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*Attorneys for Plaintiffs,*

*Timothy Carter and Lori Carter*

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TIMOTHY CARTER, and LORI CARTER

Plaintiffs,

v.

JERSEY CITY MUNICIPAL UTILITIES  
AUTHORITY, JOSE R. CUNHA,  
individually and in his official capacity, and  
CHARLES SCHAADT, individually and in  
his official capacity,

Defendants.

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY  
DOCKET NO.: BER-L-

CIVIL ACTION

**COMPLAINT & JURY DEMAND**

Plaintiffs, Timothy Carter (hereinafter “Mr. Carter”) and Lori Carter (hereinafter “Ms. Carter”) (jointly hereinafter referred to as “Plaintiffs”), by way of Complaint against Defendants, Jersey City Municipal Utilities Authority (hereinafter “JCMUA”), Jose R. Cunha (hereinafter “Executive Director Cunha”) individually and in his official capacity, and Charles Schaad (hereinafter “Mr. Schaad”), individually and in his official capacity, (jointly hereinafter “Defendants”) states the following:

**NATURE OF THIS ACTION**

1. Plaintiffs bring this action to remedy race discrimination, aiding and abetting race discrimination, and retaliation in violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. (the “NJLAD”).

2. Plaintiffs further bring this action to remedy violations of the New Jersey Wage and Hour Law, N.J.S.A. 34:11-56a et seq. (hereinafter the “NJWHL”) and the New Jersey Wage Payment Law, N.J.S.A. 34:11-4.1 et seq. (hereinafter the “NJWPL”).

**PARTIES**

3. During all times relevant to this action, Plaintiffs are husband and wife residing in the borough of Little Ferry, County of Bergen, State of New Jersey.

4. During all times relevant to this action, Plaintiffs are each “persons” as that term is defined by the NJLAD.

5. During all times relevant to this action JCMUA was a public entity operating at 555 Route 440, City of Jersey City, County of Hudson, State of New Jersey.

6. During all times relevant to this action, JCMUA was Plaintiffs’ “employer” and a “person” as those terms are defined by the NJLAD.

7. During all times relevant to this action, Executive Director Cunha was the Executive Director of the JCMUA and a “person” as that term is defined by the NJLAD.

8. During all times relevant to this action, Mr. Schaadt was an employee of the JCMUA and a “person” as that term is defined by the NJLAD.

**VENUE**

9. Venue appropriately lies in Bergen County pursuant to R. 4:3-2.

**FACTS COMMON TO COUNTS AS TO TIMOTHY CARTER**

10. Mr. Carter is an African American male.

11. Mr. Carter has over twenty (20) years’ experience in plumbing, excavation, and demolition.

12. JCMUA hired Mr. Carter in July of 2017 as its Construction Supervisor.

13. As the JCMUA Construction Supervisor, Mr. Carter was and remains responsible for, *inter alia*, supervising the repair of collapsed sewers, catch basins, and Jersey City roadways.

14. Mr. Carter is the only JCMUA employee of color serving the JCMUA in a Supervisor role.

15. When the JCMUA hired Mr. Carter, Mr. Schaadt was a JCMUA mechanic in the JCMUA's West Side Plant.

16. Mr. Schaadt's responsibilities as a mechanic included, *inter alia*, servicing JCMUA vehicles assigned to Mr. Carter and his construction crews.

17. As a mechanic at the West Side Plant, Mr. Schaadt regularly interacted with Mr. Carter.

18. As a JCMUA mechanic, Mr. Schaadt openly espoused white supremacist beliefs in the JCMUA workplace.

19. Mr. Schaadt was so brazen in the JCMUA workplace concerning his white supremacist ideology that he screwed a photo of a white supremacist with a Nazi War Eagle tattoo and a tattoo of the Schutzstaffel Armanen rune (commonly referred to as the "S.S. lightning bolt") under plastic in the window of the door between the West Side Plant's garage and its cafeteria.

20. Despite repeated complaints and requests for its removal, Mr. Schaadt refused to remove the photo of the white supremacist and it remained secured to the door's window for months.

21. Mr. Schaadt believed it funny to tell his colleague, JCMUA Supervisor of Maintenance, John Mortillaro (hereinafter "Mr. Mortillaro"), that the white supremacist with Nazi tattoos in the photograph was Mr. Mortillaro.

