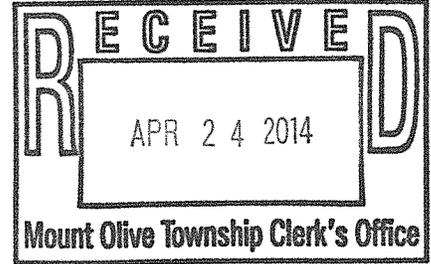


cc: Admin
Atty

James P. McHugh, III, Esq.
Attorney ID#: 034121989
McHugh & Brancato, LLP
421 West Main Street
Boonton, NJ, 07005
Telephone No.: 973-541-9229
Attorneys for Plaintiffs
File No.: PI-4723-JPM



DANIELLE LaLONDE)	SUPERIOR COURT OF NEW JERSEY
)	LAW DIVISION: MORRIS COUNTY
)	DOCKET NO: MRS-L-991-14
Plaintiff(s))	
)	Civil Action
v.)	
)	
MOUNT OLIVE POLICE)	
DEPARTMENT; TOWNSHIP OF)	
MOUNT OLIVE; MARIANNE L.)	SUMMONS
WURTEMBERG,)	
JOHN/JANE DOES 1-12 (said names)	
being fictitious) ABC CORP. 1-4 (said)	
names being fictitious) XYZ CORP. 1-4)	
(said names being fictitious) DEF AUTO)	
MAINTENANCE AND REPAIR 1-10)	
(said names being fictitious))	
Defendant(s))	

The State of New Jersey, to the Above Named Defendant(s):

Township of Mount Olive

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. The address of the deputy clerk of the Superior Court is Clerk of the Superior Court, at Washington & Court Streets, P.O. Box 910, Morristown, NJ 07963-0910. If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the [Clerk of the Superior Court] Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is provided.

Dated: April 21, 2014

Elisabeth Ann Strom, Esq.

Elisabeth Ann Strom, Esq.

Acting Clerk of the Superior Court

Name of Defendant to be served: **Township of Mount Olive**
Address of Defendant to be served: **204 Flanders-Drakestown Road**
Budd Lake, NJ 07828

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY 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 JAMES P. McHUGH, III, ESQ.		TELEPHONE NUMBER (973) 541-9229	
	FIRM NAME (if applicable) McHUGH & BRANCATO, LLP		COUNTY OF VENUE Morris	
	OFFICE ADDRESS 421 West Main Street Boonton, NJ 07005		DOCKET NUMBER (when available) MADL 991-14 DOCUMENT TYPE Complaint JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Danielle LaLonde, Plaintiff		CAPTION LaLonde v. Mt. Olive Township, et al		
CASE TYPE NUMBER (See reverse side for listing) 603Y	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) Morris County JIF <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
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 checked="" 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 checked="" type="checkbox"/> YES <input 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: 				

Side 2



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 ZOMETAXAREDA | 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

James P. McHugh, III, Esq.
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421 West Main Street
Boonton, NJ, 07005
Telephone No.: 973-541-9229
Attorneys for Plaintiffs
File No.: PI-4723-JPM

Copy Ref'd to
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CIVIL DIVISION
RECEIVED AND FILED
SUPERIOR COURT

DANIELLE LaLONDE)	SUPERIOR COURT OF NEW JERSEY
)	LAW DIVISION; MORRIS COUNTY
Plaintiff(s))	DOCKET NO: <i>MSL 991-14</i>
)	Civil Action
v.)	
)	
MOUNT OLIVE POLICE)	
DEPARTMENT; TOWNSHIP OF)	
MOUNT OLIVE; MARIANNE L.)	COMPLAINT AND JURY DEMAND
WURTEMBERG,)	
JOHN/JANE DOES 1-12 (said names)	
being fictitious) ABC CORP. 1-4 (said)	
names being fictitious) XYZ CORP. 1-4)	
(said names being fictitious) DEF AUTO)	
MAINTENANCE AND REPAIR 1-10)	
(said names being fictitious))	
Defendant(s))	

The plaintiff, DANIELLE LaLONDE, residing at 88 Oakwood Village, # 12, Flanders, NJ by way of complaint against the defendant(s) MOUNT OLIVE POLICE DEPARTMENT; TOWNSHIP OF MOUNT OLIVE; MARIANNE L. WURTEMBERG; JOHN/JANE DOES 1-12 (said names being fictitious); ABC CORP. 1-4 (said names being fictitious); XYZ CORP. 1-4 (said names being fictitious); DEF AUTO MAINTENANCE AND REPAIR 1-10 (said names being fictitious), says:

FIRST COUNT

1. On or about April 25, 2012 and at all times relevant hereto, the plaintiff, Danielle LaLonde was the owner and operator of a motor vehicle that was lawfully traveling on Flanders-Netcong Road in Mount Olive, New Jersey.
2. At all times relevant hereto, the defendant, MARIANNE L. WURTEMBERG and/or John or Jane Doe 1-2 (said names being fictitious) and/or ABC CORP. 1-2 was the operator of a motor vehicle owned by defendant, MOUNT OLIVE POLICE DEPARTMENT and/or TOWNSHIP OF MOUNT OLIVE and/or John/Jane Doe 3-4 (said names being fictitious) and/or ABC Corp. 1-2 (said names being fictitious) that was traveling on Route 206 in Mount Olive, New Jersey.
3. As the result of the negligence, carelessness and otherwise inattentive actions and/or inactions of the defendants aforesaid, a collision was caused to occur.
4. As a result of the aforementioned collision, the plaintiff, DANIELLE LaLONDE was caused to sustain serious, debilitating personal injuries that have caused her to experience great pain, limitations and discomfort and have and will continue to require medical treatment and attention into the future.
5. The appropriate tort claims notices were timely served upon all public entities in this action.

