

DE PIERRO RADDING, LLC

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		: SUPERIOR COURT OF NEW JERSEY
PANTALEO PELLEGRINI,	:	LAW DIVISION
	:	HUDSON COUNTY
Plaintiffs,	:	DOCKET NUMBER:
	:	
vs.	:	
	:	<u>CIVIL ACTION</u>
CITY OF HOBOKEN; MAYOR	:	
RAVINDER SINGH BHALLA; ABC	:	
CORPORATION 1-10, ABC, LLC 1-10,	:	
XYZ PARTNERSHIP 1-10; JOHN DOES	:	VERIFIED COMPLAINT
1-10, and JANE DOES 1-10 (names being	:	
fictitious as true identities are unknown),	:	
	:	
Defendants.	:	
	:	

Plaintiff, Pantaleo Pellegrini, a resident of the City of Hoboken, New Jersey, in his Complaint against the Defendants, the City of Hoboken and Mayor Ravinder Singh Bhalla, says:

PARTIES

A. Plaintiff, Pantaleo Pellegrini is a resident of the City of Hoboken, Hudson County, New Jersey and was the Director of the Department of Health and Human Services of the City of Hoboken until May 3, 2023, and the Director of the Department of Environmental Services until June 2018 (hereinafter referred to as “Plaintiff”).

B. Defendant City of Hoboken, is a municipality incorporated and operating pursuant to the laws of the State of New Jersey (hereinafter referred to singularly and/or collectively as the “City of

Hoboken”, “City” and/or “Hoboken”). Defendant City of Hoboken is sued to affect the full declaratory, compensatory, and punitive damages demanded by Plaintiff.

C. Defendant, Ravinder Singh Bhalla is the duly elected Mayor of the City of Hoboken, New Jersey (“Mayor Bhalla”). Mayor Bhalla is sued in his official and individual capacity to the affect the full declaratory, compensatory, and punitive damages demanded by Plaintiff.

STATEMENT OF FACTS

1. On or about September 19, 2009, Plaintiff was hired by the City of Hoboken as the Director of the Department of Health and Human Services (“HHS”).
2. On or about May 2011, the Division of Parks was transferred to HHS, thus becoming a division of HHS.
3. On or about January 2012, Plaintiff also became the Director of the City of Hoboken’s Department of Environmental Services (“ES”).
4. On or about June 2018, Mayor Bhalla, removed Plaintiff as the Director of ES stating that he wanted to distribute the work more proportionately since no other director was the director of more than one department.
5. In January 2020, at a meeting with Mayor Bhalla, Vijay Chaudhuri, Chief of Staff (“Chaudhuri”), Steven Marks, then Business Administrator of the City Hoboken (“Marks”), Jason Freeman, then Assistant Business Administrator and later Business Administrator of the City of Hoboken (“Freeman”), and Plaintiff, Mayor Bhalla presented a list of the City’s employees stating that he wanted to know which employees if laid off could potentially hurt him politically.
6. Mayor Bhalla turned to Plaintiff saying, “you know the bodies” and told Plaintiff to identify which employees could hurt him politically if laid off.

7. Plaintiff told Mayor Bhalla that this was wrong and that he would not comply with Mayor Bhalla's wrongful request and continued to reiterate same throughout the meeting.
8. In March 2020, upon the outbreak of the Covid-19 pandemic, Mayor Bhalla formed the Covid-19 Task Force and assigned Plaintiff to head said Task Force in collaboration with the Office of Emergency Management ("OEM").
9. In his capacity as Head of said Task Force, among other things, Plaintiff coordinated all testing sites in the City of Hoboken including door to door testing for seniors at senior housing.
10. Plaintiff also initiated a meal program in senior housing to insulate seniors to protect them as best as possible from exposure to the Covid-19 pandemic.
11. Also, Plaintiff, in his capacity as Head of the Task Force, coordinated and implemented the distribution of Covid-19 vaccines to the residents of Hoboken.
12. Plaintiff implemented and coordinated an outdoors program permitting businesses to utilize the parks in Hoboken to operate their gyms, yoga spas, and cycling activities for the wellbeing of the residents of Hoboken during the time such activities were not permitted indoor.
13. Due to the extreme amount of time, efforts, and stress of the responsibilities Plaintiff was shouldered with in the protection of the residents of the City of Hoboken from the Covid-19 pandemic, Plaintiff suffers from, among other things, post-traumatic stress disorder and insomnia.
14. Though Plaintiff was highly recognized for his monumental efforts during the Covid-19 pandemic, Plaintiff never received any stipend or increase to his salary.