22. Mr. Mortillaro, not wanting to be associated with the white supremacist image, reported to William Golden, JCMUA's Chief of Operations (hereinafter "Mr. Golden") that Mr. Schaadt posted the photo, refused to remove the photo, and was "joking" to colleagues that he, Mr. Mortillaro, was the white supremacist in the image.

23. In response to Mr. Mortillaro's complaint that Mr. Schaadt posted a photo of an individual with Nazi tattoos in a visible location, Mr. Golden took no remedial action.

24. Despite openly espousing white supremacist beliefs at the JCMUA West Side Plant, JCMUA promoted Mr. Schaadt to Fleet Truck Mechanic Supervisor.

25. Consistent with Mr. Schaadt holding white supremacist beliefs, after his promotion, he targeted the only JCMUA Supervisor of color, Mr. Carter, for harassment.

26. In July of 2020, Mr. Schaadt began parking his vehicle in the space Mr. Carter had regularly parked.

27. On more than one occasion, Mr. Carter reported to Executive Director Cunha that Mr. Schaadt was parking in his parking spot.

28. Executive Director Cunha made multiple requests to Mr. Schaadt that he cease parking in Mr. Carter's parking spot.

29. After Executive Director Cunha's repeated requests, Mr. Schaadt finally ceased parking in Mr. Carter's parking spot.

30. In August of 2020, Mr. Schaadt, with his bare hands, picked up a dead possum and put it inside the JCMUA vehicle assigned to Mr. Carter.

31. Mr. Schaadt then moved the dead possum from inside Mr. Carter's JCMUA vehicle to outside Mr. Carter's vehicle so its bloody dead body rested on the vehicle's side view mirror.

32. Mr. Schaadt did this in the presence of Teddy Boatwright, a JCMUA vacuum truck operator, and Mr. Mortillaro.

33. A photo of the dead possum hanging over the side view mirror of Mr. Carter's JCMUA vehicle is attached hereto as **Exhibit A**.

34. Despite Mr. Carter's best efforts to clean the vehicle, Mr. Carter could not remove the stench of the dead animal from his vehicle.

35. Despite Mr. Carter's efforts to clean the vehicle, he nonetheless executed his JCMUA duties for weeks in the stench of the dead animal exacerbated by the hot August sun.

36. Following Mr. Schaadt placing the dead possum in Mr. Carter's JCMUA vehicle, Mr. Schaadt used his authority as the JCMUA Fleet Truck Mechanic Supervisor to further harass Mr. Carter.

37. Mr. Schaadt made a false report that Mr. Carter damaged his JCMUA vehicle.

38. Because Mr. Schaadt put a dead possum in Mr. Carter's JCMUA vehicle and was now making false reports that Mr. Carter damaged his JCMUA vehicle, on September 1, 2020, Mr. Carter emailed Executive Director Cunha copying several other JCMUA personnel, reporting Mr. Schaadt's harassment.

39. Neither Executive Director Cunha, nor any other JCMUA representative copied on the email followed up on Mr. Carter's complaint.

40. JCMUA ignored Mr. Carter's complaint concerning Mr. Schaadt's outrageous behavior despite Mr. Schaadt's white supremacist sympathies being no secret at the JCMUA.

41. Because the JCMUA provided no consequence for Mr. Schaadt's racial harassment and discrimination, and with the JCMUA failing to support Mr. Carter in his attempts to navigate

Mr. Schaadt's severe and pervasive workplace racial discrimination, Mr. Schaadt continued to harass Mr. Carter.

42. On Christmas Eve, Thursday, December 24, 2020, Mr. Carter and his crew addressed an emergent sewer collapse.

43. After completion of that day's work, the emergency keys for Mr. Carter's JCMUA vehicle were given to Mr. Schaadt.

44. On Monday, December 28, 2020, Mr. Carter requested Mr. Schaadt return to him the emergency keys, so that the keys would be available for future emergencies.

45. On Monday December 28, 2020, Mr. Schaadt refused to return the emergency keys to Mr. Carter.

46. When Mr. Schaadt refused to return the keys to Mr. Carter's JCMUA vehicle, Mr. Schaadt raised his voice, got in Mr. Carter's face, and yelled in an intimidating and threatening manner, "you picked the right white boy to mess with. This white boy isn't afraid of you."

