

**FILED**  
**CUSTOMER SERVICE TEAM**

PATCH #	032
RECEIVED BY	26/15
DA / CR	26/15
ACCT	Bale/13.5
ENT	200/50
JR	

LOUIS A. ZAYAS, ESQ.  
 LAW OFFICES OF LOUIS A. ZAYAS, L.L.C.  
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**FEB 06 2015**  
**SUPERIOR COURT OF NEW JERSEY**  
**COUNTY OF HUDSON**  
**CIVIL DIVISION #1**

(2)

MARK JULVE	)	SUPERIOR COURT OF NEW JERSEY
	)	LAW DIVISION: HUDSON COUNTY
Plaintiff,	)	
vs.	)	Docket No.: <b>Hud - L- 770-15</b>
	)	
THE CITY OF UNION CITY, BRIAN	)	<b>CIVIL ACTION</b>
STACK in his individual and official capacity,	)	
and BRIAN STACK CIVIC ASSOCIATION	)	<b>COMPLAINT</b>
	)	
Defendants.	)	

Plaintiff, Mark Julve, by and through his attorney, LOUIS A. ZAYAS of LAW OFFICES OF LOUIS A. ZAYAS, L.L.C, alleges the following based on information and belief:

**INTRODUCTION**

1. This civil action is brought by Plaintiff for damages under the New Jersey Civil Rights Act ("NJ CRA") for failure to promote based on retaliation for political affiliation and association.

**PARTIES**

2. Plaintiff Mark Julve (hereinafter "Officer Julve" or "Plaintiff") is a citizen of the State of New Jersey, residing in Hudson County. Plaintiff is employed as a police officer of the Union City Police Department.

3. Defendant Brian P. Stack (hereinafter "Mayor Stack" or "Stack") is the duly elected Mayor of Union City, New Jersey. Defendant Stack is sued to affect the full declaratory, injunctive, and compensatory damages demanded by the Plaintiff.

4. Defendant The City of Union City (“Union City”) is a municipality of the State of New Jersey, Bergen County is sued to affect the full declaratory, injunctive, and compensatory damages demanded by the Plaintiff.

5. Defendant Brian Stack Civic Association (“Civic Association”) is a 501(C)(3) non-profit founded by Defendant Mayor Stack. Defendant Civic Organization is sued to affect the full declaratory, injunctive, compensatory damages demanded by Plaintiff.

### **FACTS**

6. Defendant Mayor Stack is currently the Mayor of Union City and a New Jersey State Senator. Through the creation of the Mayor Brian Stack Civic Association, Mayor Stack has created a political machine to foster a “play to play” culture in Hudson County with the primary purpose of promoting, protecting and maintaining Mayor Stack’s political power in Union City and the 33<sup>rd</sup> District, in particular, and Hudson County politics, in general.

7. The Civic Association is the barometer by which Mayor Brian Stack measures and evaluates, in terms of financial donations, the loyalty and political patronage shown by individuals and companies for purposes of conferring and providing government benefits and privileges. Based on the financial donations given to the Civic Association, Mayor Stacks directly or indirectly provides government benefits, such as jobs, government contracts, and other tangible benefits not otherwise available to non-contributors or political supporter.

8. Despite the Civic Association’s volunteer and civic efforts in the community, the Civic Association’s main purpose for existence is to promote, protect and maintain Mayor Stack’s political power in the Union City Police Department.

9. Based on the financial donations to the Civic Association, Mayor Stack determines what government contracts to award to political contributors by using government and public resources to promote or, as if often the case, enrich Mayor Stack and his political confederates, conferring public resources on private financial contributors, rewarding political loyalty by depriving the state and municipality of fair and impartial zoning applications; and enabling town employees to selectively enforce town ordinances against and in favor of individuals depending on their political support and contributions to the Civic Association.