15. In November 2021, at a dinner at the League of Municipalities, Mayor Bhalla, in the presence of Feeman, and Jennifer Gonzalez, Director of ES (“Gonzalez”), informed Plaintiff that he was going to name the soccer field at the Northwest Park after Plaintiff.
16. In January 2022, there was a meeting of Hoboken’s Cannabis Review Board (“Cannabis Board”), which consisted of Plaintiff, Councilman Michael Russo, and Freeman.
17. At said meeting, the Cannabis Board decided to award a cannabis medicinal retail location in the City of Hoboken, on Washington Street between 10th and 11th Street, to a certain applicant, Nature’s Touch Med NJ, LLC (“Nature’s Touch”).
18. On or about January 8, 2022, the award to Nature’s Touch was reported in the local news, the Hudson County View.
19. On or about January 14, 2022, during a lunch meeting with Mayor Bhalla, Chaudhuri, Freeman, John Allen, Esq., Corporation Counsel (“Allen”), and Plaintiff, Mayor Bhalla said that he received a telephone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature’s Touch said location. Mayor Bhalla said that he was quashing the award to Nature’s Touch because Mayor Fulop’s wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
20. Upon hearing this, Plaintiff told Mayor Bhalla and all the others present that it was wrong to quash the award to Nature’s Touch because it met all the State’s requirements, including the social justice criteria.
21. Mayor Bhalla reiterated that he was going to quash the award to Nature’s Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give

Mayor Bhalla's law firm contract work. Mayor Bhalla did in fact quash the award to Nature's Touch.

22. Mayor Fulop is Steven M. Fulop, the Mayor of Jersey City, New Jersey. Mr. Fulop's wife is Jaclyn Fulop.
23. Jaclyn Fulop is a co-owner of Story Dispensary of Hoboken, LLC, which had submitted an application to operate a cannabis retail operation in Hoboken, New Jersey.
24. On or about February 24, 2022, there was a meeting of the Cannabis Board to vote on Mayor Fulop's wife's application for the cannabis medicinal retail location on 14th Street in the City of Hoboken.
25. Days prior to the meeting, Plaintiff spoke with Chaudhuri and Freeman, telling them that Plaintiff was extremely concerned about approving the application of Mayor Fulop's wife, as directed by Mayor Bhalla.
26. After Plaintiff expressed his profound concerns with Chaudhuri and Freeman, Mayor Bhalla requested to meet with Plaintiff, and at that meeting Plaintiff reaffirmed his profound concerns about approving the application of Mayor Fulop's wife's company.
27. Mayor Bhalla dismissed Plaintiff's concerns and in an intimidatory and pressuring manner told Plaintiff that the City needed to move forward with approving the application.
28. The day prior to the meeting, Mayor Bhalla again told Plaintiff that he needed the Cannabis Board to approve Mayor Fulop's wife's application.
29. During the Cannabis Board's meeting, prior to the vote, Mayor Bhalla, continuing with his intimidation and pressure, texted Plaintiff telling Plaintiff to stay firm and see it through.

30. The following day, Mayor Bhalla told Plaintiff that he received a call from Mayor Fulop during the Cannabis Board meeting to ensure the award to Mayor Fulop's wife to operate a medicinal cannabis retail location on 14th Street in Hoboken.
31. Mayor Fulop's wife's company was in fact approved to operate a medicinal cannabis retail operation at the designated 14th Street location in Hoboken.
32. On or about June 23, 2022, Plaintiff met with Mayor Bhalla, Chaudhuri, Joseph Castiello, Brendan Gill, and Alixon Collazos.
33. Mr. Castiello had been approved for a medicinal cannabis retail location and wanted to expand it to include also recreational use.
34. Brandon Gill, a friend of Mr. Castiello, was a lobbyist who provided funding to Mayor Bhalla's political campaign.
35. Just prior to the meeting with Mr. Castiello, Mr. Gill, and Ms. Collazos, Chaudhuri, in Plaintiff's presence, told Mayor Bhalla to make sure to tell Mr. Gill the City is fast-tracking the approval of Mr. Castiello's expansion application because of Mr. Gill's relationship with Mr. Castiello, to get something from Mr. Gill in return, such as political finance contributions.
36. Plaintiff immediately told Mayor Bhalla and Chaudhuri that this was wrong and that they should not do it.
37. Disregarding Plaintiff's objections and warning, Mayor Bhalla, at the meeting with Mr. Castiello, Mr. Gill, Ms. Collazos, Chaudhuri, and Plaintiff, stated that Mr. Castiello's expansion application was going to be approved and would be fast-tracked.
38. The approval of Mr. Castiello's application was in fact fast-tracked and approved.

