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Our File No. 52215.0060

October 2, 2023

VIA E-COURTS & OVERNIGHT MAIL

The Honorable Anthony V. D’Elia, J.S.C.
W. J. Brennan Courthouse
583 Newark Ave, 3rd Floor
Jersey City, NJ 07306

Re: Sincerrae Ross v. City of Bayonne, et al.
Docket No. HUD-L-1625-20

Dear Judge D’Elia:

This firm represents Defendants in the above-captioned matter. Please accept this letter and accompanying Certification in lieu of a more formal Brief in Reply to Plaintiff’s September 28, 2023 Opposition (“Opposition”) to Defendants’ Motion to Reinstate Defendants’ Answer and Affirmative Defenses (“Defendants Motion”). Plaintiff’s Motion to Strike Defendants’ Answer and Affirmative Defenses with Prejudice (“Plaintiff’s Motion”) is also currently pending before the Court. Both Motions are returnable on October 6.

I. PLAINTIFF’S OPPOSITION TO DEFENDANTS’ MOTION SHOULD NOT BE CONSIDERED BY THE COURT BECAUSE OF THE LACK OF CANDOR, MISREPRESENTATION, AND FALSEHOODS CONTAINED THEREIN.

As Your Honor may recall, on July 21, 2023, the Parties appeared before the Court seeking the exact same relief as the current pending motions to reinstate and strike with prejudice. Your Honor denied those motions without prejudice. In the short 10 weeks since the Court’s decision, Plaintiff and/or her counsel have:

- (1) unilaterally and without explanation cancelled SEVEN scheduled depositions of Defendants Davis, Rickard, Malloy, Smith, Bielauskas, Wotjkowski, and Vanderweerden. Boraske Reply Cert. at ¶ 2. Plaintiff cancelled these depositions of public employees and officials LESS THAN 24 HOURS before they were scheduled to begin. Id.
- (2) refused to propose dates to reschedule the cancelled depositions or attempt to accomplish any further depositions or discovery. Id. at ¶¶ 3-4; **Ex. A & B.**
- (3) ignored the undersigned’s verbal and written communications regarding Plaintiff and her counsel’s availability for rescheduled depositions. Id.

Accordingly, since the Court's 7/21/23 Order denying Plaintiff's motion to strike with prejudice, the only new "facts" before the Court are: (1) Plaintiff's bad faith cancellation of the 8/2 to 8/4 depositions; and (2) Plaintiff's refusal to communicate with Defendants to reschedule any depositions or otherwise move this matter any closer to a resolution on the merits.

Plaintiff's Motion to Strike should therefore be denied in its entirety because it is an out-of-time motion for reconsideration that was previously adjudicated by the Court. To file again seeking to strike Defendants' answer with prejudice when the only change in underlying facts is Plaintiff's (NOT Defendants') willful non-compliance with the Court's prior discovery orders is inefficient and wastes judicial resources. C.f. DiTrolino v. Antiles, 142 N.J. 253, 278 (1995) (applying the entire controversy doctrine and holding that inefficiency and waste of judicial resources may be considered even when a prior action did not proceed to trial or a judgment on the merits).

Plaintiff glosses over the foregoing in her Opposition first by attempting to waive away her non-compliance with the Court's discovery orders as "[the 8/2 to 8/4] adjournment was the first by Plaintiff." Opposition at 4. Importantly, neither Plaintiff nor her counsel claim they were unavailable for the 8/2 to 8/4 depositions. Instead, Plaintiff continues to cling weakly to the following, borderline incomprehensible excuse:

With the discovery period in this matter having ended with no guarantee of re-opening upon reinstatement of Defendants' Answer, the undersigned could not risk entry of Defendants' proposed Order reinstating their Answer with Plaintiff having not obtained depositions of all Defendants whose depositions Plaintiff had planned on taking.

Id.

As Defendants' have previously explained, Plaintiff's excuse is illogical, internally inconsistent, and contradictory. There was no reason not to proceed with the scheduled depositions because of the "risk of reinstatement" or because Plaintiff may want to take more depositions in the future. Plaintiff could have just as easily objected to Defendants' proposed form of order, requested a case management conference, and taken the position that Defendants' answer should not yet be reinstated—all WITHOUT adjourning last week's depositions.

Plaintiff also appears to take umbrage over Defendants' submission of a proposed form of order to Judge Espinales-Maloney seeking clarification of the Court's December 2022 Order Striking Defendants' Answer Without Prejudice. Plaintiff accuses Defendants of "weaponizing" the Court's 7/21/23 Order through this submission. Id. However, the order was submitted to the Court as a simple courtesy given the passage of time since Judge Espinales-Maloney was last involved in this matter. Boraske Reply Cert. at ¶ 2. The submission was akin to an order resulting from a case management conference or one submitted pursuant to the 5-Day Rule. It was not, as Plaintiff preposterously suggests, "one final act of brazenness..." Opposition at 3-4.