10. Mayor Stack utilizes his political status, and position as Director of Public Safety, as well as his Civic Association as a tool to incorporate “pay-to-play” tactics in the Union City Police Department, in which he rewards those police officers with promotions in exchange for political support and donations to his Civic Association. Those officers who refuse to support Mayor Stack or his Civic Association are punished with adverse employment actions.

11. Plaintiff is currently employed with the Union City Police Department.

12. Plaintiff was hired as a police officer with the Union City Police Department in July 1994.

13. Upon entering the Union City Police Department in 1994, Sergeant Grover Rienhardt told Plaintiff that contributing politically “would get you favorable assignments.”

14. Plaintiff began donating to Brian Stack’s campaign in 1998. In 1998, Plaintiff also supported Stack by knocking on doors and campaigning when Stack was running for Commissioner in Union City.

15. Starting in 1999, Plaintiff began to get involved in Brian Stack's political activities, and assisted in various events including the Thanksgiving Turkey Drives, as well as Christmas Toy Drives.

16. In 1999, Brian Stack spoke to Plaintiff personally, telling Plaintiff to make contributions to Rudy Garcia, who was the mayor of Union City at the time. In 1999, Plaintiff also bought a \$1000 ticket to one of Mayor Stack's functions.

17. Plaintiff was promoted to sergeant in 1999.

18. From 2001 to 2004 Plaintiff continued to buy tickets to contribute to Stack's organization. Additionally from 2007 to 2009 Plaintiff continued to buy tickets. Tickets ranged in price from around \$125 to the current price of around \$175.

19. Due to Plaintiff's personal situation, in which he was separated from his wife in 2010, Plaintiff stopped donating and contributing to Brian Stack and his organization around 2011.

20. Around 2011, Plaintiff soon began suffering from adverse actions and retaliation due to his failure to contribute and donate to Brian Stack and his organization. Additionally, when Plaintiff asked for explanations or answers as to why unusual actions were taken against him, Plaintiff did not receive any answers or explanations.

21. In 2011, Plaintiff was transferred out of the juvenile department to the narcotics department even though he did not request a transfer. This was unusual because transfers to the narcotics department were always done by request. Eight months later, Plaintiff was again transferred back to juvenile.

22. In 2012, Plaintiff was again transferred out, this time to day shift patrol. Again Plaintiff did not request this transfer. The individual that was left in charge of the

detective bureau Michael Bergbauer was a more junior officer. Furthermore, Plaintiff was the desk supervisor on day shift for nearly a year straight. This was a lieutenant's job that he was asked to perform as a sergeant.

23. In 2012, Plaintiff was placed on the Rapid Deployment Force ("RDF"). Previously before Plaintiff joined the RDF, the policy stated that when called out on this assignment, officers would receive "time and a half" compensation. Since Plaintiff entered the RDF this was changed to the lower detail rate. This was despite the fact that there were contractual terms that stated officers could choose between "time and a half", or "pay and a half" compensation. When Plaintiff complained, Captain Nichelle Luster stated that whoever did not like it could resign from the unit.

24. Plaintiff ranked 8<sup>th</sup> on the active lieutenants' promotional list in or about April/May 2013.

25. The promotions from this list were set to take place on June 30, 2013. The table of organization called for five (5) officers to be promoted off the aforementioned active lieutenants' promotional list.

26. Mayor Stack's political crony and supporter, Loaces, ranked 6<sup>th</sup> on the same promotional list. Since the table of organization only called for 5 promotions, Loaces would not be promoted. However, in early May 2013, Mayor Stack announced he would be promoting six (6) officers, instead of the required five (5) officers, off the list promotional list on June 30, 2013.

27. Upon information and belief, Mayor Stack chose to promote 6 officers in order to promote Loaces as a reward for his political patronage.

28. Prior to the scheduled promotion date, over Memorial Day Weekend in May 2013, the officer who ranked 5<sup>th</sup> was arrested for a DWI and was skipped on the promotional list and suspended. Due to the rule of three regarding promotions, Plaintiff was eligible to be promoted to the final opening.

