

THE MULLEN LAW FIRM
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Attorney for Plaintiff Raymond Lesniak

RAYMOND LESNIAK,

PLAINTIFF,

v.

PATCH.COM, PATCH INCORPORATED,
AND JOHN AND JANE DOES 1-10,

DEFENDANTS.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY

DOCKET No.:

CIVIL ACTION

**COMPLAINT AND
JURY DEMAND**

Plaintiff Raymond Lesniak, through his undersigned counsel, Corinne M. Mullen, by way of Complaint brings suit against Defendants, Patch.com, Patch, Incorporated, and John and Jane Does 1-10 in support thereof state as follows:

INTRODUCTION

1. Raymond Lesniak, is an adult individual residing at 530 Irvington Avenue, City of Elizabeth, County of Union, and State of New Jersey.

2. Mr. Lesniak is a former New Jersey legislator who served in the New Jersey State Assembly from 1979 to 1983 and in the State Senate from 1983 to 2018.

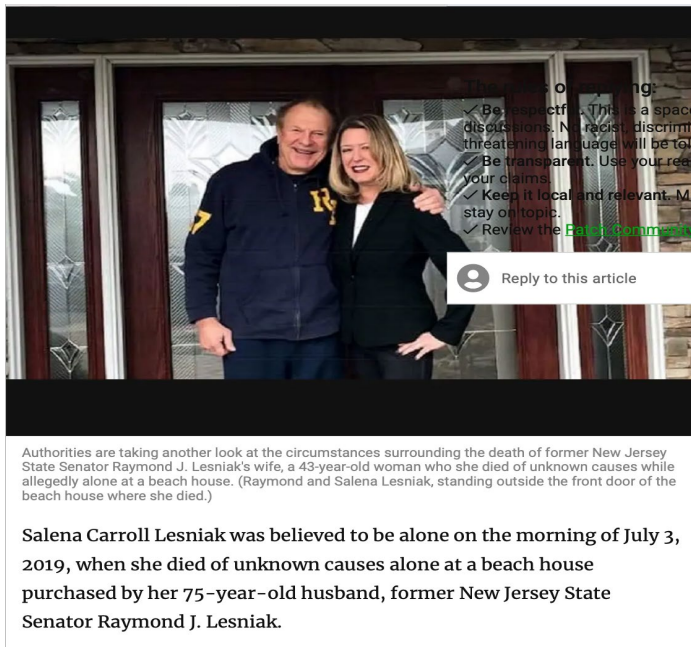
3. Mr. Lesniak had a loving twenty plus years relationship with his late wife, Salena Carroll. They lived at his home in Elizabeth, New Jersey and on weekends at his shore house in Brick Township, New Jersey. The two had been partners for 20 years before they married on September 3, 2018. An article in NJ Globe on July 29, 2019 titled "*Heartbroken, Lesniak returns to Trenton*" details the devastation Mr. Lesniak endured following the "unexpected loss of his wife

and best friend” (NJ Globe, 2019). “The death of Salena Carroll Lesniak hasn’t been easy on her husband, former State Sen. Raymond Lesniak (D-Elizabeth),” the article states. “Even talking about it, I’m breaking out in tears,” Lesniak told the New Jersey Globe. “I mean, it’s a real struggle. Salena was so much a part of my life. We did everything together. She drove me on a lot of my social agendas.” “We had so much to look forward to, and now that’s all gone.” Lesniak also told the NJ Globe that he and his wife married after 20 years because he wanted to make her happy, adding that the marriage filled him with joy as well.

4. When the COVID-19 pandemic hit the US in early 2020, Mr. Lesniak began writing his memoir for Rutgers University Press. In the Chapter on LGBT RIGHTS, Mr. Lesniak wrote, “It has been a healthy experience for me to think back at my life and career, recount a few stories, and offer a bit of insight through this memoir. But at this point in the story, there’s no avoiding sadness, because the issue I want to discuss—equal rights for the LGBTQ community—is entwined with memories of my late wife, Salena. She helped transform me from being a supporter of gay rights to being an advocate for them. It’s an important distinction that I saw in Salena’s dedication and passionate advocating for marriage equality. Salena died suddenly on July 3, 2019, at the age of forty-three, a victim of arteriosclerosis disease. There were no prior indications of any medical problems. Salena was at our shore house preparing to cook for the many guests we would be entertaining during the July 4th celebrations. She loved to cook and entertain. I had stayed in our Elizabeth home the night before, and as I turned the corner to the shore house the next morning, I saw police cars and an ambulance in our driveway. I went into a panic mode, jumped out of the car, and was told there was a young woman dead in the house. I freaked out, screaming and banging my head against the fence. The police chaplain who was there took me to an ambulance, and I was transported to a nearby hospital. I was administered Xanax intravenously.

The rest of the day and subsequent days are just one big blur...”

5. This is an action for, among other things, libel, defamation per se, false light/invasion of privacy, and emotional distress, arising from an article published online by Patch, an American local news and information platform, on January 29, 2022, headlined: “*Lesniak Minion’s Murder Plot Kindles Interest in Wife’s Death*”, allegedly authored by Patch Neighbor, Kendra McIntire. A true and accurate copy of the article is attached hereto as **Exhibit A** and copied below.