39. Thereafter, on three separate occasions, Plaintiff voted against three other applications which Mayor Bhalla forwarded to the Cannabis Board for approval.
40. Earlier, on or about May 2022, at an HHS bimonthly meeting regarding the Division of Recreation to discuss the implementation of new programs for said Division, Mayor Bhalla, Plaintiff, Freeman, and Jessica Lezcano, Head of the Division of Recreation (“Lezcano”), discussed how Plaintiff was “to support and groom” Lezcano in her new role.
41. However, on September 22, 2022, at a meeting in the Mayor’s Office between Mayor Bhalla, Plaintiff, and Freeman, Mayor Bhalla berated Plaintiff claiming that he did not see any improvements in the Division of Recreation, such as a quicker registration process, new programming, etc.
42. Plaintiff responded that Mayor Bhalla hired Lezcano to handle these purportedly needed improvements, so to the extent any of these concerns were valid, they were Lezcano’s responsibility and not Plaintiff’s.
43. At said meeting, Mayor Bhalla told Plaintiff to “keep your hands off Recreation” and threatened Plaintiff, saying that if Plaintiff remained involved in the Division of Recreation, Plaintiff would “learn the hard way.”
44. Plaintiff responded that if Lezcano was not performing adequately, why was he being blamed for her purported failures?
45. Thereafter, Mayor Bhalla repeated his threats to Plaintiff continuously.
46. On December 8, 2022, Mayor Bhalla and Plaintiff met at the Mayor’s office.

47. At said meeting, Mayor Bhalla, contradicting himself, told Plaintiff that he wanted him to continue to attend and work at functions of the Division of Recreation as Plaintiff had done in the past and continue to groom Lezcano.
48. Also, at said meeting, Mayor Bhalla stated to Plaintiff that Plaintiff's salary range was close to the maximum, and that even though Plaintiff was doing a lot of work, Plaintiff would only be receiving a raise of \$5,000.00.
49. At said meeting, Mayor Bhalla also reiterated that he was still committed to naming the soccer field at the Northwest Park after Plaintiff because of all the work Plaintiff had done.
50. On December 19, 2022, in a meeting at the Mayor's Office between Mayor Bhalla, Plaintiff, and Lezcano, Mayor Bhalla informed Plaintiff that he made the decision to remove the Division of Recreation from HHS.
51. Mayor Bhalla, without giving any explanation for his decision, only told Plaintiff that he wanted Plaintiff to focus on more high-level matters with Mayor Bhalla at the County and State level, since John Allen, Esq., was no longer the First Chief of Staff or Corporation Counsel for the City of Hoboken.
52. From January 2023 to May 2023, Mayor Bhalla did not hold any meetings with HHS.
53. On January 24, 2023, at the Office of the Business Administrator, there was a meeting with the Directors of all Departments, a "Business Administrator's Meeting", along with Freeman, Brian Aloia, Corporation Counsel ("Aloia"), the Assistant Business Administrator, Caleb Stratton ("Stratton"), and Chaudhuri.
54. At said meeting, Chaudhuri and Freeman told all Directors that if they had any meetings with Mayor Bhalla wherein he assigned to any Director any kind of project, the Directors

were to make sure to inform both Chaudhuri and Freeman of what Mayor Bhalla instructed the Directors to do.

55. At said meeting, Plaintiff stated that the Directors take their directions from the Mayor and he did not understand why the Directors were now being required to inform Chaudhuri and Freeman of any such assignments and in essence obtain their approval.

56. Chaudhuri and Freeman responded that they wanted to make sure that Mayor Bhalla was not asking too much of the Directors or more than they may be able to accomplish.

57. Also, at said meeting, Chaudhuri and Freeman instructed the Directors that they were not to speak with Councilwoman Tiffany Fisher and Councilwoman Jennifer Giattino or respond to their emails.

58. Plaintiff strongly questioned and opposed this imposition from Chaudhuri and Freeman because, among other things, as Director of HHS, as any director of any other department of the City of Hoboken, he had to communicate and work with all Members of the City Council.