29. However, on June 30, 2013, Defendants promoted only five (5) officers off the promotional list, which included Loaces. Due to this, Plaintiff was passed over for promotion.

30. On December 11, 2013, Plaintiff was given a performance notice as retaliation for his failure to contribute. The notice alleged that Plaintiff had failed to properly oversee a Detective who had not followed up on a missing juvenile in the proper manner. Furthermore, this rule that was allegedly not followed by the Detective, had not been in effect at the time that Plaintiff received the performance notice. The rule that had been applied was vague on who had to notify the prosecutor's office and had not clearly specified who was responsible for doing so. The specification was only applied after the notice had been issued to Plaintiff. Notification was usually done by the investigator in charge of the missing person case.

31. In February 2014, Plaintiff was told by the President of his union, Glenn Gaston, that he was going to a midnight shift as part of a rotation. Plaintiff requested to stay in his current squad due to having a visitation set up with his children for those days off. As of March 8, 2014 Plaintiff started working on this shift.

32. The midnight shift affected Plaintiff monetarily, because Plaintiff was working a midnight shift, while his wife was working during the daytime as a teacher. Despite his wife's teaching job being only two blocks away from Police Headquarters, Plaintiff was

forced to commute separately from his wife spending at least \$600 per month.

Additionally, the fatigue of working the overnight shift prevented Plaintiff from working overtime as frequently as he would have if on a normal shift.

33. On June 16, 2014, Chief Richard Molinari sent out an email stating that due to a manpower shortage on the midnight shift, everyone would do rotation for at least two months.

34. Plaintiff after serving his time on the midnight shift for more than two months requested a change in shifts due to his extenuating family circumstances at the time.

35. Plaintiff requested to come off the midnight shift on three separate occasions including July 25, 2014, August 25, 2014, and October 21, 2014. For the first two requests, Plaintiff received no answer at all. Finally on his third request, he received a reply from Chief Molinari stating that his request was denied because he was needed on the midnight shift in order to “nurture brand new sergeants.” This was essentially performing a lieutenant’s duties despite Plaintiff’s status as a sergeant.

36. Plaintiff at the time was the most senior sergeant in the police department with nearly 15 years of service as a sergeant at the time, and a satisfactory record of performance without any disciplinary actions.

37. Plaintiff was singled out in not being allowed to change his shift. Other sergeants, including those who had been previously arrested and suspended were able to get their picks of shifts. Additionally, two brand new junior sergeants that had been recently promoted were working the day shift at the time of the requests.

38. In September 2014, during a hectic day in the office, several officers had gathered around Plaintiff’s desk for various reasons all relating to legitimate work responsibilities.

As Chief Richard Molinari passed by Plaintiff's desk he asked why so many people were around the desk. Plaintiff explained to Chief Molinari that each person was there for a legitimate reason including changing of shifts, and signing in for details. Despite Plaintiff's legitimate explanation, Captain Wolpert later sent an email requiring Plaintiff to explain the situation. Plaintiff responded detailing the reasons for each individual's presence at the time. However, after Plaintiff's explanation no one ever responded to Plaintiff by e-mail or in any other form.

39. As of September 2014, Plaintiff has been ranked 2<sup>nd</sup> on the eligibility list. In September 2014, Richard Perez was promoted to Lieutenant. There is currently an additional empty spot in the current Table of Organization remaining for a Lieutenant to be promoted. However, upon information and belief, this open position is being held in the event that a political support of Brian Stack is in line for promotion upon the scheduled release of a new eligibility list in February 2015.