WHEREFORE, plaintiff, demands judgment against the defendants, jointly, severally and/or in the alternative together with interest, costs of suit and any all other damages deemed by the court to be equitable and fair.

SECOND COUNT

1. The plaintiff repeats and realleges the allegations of the First Count as though set forth herein in their entirety.
2. As a result of the severe personal injuries sustained by the plaintiff DANIELLE LaLONDE as aforesaid, plaintiff has suffered damage by the fact that she has incurred and will, in the future, incur costs and/or losses associated with medical treatment and/or monetary and/or financial losses including, but not limited to, property damages and lost wages all of which have resulted from the negligence, carelessness, inattentive and/or negligent actions and/or inactions of the defendants.

WHEREFORE, plaintiff, demands judgment against the defendants, jointly, severally and/or in the alternative together with interest, costs of suit and any all other damages deemed by the court to be equitable and fair.

THIRD COUNT

1. The plaintiff repeats and realleges the First and Second Counts as though set forth herein in their entirety.
2. At all times relevant hereto, the defendant, MARIANNE L. WURTEMBERG and/or John/Jane Does 1-2 was acting in the course of her employment or as an agent, servant, representative and/or employee of the defendant MOUNT OLIVE POLICE DEPARTMENT and/or TOWNSHIP OF MOUNT OLIVE, John or Jane Doe 3-4, ABC Corp. 1-2 and/or XYZ Corp. 1-2 (said names being fictitious).

3. As a result of the negligence, carelessness and otherwise inattentive actions and/or inactions of the defendants aforesaid while in the course of their employment with the defendants aforesaid were caused to collide with the vehicle being operated by the plaintiff, DANIELLE LaLONDE.
4. As a result of the aforementioned collision, the plaintiff DANIELLE LaLONDE was caused to sustain serious, debilitating personal injuries that have caused her to experience great pain, limitations and discomfort and have and will continue to require medical treatment and attention into the future.

WHEREFORE, plaintiff, demands judgment against the defendants, jointly, severally and/or in the alternative together with interest, costs of suit and any all other damages deemed by the court to be equitable and fair.

FOURTH COUNT

1. The plaintiff repeats and realleges the First, Second, and Third Counts as though set forth herein in their entirety.
2. At all times relevant hereto, the defendants, DEF Auto Maintenance and Repair 1-10 (said names being fictitious) and/or John/Jane Does 9-12 (said names being fictitious) were responsible for maintenance, repair and service of the vehicle(s) owned and/or operated by the defendants aforesaid.
3. At all times relevant hereto, the defendants, through their actions, and/or inactions, failed to properly repair, maintain and/or service the vehicle in question, thereby causing, and/or contributing to the cause of plaintiff's injuries.

4. At all times relevant hereto, the defendants, DEF Auto Maintenance and Repair 1-10 and/or John/Jane Does 9-12 failed to properly warn and/or advise the users of said vehicle of the dangerous conditions and/or hazardous conditions of said vehicle, thereby causing, and/or contributing to the cause, of plaintiff's injuries.

WHEREFORE, plaintiff, demands judgment against the defendants, jointly, severally and/or in the alternative together with interest, costs of suit and any all other damages deemed by the court to be equitable and fair.

JURY DEMAND

Please take notice that the plaintiffs demand a trial by jury on all issues.

DESIGNATION OF TRIAL COUNSEL

Please take notice that pursuant to R. 4-25-4, James P. McHugh, III, Esq. is hereby designated as trial counsel.

DEMAND FOR INTERROGATORIES

Please take notice that plaintiffs hereby demand of each defendant certified answers to Uniform Form C and C (1) Interrogatories within 60 days of receipt of this Complaint pursuant to Rule 4:17-1 et seq.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Please take notice that pursuant to Rule 4:10-2(b), demand is hereby made that the defendants disclose to plaintiff's attorney whether or not insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part of all of a judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide plaintiff's attorneys with true copies of those insurance agreement policies, including, but not limited to, any and declaration sheets. This demand shall include and cover not only primary coverage, but also any and all excess, catastrophe and umbrella policies.

CERTIFICATION

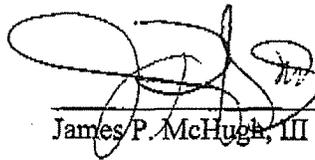
We hereby certify that the within pleading was served in the time limit of Rule 4:6-1, et seq.

CERTIFICATION PURSUANT TO R. 4:5-1

1. The matter in controversy is not the subject of a pending action or arbitration proceeding.
2. Another action or arbitration proceeding is contemplated as follows: None.
3. The following parties listed should be joined in this action. None.

McHUGH & BRANCATO

Attorney for Plaintiff



James P. McHugh, III

Dated: April 16, 2014