59. At that time, Plaintiff among his many tasks, was also given the responsibility to deal with a major rodent problem in the City of Hoboken, and Councilwomen Fisher and Giattino were instrumental in Plaintiff's efforts to resolve the problem because the Councilwomen were providing important information to Plaintiff obtained from their constituents. Plaintiff explained this to Chaudhuri and Freeman.

60. Chaudhuri and Freeman ignored Plaintiff and did not answer his questions or comment on Plaintiff's explanation of the importance of the communications with said Councilwomen.

61. Councilwomen Fisher and Giattino were and are political adversaries of Mayor Bhalla.

62. Plaintiff continued to actively communicate and confer with Councilwoman Fisher and Councilwoman Giattino despite Mayor Bhalla's wrongful dictate.
63. In February 2023, the Division of Recreation was removed from HHS and transferred to ES.
64. Mayor Bhalla knew that the Division of Recreation was very important to Plaintiff because of Plaintiff's lifelong dedication and involvement in Hoboken sports and especially soccer programs.
65. On or about March/April 2023, Freeman emailed Plaintiff questioning Plaintiff on his emails pertaining to the rodent infestation problem, specifically inquiring as to which Council Members Plaintiff was emailing.
66. Plaintiff told Freeman that he was emailing all Council Members, including Councilwoman Fisher and Councilwoman Giattino, contrary to Mayor Bhalla's wrongful dictate.
67. On May 2, 2023, Mayor Bhalla's secretary contacted Plaintiff telling him to attend a meeting the next day in the Mayor's Conference Room at 9:00 a.m. with Mayor Bhalla.
68. The next day, on May 3, 2023, Plaintiff, as instructed, arrived at the Mayor's Conference Room to find Mayor Bhalla, Freeman, and Mark Tabakin, Esq., outside counsel to Mayor Bhalla for personnel matters ("Tabakin").
69. At said meeting, Plaintiff was presented with a certain letter dated May 3, 2023, and signed by Mayor Bhalla.
70. Mayor Bhalla told Plaintiff he had two choices: Plaintiff could either resign or would be fired and had until 11:00 a.m. to choose.

71. Mayor Bhalla told Plaintiff that as a friend he was advising Plaintiff to resign because that choice would prove better for Plaintiff five years down the road.
72. Mayor Bhalla's letter stated three purported reasons for his decision to force Plaintiff's resignation or termination.
73. Contrary to Mayor Bhalla's first purported reason, Plaintiff, during his 14 years of service to the City of Hoboken, never had a single negative review, was never reprimanded, and was never brought before the City Council or any court for any complaint during his tenure as Director of HHS and ES. Rather, Plaintiff's many years of distinguished public service are replete with innumerable accomplishments for the City of Hoboken.
74. Contrary to Mayor Bhalla's second purported reason, Plaintiff did everything a director of any department of the City of Hoboken was expected and supposed to do in the context of the negotiation of contracts with vendors.
75. The incidents described in the second purported reason occurred in 2020, yet no one ever raised the issues set forth in the second purported reason until said letter.
76. As for the purported third reason in Mayor Bhalla's letter, Mayor Bhalla did not identify or explain Plaintiff's alleged serious acts of misconduct.
77. Plaintiff, deeply repulsed, upset, and dismayed, left the meeting.
78. Afterwards, at approximately 1:00 p.m., Plaintiff, considering the repercussions of a termination, communicated his resignation to Freeman.
79. Hours after Plaintiff communicated to Freeman his wrongfully forced resignation, he learned from the local media that Mayor Bhalla called for an emergency closed session meeting of the City Council for that evening of May 3, 2023.