Plaintiff's disingenuous framing of Defendants' submission of a draft form of order to the Court is one of the lesser concerning misrepresentations contained in Plaintiff's Opposition. Plaintiff also alleges:

There has not been one occasion where Defendants have voluntarily offered dates that they would be available for deposition, with exception of dates in July 2023 when the undersigned was unavailable and which were only provided after the undersigned filed his initial Motion to Strike Defendants' Answer with Prejudice and Enter Default. Defendants claim that they have advised the undersigned that they have remained available to be deposed since August of 2023; however, the undersigned has not received any such communication from Defendants nor is there one piece of correspondence reflecting same.

Opposition at 5.

And that Plaintiff's counsel "has attempted to obtain depositions in a piecemeal fashion for the convenience of Defendants. Despite the undersigned's best efforts, Defendants still have not cooperated." Opposition at p. 4, n. 2.

All of these claims are FALSE.

On July 29, the undersigned emailed Plaintiff's counsel and proposed the following dates in August for additional Defendant depositions: 8/17, 8/24 to 8/25, and 8/29 to 9/1. Boraske Reply Cert. at ¶¶ 3-4; **Ex. A & B.** Plaintiff's counsel never responded to this email. Id.

On Monday July 31, the undersigned emailed Plaintiff to follow up on the proposed dates in August for Defendants' depositions. Plaintiff's counsel never responded to this email. Id.

On August 1, Plaintiff's counsel called Defendants' counsel to cancel the 8/2 to 8/4 depositions. The undersigned again reiterated Defendants' availability to be deposed throughout August. Plaintiff's counsel advised he would check with his client and be in touch. Id. at ¶ 5. Defendants' did not hear from Plaintiff or her counsel again for the entire month of August. Id.

On September 13, the undersigned called and texted counsel for Plaintiff regarding the submission of a joint letter to the Court requesting a case management conference. Id. at ¶ 6. Plaintiff did not reply to this communication. Id.

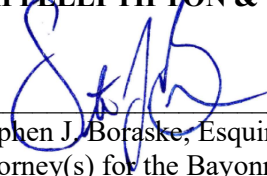
On September 18, the undersigned emailed Plaintiff's counsel to follow up on the various unanswered calls and texts. Id. at ¶ 7; **Ex. C.** Plaintiff's counsel finally responded in the evening on 9/18 that he needs to speak with his client and would then be in touch. Id.

Defendants did not hear from Plaintiff again until September 20 when the motion to strike with prejudice was refiled. Id.

Plaintiff's Opposition to Defendants' Motion should not be considered by the Court given these demonstrated falsehoods and lack of candor contained therein. Defendants' Motion should therefore be granted unopposed. Plaintiff's Motion should also be denied as an untimely motion for reconsideration. Defendants' Answer and Affirmative Defenses should be reinstated for the all of these reasons and those set forth in Defendants' Motion moving papers and opposition to Plaintiff's Motion.

Respectfully submitted,

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



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

cc. *Juan Cervantes, Esq., Plaintiff's Counsel*

FLORIO PERRUCCI STEINHARDT CAPPELLI TIPTON & TAYLOR, LLC

By: Stephen J. Boraske, Esquire (172292015)
1010 Kings Highway South, Bldg. 1, 2nd Floor
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Telephone: (856) 853-5530
Facsimile: (856) 354-8318
Email:
sboraske@floriolaw.com

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 Vanderweeden, 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

**CERTIFICATION OF COUNSEL
STEPHEN BORASKE IN REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION TO
REINSTATE DEFENDANTS'
ANSWER AND AFFIRMATIVE
DEFENSES**

I, STEPHEN J. BORASKE, of full age, being duly sworn according to law, upon my oath certify and say:

1. I am an attorney at law of the State of New Jersey, with the law firm of Florio Perrucci Steinhardt Cappelli Tipton & Taylor LLC, 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 Vanderweeden, 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 Bayonne Defendants”). I am fully familiar with the facts of the within matter.

1. I make this Certification in Support of the Bayonne Defendants’ Reply to Plaintiff’s Opposition to Defendants’ Motion to Reinstate Defendants’ Answer and Affirmative Defenses.

2. Per Plaintiff’s own deposition notices sent on July 13, 2023, the depositions of Defendants Davis, Rickard, Malloy, Smith, Bielauskas, Wotjkowski, and Vanderweerden were confirmed for August 2 to August 4, 2023. On Tuesday, August 1, less than 24 hours before depositions were to begin, Plaintiff’s counsel submitted a letter to the Court objecting to Defendants’ proposed form of order and inexplicably adjourning ALL seven depositions scheduled for last week.

3. On July 29, I emailed Plaintiff’s counsel Juan Cervantes and proposed the following dates in August for additional Defendant depositions: 8/17, 8/24 to 8/25, and 8/29 to 9/1. Plaintiff’s counsel never responded to this email. A true and correct copy of the foregoing email is attached hereto as **Exhibit A**.