Although mystery surrounded the unexpected death of a woman in the prime of her life, police conducted only a cursory examination of the circumstances that ended the life of the chair of the New Jersey Civil Rights Commission.

Now, after the stunning revelation that Senator Lesniak's longtime political consultant engineered the contract killing of a Jersey City political operative nearly eight years ago, investigators are believed to be taking a new look into the 43-year-old woman's untimely demise.

Sean Caddle—the political consultant who managed Senator Lesniak's 2017 campaign for governor and collected millions of dollars through super PACs associated with the former lawmaker—admitted hiring two men to kill a Hudson County man in May 2014.

Caddle, 44, pleaded guilty by videoconference before U.S. District Judge John Michael Vazquez to conspiracy to commit murder for hire. Despite the gravity of that charge, the federal judge allowed Caddle to remain out on \$1 million unsecured bond with home detention, electronic monitoring and travel restrictions.

It might be terribly embarrassing if it turns out that law enforcement officials failed to recognize foul play in the death of this woman known for her passionate commitment for justice, equality, and human rights, but after the lawmaker's closest political associate admitted to arranging one murder, serious questions have to be asked.

"Salena was a class act and, along with Ray, a tireless advocate for countless New Jerseyans who needed a champion," said Gov. Phil Murphy, at the time. "If a life is to be measured by the positive impact it had on others, Salena led a full life, indeed. Tammy and I send our warmest thoughts to Senator Lesniak and all who held Salena dear."

Although they were known as a romantic couple for about 20 years, Salena and Raymond had been married for only one year when she mysteriously died. Is it possible that after seven decades of bachelorhood, the husband could not endure matrimonial stress?

It is believed that Caddle has been cooperating with federal prosecutors since last fall, so rumors are flying over who the political consultant

might betray to gather evidence sufficient to reduce his potential life sentence.

Senator Lesniak [reacted angrily](#) to a story published [on Gothamist by Nancy Solomon](#).

"Lesniak reportedly introduced Caddle to George Norcross, considered the most powerful political boss in New Jersey, in 2014 when Caddle was working on the Newark mayoral race, according to two associates of Caddle who requested anonymity because it would harm their work relationships," wrote Solomon. "Caddle also worked on an unsuccessful Atlantic City referendum in 2020 that attempted to take power away from the mayor and city council. And he ran a couple of super PACs that [went to great lengths](#) to shield its donors."

Caddle's confession has also raised new interest in the mysterious slaying of John Sheridan and his wife Joyce, whose bodies were found in the bedroom of their home in Somerset County. The decedents' son, Mark Sheridan, wrote to federal, state and county prosecutors asking them to determine if the knife found in the car that one of Caddle's hitmen was driving at the time of his arrest, could have been used one day earlier when the Somerset County couple was killed.

6. The article in question contains false and defamatory implications that Mr. Lesniak was responsible for the murder of his late wife, Salena Carroll. The article is replete with falsehoods and gross inaccurate statements of fact that constitute defamation per se under New Jersey decisional law.

7. The police are *not* investigating evidence of foul play in Ms. Carroll's death, as the article states as fact. Zero evidence has been put forth to suggest Ms. Carroll's death was a homicide, and certainly none exists implicating Plaintiff.

8. The police investigation of this matter concluded that the cause of death of Salena Carroll was atherosclerosis. The death certificate reflects this fact as well. A true and accurate copy

of Salena Carroll's death certificate is attached hereto as **Exhibit B** and copied below. Still, Defendants put forth completely false theories and alleged motives for our client murdering his wife, ranging everywhere from political affiliations to "matrimonial stress."

9. By reason of the foregoing, Plaintiff brings this action and seeks compensatory damages; punitive damages; pre- and post-judgment interest; attorneys' fees and costs of suit; and any and all other relief that this Court deems just and equitable.

PARTIES

A. Plaintiff

10. Plaintiff, Raymond Lesniak ("Plaintiff" or "Mr. Lesniak") is an individual and former New Jersey legislator, who served in the New Jersey State Assembly from 1979 to 1983 and in the State Senate from 1983 to 2018. He resides at 530 Irvington Avenue, Elizabeth, New Jersey 07208.

B. Defendants

11. Defendants, Patch.com and/or Patch Incorporated et al., is an American local news and information platform, primarily owned by Hale Global, LLC. Defendant Patch.com maintains its principal place of business at 134 East 29th Street, in the City of New York, County of New York and State of New York. Hale Global maintains its principal place of business at 139 East 63rd Street, City of New York, County of New York and State of New York.

VENUE

12. Venue is properly laid in Union County because Plaintiff is a resident of Union County and Defendants are doing business in Union County, New Jersey through Patch.com.