47. Mr. Golden was present when Mr. Schaadt yelled this racially charged threat in Mr. Carter's face, but again took no responsive action.

48. Mr. Carter reported the incident by email the following day, December 29, 2020.

49. JCMUA again engaged in no remedial measures in response to Mr. Carter's December 29, 2020 complaint.

50. When Mr. Carter inquired as to the complaint's status with JCMUA Human Resources, JCMUA was invariably unhelpful, responding only that Human Resources needed to speak with Executive Director Cunha before action could be taken.

51. In February of 2021, Mr. Carter went to use the West Side Plant's restroom in the Safety Officer's office.

52. Upon entering the office, Mr. Carter saw the restroom light on.

53. Mr. Carter asked if anyone was inside and Mr. Schaadt responded, recognizing Mr. Carter's voice, "Yeah, I'm in here."

54. Mr. Carter entered the restroom shortly after Mr. Schaadt exited, lifted the toilet seat, and found Mr. Schaadt left his feces in the toilet.

55. Mr. Carter flushed Mr. Schaadt's feces and sprayed the bathroom with Lysol.

56. When Mr. Carter saw Mr. Golden, he reported to Mr. Golden that Mr. Schaadt had left his feces in the toilet for Mr. Carter.

57. Mr. Golden again engaged in no responsive remedial measures.

58. Mr. Schaadt has been the subject of multiple other complaints of discrimination.

59. Only after Mr. Carter repeatedly followed up, insisting that JCMUA respond to his complaint, did the JCMUA take any responsive action.

60. JCMUA interviewed Mr. Carter in February of 2021 whereat Mr. Carter provided the JCMUA and Executive Director Cunha a photo of the dead possum on the JCMUA vehicle side view mirror attached hereto as **Exhibit A**.

61. Despite having definitive proof that a dead possum was put on Mr. Carter's JCMUA vehicle, the JCMUA again took no remedial action.

62. To date, the JCMUA has not engaged in any remedial measures.

63. Despite the conduct set forth herein and other complaints concerning Mr. Schaadt, the JCMUA, he has not been subject to disciplinary actions as a result of the conduct set forth herein.

**FACTS COMMON TO COUNTS AS TO LORI CARTER**

64. In June of 2019 JCMUA hired Ms. Carter as an Administrative Assistant supporting JCMUA traffic control.

65. The JCMUA traffic control program offers employment to individuals, including individuals with non-violent criminal records, as “flaggers” at construction sites.

66. This program is informally referred to as the “Flagger Department.”

67. The JCMUA “flaggers” responsibilities include aiding in pedestrian and vehicle traffic around construction sites, i.e. assisting pedestrians, assisting in detouring traffic, assisting with street closures, and otherwise assisting in traffic control.

68. In January of 2020, JCMUA gave Ms. Carter a raise.

69. Ms. Carter’s job duties did not change following her receipt of the January 2020 raise.

70. Prior to her raise in January 2020, Ms. Carter received holiday and overtime pay.

71. After her raise in January 2020, Ms. Carter received holiday and overtime pay.

72. Prior to the Covid-19 pandemic, Ms. Carter’s responsibilities included scheduling program participants at the construction sites, coordinating with the construction sites, invoicing, and review of program jobs.

73. Prior to the Covid-19 pandemic, program participants clocked in at the trailer in the parking lot of the JCMUA offices where Ms. Carter worked. The JCMUA fulltime employees then drove JCMUA program participants to the respective construction sites. At the end of the day, the JCMUA fulltime employees drove the program participants back to the JCMUA trailer where the program participants clocked out.

74. In January of 2020, Ms. Carter worked 11.5 hours of overtime.



75. These 11.5 hours were set forth on an “infrastructure Maintenance Overtime Report” and approved with the signature of Ms. Carter’s director supervisor.

76. JCMUA did not pay Ms. Carter for the January 2020 11.5 hours of approved overtime.

77. Following the outbreak of the Covid-19 pandemic, one of the fulltime employees who drove the program participants contracted covid and died. As a result of this and Covid-19 restrictions, the JCMUA no longer provided transportation for program participants to and from construction sites.

78. To keep the program functioning during the Covid-19 pandemic, JCMUA allowed program participants to secure their own transportation to the construction sites. Once at a construction site, the program participants were directed to take a photo of themselves at the site as proof in lieu of “clocking in” and send the photo to the JMCUA.