4. On July 31, I emailed Plaintiff’s counsel again to follow up on the proposed dates in August for Defendants’ depositions. Plaintiff’s counsel never responded to this email. A true and correct copy of the foregoing email is attached hereto as **Exhibit B**.

5. On August 1, Plaintiff’s counsel called me to cancel the 8/2 to 8/4 depositions as described in Paragraph 2 above. During that call, I reiterated Defendants’ availability to be deposed throughout August. Plaintiff’s counsel advised he would check with his client and be in touch. I never heard back from Plaintiff’s counsel following this conversation.

6. On September 13, I called and texted counsel for Plaintiff regarding the

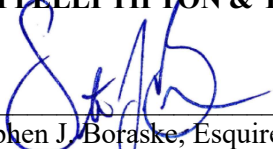
submission of a joint letter to the Court requesting a case management conference. Plaintiff's counsel did not reply to this communication.

7. On September 18, I emailed Plaintiff's counsel to follow up on the various unanswered calls and texts. A true and correct copy of the foregoing email is attached hereto as **Exhibit C**. Plaintiff's counsel finally responded via text in the evening on 9/18 that he needs to speak with his client and would then be in touch.

8. I did not hear from Plaintiff's counsel again until the motion to strike with prejudice was refiled on or about September 20, 2023.

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

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



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

Exhibit A

Stephen Boraske

From: Stephen Boraske
Sent: Saturday, July 29, 2023 2:11 PM
To: Juan C. Cervantes, Esq.
Cc: Morgan Orozco; Nancy Watson
Subject: RE: Ross v. Bayonne Depositions

Importance: High

Juan,

Can you please confirm the below schedule for next week as soon as possible? All are acceptable via Zoom. Trying to do three on Thursday 10 am, 12 pm, 2 pm... please let me know if you have any concerns.

Scheduled Deponents	Date & Time
Susan Wojtkowski	8/2 at 10:00 am
Terrence Malloy	8/2 at 2:00 pm
Veronica Smith	8/3 at 10:00 am
Jane Rickard	8/3 at 12:00 pm
Danielle Bielauskas	8/3 at 2:00 pm
Linda Vanderweeden	8/4 at 10:00 am
James Davis	8/4 at 2:00 pm

As for remaining/additional deps, I know you mentioned your August is packed. The below days work for me – if you are available and want to squeeze additional deps in, please let me know which Defendants and what days.

8/17, 8/24-8/25, 8/29-9/1

Thank you.

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To: Stephen Boraske <SBoraske@floriolaw.com>
Cc: Morgan Orozco <morozco@maggslawnj.com>; Nancy Watson <NWatson@floriolaw.com>
Subject: RE: Ross v. Bayonne Depositions

Neutral (From: jcervantes@maggslawnj.com, External)

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Steve,

My client indicated that she does not wish to adjourn the motion date and that she does not want me to consent to any adjournment requests. As such, I am retracting my offer to request an adjournment. Thank you.

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One cycle gives us an August 4th return date. How do we square that with the rescheduled deps?

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From: Juan C. Cervantes, Esq. <jcervantes@maggslawnj.com>
Sent: Thursday, July 13, 2023 10:30:50 AM
To: Stephen Boraske <SBoraske@floriolaw.com>
Cc: Morgan Orozco <morozco@maggslawnj.com>; Nancy Watson <NWatson@floriolaw.com>
Subject: RE: Ross v. Bayonne Depositions

Steve,

We'll get notices out to you, the deps are going to proceed via zoom there is no reason why they need to be in person. I will get out a one-cycle adjournment request to the Court for our motion, please confirm your consent for same.

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From: Stephen Boraske <SBoraske@floriolaw.com>
Sent: Wednesday, July 12, 2023 7:52 PM
To: Juan C. Cervantes, Esq. <jcervantes@maggslawnj.com>
Cc: Morgan Orozco <morozco@maggslawnj.com>; Nancy Watson <NWatson@floriolaw.com>
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Exhibit B

Stephen Boraske

From: Stephen Boraske
Sent: Monday, July 31, 2023 2:22 PM
To: Juan C. Cervantes, Esq.
Cc: Morgan Orozco; Nancy Watson
Subject: RE: Ross v. Bayonne Depositions
Attachments: eFiled ltr 7.31.23.pdf

Juan – see correspondence filed with court today attached.

Also still looking for confirmation we are all set on your end re: depositions below. Thanks.

Stephen J. Boraske, Esq.
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Subject: RE: Ross v. Bayonne Depositions

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Exhibit C

Stephen Boraske

From: Stephen Boraske
Sent: Monday, September 18, 2023 3:15 PM
To: Juan C. Cervantes, Esq.
Subject: Ross v. Bayonne

Importance: High

Juan – following up on my calls and texts. Please contact me regarding this matter. Thanks.

Stephen J. Boraske, Esquire

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