40. In October 2014, Plaintiff was preparing for the new Lieutenants and Captains promotional exam that was to be administered. At that time everyone in the night shift and power shift was excused on October 23, 2014 in order to prepare for the exam. Additionally, everyone in the day shift was allowed to leave early from their shifts in order to prepare. However, Plaintiff and Lt. Figueroa each on the midnight shift, were not given time off. As a result, Plaintiff had to use a personal vacation day in order to prepare. When Plaintiff inquired into why he was not given the same benefit, no reason or explanation was given to him. It has been past practice in the police department that people that are politically favored and are contributing politically are able to take off



months to study for the promotional test, and those that are not are strictly held to the official policy and allowed only two weeks off in the summer.

41. Due to Defendants unlawful retaliation, Plaintiff has suffered from several transfers, reduced pay, sham disciplinary notices, and has been forced to serve on unfavorable shifts to impede his promotion. Furthermore, Plaintiff has suffered anxiety, emotional distress, and family issues as a result of Defendants' adverse employment actions.

**COUNT 1**  
**NEW JERSEY CIVIL RIGHTS ACT**  
**N.J.S.A. 10:5-1, *et seq.***  
**POLITICAL ASSOCIATION RETALIATION**

42. Plaintiff repeats and realleges the allegations set forth above as if fully set forth herein.

43. After donating and contributing to Mayor Stack's "pay-to-play" culture for a period of time, Plaintiff was no longer able to continue participation due to personal circumstances. As such, Mayor Stack considered Plaintiff to be disloyal to him, and in turn, utilized his status to retaliate against Plaintiff for his lack of political support, and his failure to contribute to the Brian Stack Civic Association.

44. Defendants retaliated against Plaintiff by transferring him multiple times without notice, by assigning him undesirable shifts, subjecting him to sham disciplinary notices, reducing his pay, and preventing him from gaining promotion.

45. As a direct and proximate result of Defendants' actions, Plaintiff suffered economic and emotional damages in an amount to be determined by a jury.

**COUNT II**  
**NEW JERSEY CIVIL RIGHTS ACT**  
**N.J.S.A. 10:5-1, *et seq.***  
**FREEDOM OF SPEECH**

46. Plaintiff repeats and realleges the allegations set forth above as if fully set forth herein.

47. Plaintiff refused to participate in Mayor Stack's pay-to-play political culture, and refused to join the Brian Stack Civic Association.

48. Mayor Stack perceived Plaintiff as disloyal due to his refusal to campaign for Mayor Stack and join his Civic Association.

49. Due to Plaintiff's exercise of freedom of speech by declining to campaign for Stack and engage in Civic Association fundraisers, Defendants retaliated against Plaintiff in the terms and conditions of his employment by transferring him multiple times without notice, by assigning him undesirable shifts, subjecting him to sham disciplinary notices, reducing his pay, and preventing him from gaining promotion.

50. As a direct and proximate result of Defendants' actions, Plaintiff suffered economic and emotional damages in an amount to be determined by a jury.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally, for the following relief:

- a. Compensatory Damages;
- b. Punitive Damages;
- c. Attorney's fees and costs of suit;
- d. Such other and further relief as the Court deems equitable and just.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury trial as to all issues so triable.

Dated: January 26, 2015

  
\_\_\_\_\_  
LOUIS A. ZAYAS, ESQ.

**DESIGNATION OF TRIAL COUNSEL**

LOUIS A. ZAYAS, ESQ., is designated as trial counsel in this matter.

Dated: January 26, 2015

  
\_\_\_\_\_  
LOUIS A. ZAYAS, ESQ.

**DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS**

Pursuant to R. 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 all or part of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment. If so, please attach a copy of each, or alternative state, under oath and certification: (a) policy number; (b) name and address of insurer; (c) inception and expiration date; (d) names and addresses of all persons insured thereunder; (e) personal injury limits; (f) property damages limits; and (g) medical payment limits.


Date: January 26, 2015

  
\_\_\_\_\_  
LOUIS A. ZAYAS, ESQ.

**CERTIFICATION PURSUANT TO R. 4:5-1**

I certify that the matters in controversy in this action are not subject of any other action pending in any other court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated.