79. At the end of the workday, program participants were directed to take another photo as proof of their “clocking out.” The program participants were directed to send this photo to the JCMUA as proof of their “clocking out.”

80. The JCMUA traffic control program employed between sixty (60) and a hundred and twenty (120) people every day. Therefore, Ms. Carter was tasked with entering the data for these individuals both when they clocked in and again when they clocked out.

81. Because of these additional time intensive responsibilities, Ms. Carter worked substantial overtime.

82. Ms. Carter’s supervisor, recognizing Ms. Carter was working substantial overtime, directed Ms. Carter to track and submit her overtime.

83. From September of 2020 through mid-December 2020, Ms. Carter worked one-hundred and sixty (160) hours of overtime for which she was not paid.

84. Ms. Carter's direct Supervisor approved these one hundred and sixty (160) hours of overtime on Infrastructure Maintenance Overtime Reports.

85. Ms. Carter worked additional overtime for which JCMUA did pay Ms. Carter.

86. While Ms. Carter initially performed these duties with another colleague, that colleague contracted Covid-19 and remained out on an extended medical leave.

87. Additionally, Ms. Carter's direct supervisor also contracted Covid-19 and was out on a three (3) week medical leave.

88. During this time, Ms. Carter kept the JCMUA Traffic Control program or Flagger Department running and worked an additional one hundred and sixteen (116) hours of overtime.

89. Ms. Carter emailed Executive Director Cunha several times regarding the JCMUA not paying overtime.

90. Because JCMUA Flagger Department was short staffed, Ms. Carter continued to work overtime to ensure that the program participants had jobs as many participants relied on the program for income.

91. Ms. Carter was likewise not compensated for this additional overtime.

92. While JCMUA had advised Ms. Carter that it would pay her overtime, following her husband's complaint of racial discrimination, JCMUA declined to pay Ms. Carter overtime for her hours worked.

93. As a result of Mr. Carter's complaints of racial discrimination and Ms. Carter's complaints that she has not been paid overtime, JCMUA transferred Ms. Carter's employment out of the Flagger Department.

94. As a result of this transfer, Ms. Carter was no longer earning overtime.

**FIRST CAUSE OF ACTION**  
**(RACE DISCRIMINATION IN VIOLATION OF THE NJLAD)**

95. Plaintiffs hereby repeat and reallege all allegations set forth above as if set forth at length herein.

96. By and through the actions described above, JCMUA discriminated against Mr. Carter on the basis of his race in violation of the NJLAD.

97. The race harassment to which JCMUA subjected Mr. Carter was sufficiently severe or pervasive that a reasonable person would have deemed it to be hostile, abusive, intimidating, and/or offensive.

98. The harassment to which JCMUA subjected Mr. Carter would not have occurred but for Mr. Carter's race.

99. Although Mr. Carter complained about race discrimination to JCMUA, availing himself of any employer-provided avenue for handling race harassment, JCMUA failed to take appropriate remedial measures.

100. JCMUA failed to enforce its policies, if any, prohibiting race discrimination in the workplace.

101. JCMUA failed to make an unequivocal commitment from the top of the organization that its policies, if any, prohibiting race discrimination are not mere words, but backed by consistent practice.

102. JCMUA failed to protect Mr. Carter from race discrimination in the workplace and explicit and/or implicit race discrimination by JCMUA's agents and/or employees.

103. By and through the actions described herein, JCMUA subjected Mr. Carter to unlawful race discrimination.

104. The actions of the Defendants described herein, reflect and constitute a pattern and practice of race discrimination against Mr. Carter in violation of the NJLAD.

105. As a result of the Defendants' racial discrimination, Mr. Carter has suffered and will continue to suffer damages.

106. As a result of the Defendants' racial discrimination, Mr. Carter has suffered and will continue to suffer, emotional and psychological harm, stress, humiliation, mental anguish, and damage to his reputation.

107. The conduct described herein involved JCMUA's upper management and was egregious, willful, wanton, and in reckless disregard for Mr. Carter's rights for which punitive damages are appropriate.