80. At approximately 4:20 p.m., Plaintiff called Tabakin inquiring if the closed session meeting of the City Council pertained to him.
81. Tabakin responded that said closed session meeting of the City Council did pertain to Plaintiff's resignation, however, that no vote would be requested or taken on the matter.
82. Tabakin presented to the City Council the Administration's request to investigate Plaintiff's resignation.
83. The Administration requested and the City Council approved a Twenty Thousand Dollars (\$20,000.00) contract to hire Matthew Boxer, Esq., as outside counsel to conduct the investigation.
84. Though said City Council meeting was conducted in closed session, shortly after its conclusion it was leaked to the local press continuing the smear and defame campaign against Plaintiff which commenced earlier that day and has not stopped.
85. Plaintiff recently learned that on or about a day or two prior to the events of May 3, 2023, Mayor Bhalla had conversations with former Mayor Zimmer regarding Mayor Bhalla's decision to ask for Plaintiff's resignation because of alleged inappropriate and criminal conduct.
86. Former Mayor Zimmer stated that as had been done in the past, Plaintiff's resignation should be handled respectfully, and that the Administration should release a public statement thanking Plaintiff for his many years of service to the City of Hoboken.
87. On the afternoon of May 3, 2023, Mayor Bhalla forwarded to former Mayor Zimmer a link to the news article posted on the Hudson County View website regarding Plaintiff's resignation. Former Mayor Zimmer was surprised that the Administration did not publicly thank Plaintiff for his many years of service to the City of Hoboken.

88. Former Mayor Zimmer told Mayor Bhalla, though she acknowledged that if Mayor Bhalla had evidence of any alleged criminal wrongdoing he should refer it to law enforcement, that was not a reason for him to refrain from thanking Plaintiff for his many years of public service.
89. Further, former Mayor Zimmer, as a matter of courtesy, advised Mayor Bhalla that she would be releasing a public statement thanking Plaintiff for his many years of service to the City of Hoboken.
90. In reaction, Mayor Bhalla had his political consultant, Robert Horowitz, speak with former Mayor Zimmer. Mr. Horowitz was also a friend of former Mayor Zimmer and had worked for her political campaigns.
91. Mr. Horowitz, being briefed by Mayor Bhalla, told former Mayor Zimmer that Plaintiff had committed serious criminal wrongdoing that would be referred to law enforcement.
92. Moreover, Mr. Horowitz advised former Mayor Zimmer not to release a public statement thanking Plaintiff for his public service because over the next few days Plaintiff's criminal wrongdoing would be all over the press and that former Mayor Zimmer would not want to be associated with Plaintiff.
93. Former Mayor Zimmer told Mr. Horowitz that it was inappropriate that he was even briefed on confidential personnel matters, let alone act as Mayor Bhalla's intermediary to relay Mayor Bhalla's messages to her.
94. Further, former Mayor Zimmer reconfirmed to Mr. Horowitz her intention to release a public statement thanking Plaintiff for his many years of public service.

95. Afterwards, Mayor Bhalla contacted former Mayor Zimmer stating that an investigation was conducted by Matthew Boxer, Esq., finding Plaintiff's criminal wrongdoing, which was all detailed in a report that recommended referral to law enforcement.
96. Former Mayor Zimmer responded that if Mayor Bhalla had evidence of any alleged criminal wrongdoing, he should refer it to law enforcement, but again reiterated that was not a reason to refrain from thanking Plaintiff for his many years of public service.
97. Mayor Bhalla then said that Plaintiff's wrongdoing started under former Mayor Zimmer's Administration and that was reason for her not to release a public statement thanking Plaintiff for his public service.
98. Former Mayor Zimmer stated that if that were true it would be very concerning to her and requested to see Mr. Boxer's report since she may know of things helpful in understanding whatever occurred.
99. Mayor Bhalla responded that the report was only one page and all it contained was a recommendation to refer the matter to law enforcement.
100. Though Mayor Bhalla spoke of Mr. Boxer's report and its recommendation to refer Plaintiff's alleged evidenced criminal conduct to law enforcement, the City Council had not yet been presented with Mayor Bhalla's request to hire Mr. Boxer to investigate Plaintiff's alleged criminal conduct. Said Mayor Bhalla's request and the City Council's approval to hire Mr. Boxer did not occur until later that evening of May 3, 2023.
101. Former Mayor Zimmer responded to Mayor Bhalla that since she had no personal knowledge of these allegations, she still intended to release a public statement thanking Plaintiff for his public service during her Administration.

102. Mayor Bhalla angrily responded yelling in colorful terms that if former Mayor Zimmer did that she would be “fucking” him “politically.”