Dated: January 26, 2015

  
LOUIS A. ZAYAS, ESQ.

HUDSON COUNTY SUPERIOR COURT  
HUDSON COUNTY  
582 NEWARK AVENUE  
JERSEY CITY NJ 07306

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 217-5162  
COURT HOURS 8:30 AM - 4:30 PM

DATE: FEBRUARY 27, 2015  
RE: JULVE V THE CITY OF UNION CITY  
DOCKET: HUD L -000770 15

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 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 LISA ROSE

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002  
AT: (201) 795-6908.

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 ACCORDAN

CE  
WITH R. 4:5A-2.

ATTENTION:

ATT: LOUIS A. ZAYAS  
ZAYAS LOUIS A  
8901 KENNEDY BLVD  
STE 58  
NORTH BERGEN NJ 07047

JUVORTI

## IMPORTANT REMINDER

You have recently filed a complaint in the Law Division, Hudson County. Enclosed please find a copy of the complaint marked "Filed" and the Track Assignment Notice (TAN). Please be sure to use the assigned docket number on all future pleadings, correspondence, etc.

You are reminded of the following:

R.4:4-1. requires that the summons is to be issued within 15 days from the date of the Track Assignment Notice.

R.4:4-7. requires that "proof of service" shall (mandatory) be promptly filed with the court within the time during which the person served must respond (35 days) by the person making service or by the party on whose behalf service is made.



"Proof of Service" should be filed with the Judge/Team indicated on the Tan.

Please carefully read, understand and follow R.4:24-1., Time for Completion of Discovery, and R. 4:24-2., Motions Required to Be Made During Discovery Period.

Always be aware of the operative Discovery End Date (DED) for your case. If in doubt, you can contact the Team indicated on the TAN or this information may be found on the Judiciary's website homepage at [www.njcourtsonline.com](http://www.njcourtsonline.com) under the heading "civil discovery end date search."

Mary K. Costello  
Presiding Judge Civil Division

**Appendix XII-B1**

	<b>CIVIL CASE INFORMATION STATEMENT (CIS)</b>		<b>FOR USE BY CLERK'S OFFICE ONLY</b>	
			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 Louis A. Zayas, Esq.		TELEPHONE NUMBER (201) 977-2900	COUNTY OF VENUE Hudson <b>-L- 770-15</b>	
FIRM NAME (if applicable)		DOCKET NUMBER (when available)		
OFFICE ADDRESS 8901 Kennedy Blvd., Suite 5s, North Bergen, NJ 07047		DOCUMENT TYPE Complaint		
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
NAME OF PARTY (e.g., John Doe, Plaintiff) Mark Julve		CAPTION Mark Julve v. The city of Union City, et al.		
CASE TYPE NUMBER (See reverse side for listing) 005	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 type="checkbox"/> UNKNOWN		
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>				
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 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)**

- |  |   |
|--|---|
| 266 HORMONE REPLACEMENT THERAPY (HRT)  | 288 PRUDENTIAL TORT LITIGATION                            |
| 271 ACCUTANE/ISOTRETINOIN              | 289 REGLAN  |
| 274 RISPERDAL/SEROQUEL/ZYPREXA         | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION                |
| 278 ZOMETA/AREZIA                      | 291 PELVIC MESH/GYNECARE                                  |
| 279 GADOLINIUM                         | 292 PELVIC MESH/BARD                                      |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 293 DEPUY ASR HIP IMPLANT LITIGATION                      |
| 282 FOSAMAX                            | 295 ALLODERM REGENERATIVE TISSUE MATRIX                   |
| 284 NUVARING                           | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS       | 297 MIRENA CONTRACEPTIVE DEVICE                           |
| 286 LEVAQUIN                           | 601 ASBESTOS  |
| 287 YAZ/YASMIN/OCELLA                  | 623 PROPECIA  |

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