**WHEREFORE** Plaintiff, Timothy Carter, demands judgment against Defendant, JCMUA, and seeks the following relief:

- (a) Back pay and benefits;
- (b) Front pay and benefits;
- (c) Compensatory damages including emotional distress damages;
- (d) Consequential damages;
- (e) Punitive damages;
- (f) Prejudgment interest and enhancements to off-set negative tax consequences;
- (g) Any and all attorneys' fees, expenses, and/or court costs, including but not limited to court costs, expert fees, and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to offset negative tax consequences and/or enhancements otherwise permitted by law); and
- (h) Such other relief as the Court may deem just and appropriate under the circumstances.

**SECOND CAUSE OF ACTION**  
**(AIDING AND ABETTING IN VIOLATION OF THE NJLAD)**

108. Plaintiffs hereby repeats and realleges all allegations set forth above as if set forth at length herein.

109. The NJLAD prohibits discrimination based on race, disability, and prohibits retaliation for engaging in protected activity.

110. The harassment to which Defendants subjected Mr. Carter was sufficiently severe or pervasive that a reasonable person would have deemed it to be hostile, abusive, intimidating, or offensive.

111. Defendants discriminated against Mr. Carter because of his race for the reasons set forth herein.

112. Defendants retaliated against Ms. Carter because she, as Mr. Carter's wife, was associated with Mr. Carter and Mr. Carter had engaged in the protected activity set forth herein.

113. Defendants were aware of their roles in the overall illegal, unlawful, and/or tortious activity at the time that they aided and/or abetted this discriminatory conduct.

114. Defendants' knowing and substantially assisted in this discriminatory conduct.

115. Defendants' above described actions constitute unlawful employment actions in violation of the NJLAD.

116. As a result of the Defendants' conduct as described herein in violation of the NJLAD Plaintiffs have suffered and will continue to suffer damages.

117. As a result of the Defendants' conduct as described herein, Plaintiffs have suffered and will continue to suffer emotional and psychological harm, stress, humiliation, mental anguish, and damage to her reputation.

118. The conduct involved JCMUA's upper management and was egregious, willful, wanton, and in reckless disregard for Plaintiffs' rights for which punitive damages are appropriate.

**WHEREFORE** Plaintiffs demand judgment against Executive Director Jose R. Cunha and Charles Schaadt, jointly and severally, and seeks the following relief:

- (a) Back pay and benefits;
- (b) Front pay and benefits;
- (c) Compensatory damages including emotional distress damages;
- (d) Consequential damages;
- (e) Punitive damages;
- (f) Prejudgment interest and enhancements to off-set negative tax consequences;
- (g) Any and all attorneys' fees, expenses, and/or court costs, including but not limited to court costs, expert fees, and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to offset negative tax consequences and/or enhancements otherwise permitted by law); and
- (h) Such other relief as the Court may deem just and appropriate under the circumstances.

**THIRD CAUSE OF ACTION**  
**(RETALIATION IN VIOLATION OF THE NJLAD)**

119. Plaintiffs hereby repeat and reallege all allegations set forth above as if set forth at length herein.

120. The NJLAD prohibits an employer from retaliating against a person because he or she opposed a practice or action that is unlawful under the NJLAD

121. Mr. Carter's opposition to severe and pervasive racial harassment while an employee of JCMUA constituted protected activity under the NJLAD.

122. Mr. Carter otherwise engaged in protected activity.

123. Ms. Carter is associated with Mr. Carter through her being his wife.

124. As a result of Mr. Carter's protected activity, JCMUA unlawfully retaliated against Ms. Carter in violation of the NJLAD including but not limited to denying Ms. Carter overtime and transferring her employment.

125. JCMUA failed to enforce its anti-retaliation policy, if any.

126. JCMUA failed to make an unequivocal commitment from the top of the organization that its anti-retaliation policy, if any, is not mere words, but backed by consistent practice.

127. JCMUA failed to protect Ms. Carter from retaliation in the workplace and explicit and/or implicit retaliation by JCMUA's agents and/or employees.

128. As a result of JCMUA's retaliation, Ms. Carter has and will continue to suffer damages.

129. As a result of JCMUA's retaliation, Ms. Carter suffered and will continue to suffer emotional and psychological harm, stress, humiliation, mental anguish, and damage to her reputation.

130. The conduct involved JCMUA's upper management and was egregious, willful, wanton, and in reckless disregard for Ms. Carter's rights for which punitive damages are appropriate.