103. Further, Mayor Bhalla told former Mayor Zimmer to never contact him again.

COUNT I

Wrongful Termination, Conscientious Employee Protection Act (CEPA)

N.J.S.A 34:19

104. Plaintiff repeats and re-alleges the allegations set forth above as if fully set forth herein.

105. Defendants’ actions as set forth above violated CEPA codified at N.J.S.A. 34:19-1, et seq., in that Plaintiff was subjected to a hostile work environment and was discriminated, harassed, and retaliated against for his actions and statements as described above, including but not limited to:

- a) Plaintiff objecting and telling Defendants that it was wrong to quash the award to Nature’s Touch because it met all of the State’s requirements, including the social justice criteria;
- b) Plaintiff telling Defendants that he was extremely concerned about approving the application of Mayor Fulop’s wife, as directed by Mayor Bhalla;
- c) Plaintiff objecting and telling Defendants that it was wrong for Defendants to tell Mr. Gill that the City is fast-tracking the approval of Mr. Castiello’s expansion application;
- d) Plaintiff strongly questioning and opposing Defendants’ imposition and dictate to refrain from communicating and working with all Members of the City Council,

including Councilwoman Fisher and Councilwoman Giattino, Mayor Bhalla's political adversaries.

e) Plaintiff's continued communication with Councilwoman Fisher and Councilwoman Giattino despite Mayor Bhalla's wrongful dictate.

106. The purported reasons for Defendants' conduct were not the true reasons, but instead were pre-text to Defendants' discriminatory, harassing, and retaliatory animus.

107. These actions as aforesaid constitute violations of CEPA.

WHEREFORE, Plaintiff hereby demands judgment against the Defendants Mayor Bhalla and City of Hoboken, jointly and severally, for the following relief:

- A. Compensatory Damages;
- B. Punitive Damages;
- C. Interest;
- D. Costs of Litigation;
- E. Attorney Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

COUNT II

Defamation

108. Plaintiff repeats and re-alleges the allegations set forth above as if fully set forth herein.

109. Mayor Bhalla made false and defamatory statements to third parties, former Mayor Zimmer, the City Council, and others, claiming that Plaintiff engaged in wrongful and illegal activity.

110. The statements made by Mayor Bhalla to third parties, former Mayor Zimmer, the City Council, and others, were knowingly untrue and made negligently or with malicious intent to harm Plaintiff's reputation.

111. Plaintiff has suffered and will continue to suffer severe economic damages as a direct and proximate result of the false and defamatory statements made by Mayor Bhalla.

WHEREFORE, Plaintiff hereby demands judgment against the Defendants Mayor Bhalla and the City of Hoboken, jointly and severally, for the following relief:

- A. Compensatory Damages;
- B. Punitive Damages;
- C. Interest;
- D. Costs of Litigation;
- E. Attorney Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

COUNT III

Fictitious Defendants

112. Plaintiff repeats and re-alleges the allegations set forth above as if fully set forth herein.

113. That upon information and belief, Plaintiff may have an interest in entities whose identities are unknown at this time by reason of the Defendants' wrongful acts perpetrated against Plaintiff.

WHEREFORE, Plaintiff hereby demands judgment against the Fictitious Defendants for the following relief:

- A. Compensatory Damages;
- B. Punitive Damages;
- C. Interest;
- D. Costs of Litigation;
- E. Attorney Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

Date: May 3, 2024

De Pierro Radding, LLC
Attorneys for Plaintiff
By: /s/ Giovanni De Pierro
Giovanni De Pierro, Esq

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of Rule 4:25-4, the Court is hereby advised that Giovanni De Pierro, Esq., is designated as trial counsel herein.

Date: May 3, 2024

De Pierro Radding, LLC
Attorneys for Plaintiff
By: /s/ Giovanni De Pierro
Giovanni De Pierro, Esq

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues so triable.

Date: May 3, 2024

De Pierro Radding, LLC
Attorneys for Plaintiff
By: /s/ Giovanni De Pierro
Giovanni De Pierro, Esq

CERTIFICATION

This is to certify that the within matter is not the subject of any other action pending in any Court or arbitration proceeding, and that no other such action or proceeding is contemplated.

I am presently aware of no persons or entities who should be joined in the complaint.

Date: May 3, 2024

De Pierro Radding, LLC
Attorneys for Plaintiff
By: /s/ Giovanni De Pierro
Giovanni De Pierro, Esq

VERIFICATION

I, Leo Pellegrini, a citizen of the United States and resident of the State of New Jersey, am the Plaintiff in this action. I have reviewed the foregoing Verified Complaint and declare under penalty of perjury, under the laws of the State of New Jersey that the foregoing facts are correct and true to the best of my knowledge and belief and that those factual matters that are stated upon information and belief are believed by me to be true.

Dated: May 3, 2024


Pantaleo Pellegrini