	None

**FLORIO PERRUCCI STEINHARDT
CAPPELLI TIPTON & TAYLOR LLC**

Stephen J. Boraske, Esquire
Attorney(s) for Defendants

Dated: July 13, 2023