**WHEREFORE** Plaintiff, Lori Carter, demands judgment against Defendant, JCMUA, and seeks the following relief:

- (a) Back pay and benefits;
- (b) Front pay and benefits;
- (c) Compensatory damages including emotional distress damages;

- (d) Consequential damages;
- (e) Punitive damages;
- (f) Prejudgment interest and enhancements to off-set negative tax consequences;
- (g) Any and all attorneys' fees, expenses, and/or court costs, including but not limited to court costs, expert fees, and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to offset negative tax consequences and/or enhancements otherwise permitted by law); and
- (h) Such other relief as the Court may deem just and appropriate under the circumstances.

**FOURTH CAUSE OF ACTION**  
**(NEW JERSEY WAGE AND HOUR LAW)**

131. Plaintiffs hereby repeat and reallege all allegations set forth above as if set forth at length herein.

132. JCMUA's conduct against Ms. Carter violates the New Jersey Wage and Hour Law, N.J.S.A. 34:11-56a, et seq. by failing to compensate Ms. Carter for all hours worked and not paying overtime when Ms. Carter worked over forty (40) hours per week.

133. As a result of JCMUA's conduct, Ms. Carter has suffered significant economic damages.

134. The conduct involved JCMUA's upper management and was egregious, willful, wanton, and in reckless disregard for Ms. Carter's rights for which punitive damages are appropriate.

**WHEREFORE** Plaintiff, Lori Carter, demands judgment against Defendant, JCMUA, and seeks the following relief:

- (a) Compensatory damages for loss of wages and benefits;
- (b) Treble damages;



- (c) Any and all attorneys' fees, expenses, and/or court costs, including but not limited to court costs, expert fees, and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to offset negative tax consequences and/or enhancements otherwise permitted by law); and
- (d) Such other relief as the Court may deem just and appropriate under the circumstances.

**FIFTH CAUSE OF ACTION**  
**(NEW JERSEY WAGE PAYMENT LAW)**

135. Plaintiffs hereby repeat and reallege all allegations set forth above as if set forth at length herein.

136. JCMUA's conduct violation the New Jersey Wage Payment Law, 34:11-4.1, et seq. because JCMUA illegally withheld monies from Ms. Carter.

137. As a result of JCMUA's conduct, Ms. Carter has suffered significant economic damages.

138. The conduct involved JCMUA's upper management and was egregious, willful, wanton, and in reckless disregard for Ms. Carter's rights for which punitive damages are appropriate.

**WHEREFORE** Plaintiff, Lori Carter, demands judgment against Defendant, JCMUA, and seeks the following relief:

- (a) Compensatory damages for loss of wages and benefits;
- (b) Treble damages;
- (c) Any and all attorneys' fees, expenses, and/or court costs, including but not limited to court costs, expert fees, and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to offset negative tax consequences and/or enhancements otherwise permitted by law); and

- (d) Such other relief as the Court may deem just and appropriate under the circumstances.

**MEREDITH MALATINO LAW LLC**

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Attorneys for Plaintiffs  
*Timothy Carter and Lori Carter*

By: /s/ Michael Malatino  
MICHAEL MALATINO

Dated: May 26, 2021

**JURY DEMAND**

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

**MEREDITH MALATINO LAW LLC**

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Attorneys for Plaintiffs  
*Timothy Carter and Lori Carter*

By: /s/ Michael Malatino  
MICHAEL MALATINO

Dated: May 26, 2021

**DESIGNATION OF TRIAL COUNSEL**

Plaintiff hereby designates Michael Malatino as trial counsel.

**MEREDITH MALATINO LAW LLC**  
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Attorneys for Plaintiffs  
*Timothy Carter and Lori Carter*

By: /s/ Michael Malatino  
MICHAEL MALATINO

Dated: May 26, 2021

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

The undersigned attorney for Plaintiff hereby certifies that the within matter is not the subject of any other action or arbitration proceeding pending or contemplated, nor are there any other parties known to Plaintiff who should be joined in this proceeding.

**MEREDITH MALATINO LAW LLC**  
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Attorneys for Plaintiffs  
*Timothy Carter and Lori Carter*

By: /s/ Michael Malatino  
MICHAEL MALATINO

Dated: May 26, 2021

**R. 1:38-7(c) CERTIFICATION**

Pursuant to R. 1:38-7(c), 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 R. 1:38-7(b).

**MEREDITH MALATINO LAW LLC**  
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Attorneys for Plaintiffs  
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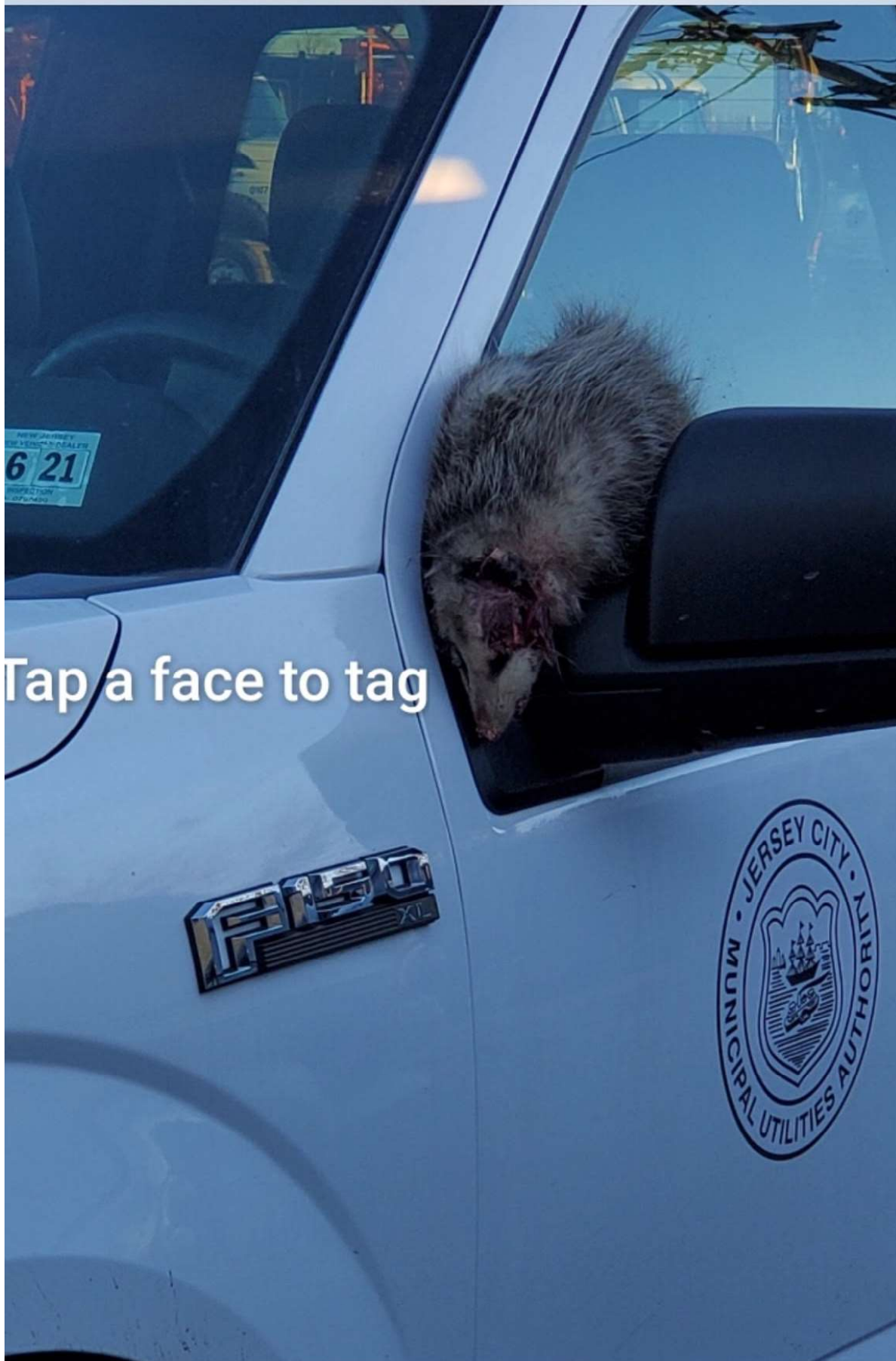
By: /s/ Michael Malatino  
MICHAEL MALATINO

Dated: May 26, 2021

# EXHIBIT A

Done

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Tap a face to tag