FACTS COMMON TO ALL COUNTS

COUNT 1

DEFAMATION - LIBEL

13. Plaintiff repeats each of the foregoing allegations as though fully set forth at length herein.

14. The Patch article, "*Lesniak Minion's Murder Plot Kindles Interest in Wife's Death*," was published on January 29, 2022 and allegedly written by Patch user, Kendra McIntire. Defendants' statements to the public, including implicating Plaintiff in committing murder, are false statements of fact and are intentionally and/or negligently misleading. Examples of these libelous statements are as follows:

Although mystery surrounded the unexpected death of a woman in the prime of her life, police conducted only a cursory examination of the circumstances that ended the life of the chair of the New Jersey Civil Rights Commission.

Now, after the stunning revelation that Senator Lesniak's long-time political consultant engineered the contract killing of a Jersey City political operative nearly eight years ago, investigators are believed to be taking a new look into the 43-year-old woman's untimely demise.

It might be terribly embarrassing if it turns out that law enforcement officials failed to recognize foul play in the death of this woman known for her passionate commitment for justice, equality, and human rights, but after the lawmaker's closest political associate admitted to arranging one murder, serious questions have to be asked.

Although they were known as a romantic couple for about 20 years, Salena and Raymond had been married for only one year when she mysteriously died. Is it possible that after seven decades of bachelorhood, the husband could not endure matrimonial stress?

It is believed that Caddle has been cooperating with federal prosecutors since last fall, so rumors are flying over who the political consultant might betray to gather evidence sufficient to reduce his potential life sentence.

15. Such statements are not only false, but defamatory in that such statements are blatantly injurious to the reputation of the Plaintiff.

16. In addition, several such statements constitute per se violations of common law defamation and libel. Defendants acted (a) with reckless disregard for the truth or falsity of statements, (b) knowing the statements were false or likely to be false, and (c) negligently in failing to ascertain the truth or falsity of the statement before communicating the statement.

17. Such statements were published widely on Patch's website and were made public to third parties as set forth above.

18. Such statements are injurious to Plaintiff's reputation and emotional wellbeing, and as a result, Defendants are liable to Plaintiff for damages, including compensatory and punitive damages.

WHEREFORE, Plaintiff, Raymond Lesniak hereby demands judgment against Defendants, Patch et al., as follows:

- A. Compensatory, consequential, and incidental damages;
- B. Punitive damages;
- C. Pre- and post-judgment interest;
- D. Attorneys' fees and costs of suit; and
- E. Such other relief as the Court deems equitable and just.

COUNT 2

DEFAMATION - SLANDER *PER SE*

19. Plaintiff repeats each of the foregoing allegations as though fully set forth at length herein.

20. Defendants published and/or republished false and defamatory statements concerning Plaintiff.

21. The aforementioned statements are defamatory per se because they falsely suggest that Plaintiff committed crimes or engaged in unlawful behavior.

22. The aforementioned statements were communicated to third parties via the Patch website.

23. Defendants knew the statements were false when they communicated them, communicated the statements with reckless disregard of their truth or falsity, and/or acted negligently in regards to the truth of the statements.

24. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered and will continue to suffer mental anguish, humiliation, shame, and impairment to his reputation because of Defendants' defamatory statements.

WHEREFORE, Plaintiff, Raymond Lesniak hereby demands judgment against Defendants, Patch et al., as follows:

- A. Compensatory, consequential, and incidental damages;
- B. Punitive damages;
- C. Pre- and post-judgment interest;
- D. Attorneys' fees and costs of suit; and
- E. Such other relief as the Court deems equitable and just.

COUNT 3

INVASION OF PRIVACY - FALSE LIGHT

25. Plaintiff repeats each of the foregoing allegations as though fully set forth at length herein.

26. As a result of their false statements and publications, Defendants have portrayed Mr. Lesniak before the public and his community in a false light, falsely suggesting that he engaged in criminal conduct (the murder of his late wife).

27. Defendants' publication constitutes major misrepresentations of Mr. Lesniak's character that would be highly offensive to a reasonable person.

28. Defendants had knowledge of and/or acted in reckless disregard as to the falsity of their representations and/or the false light in which Plaintiff would be placed as a result of Defendants' false statements and publication.

29. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered and will continue to suffer mental anguish, humiliation, shame, and impairment to his reputation because of Defendants' defamatory statements.

WHEREFORE, Plaintiff, Raymond Lesniak hereby demands judgment against Defendants, Patch et al., as follows:

- A. Compensatory, consequential, and incidental damages;
- B. Punitive damages;
- C. Pre- and post-judgment interest;
- D. Attorneys' fees and costs of suit; and
- E. Such other relief as the Court deems equitable and just.

COUNT 4

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

30. Plaintiff repeats each of the foregoing allegations as though fully set forth at length herein.

31. Defendants acted with actual malice and reckless disregard to the inevitability that

Plaintiff would suffer severe emotional distress as a direct and proximate result of being falsely implicated in the death of his late wife. Such accusations rise to the threshold of defamation per se, where language is found to be so harmful at face value that Plaintiff need not prove special damages. Defendants' unlawful conduct caused Plaintiff to suffer irreparable mental injury, thereby entitling Plaintiff to punitive damages in an amount to be determined at trial.

32. Defendants' aforementioned unlawful conduct was actuated by actual malice against Plaintiff and/or accompanied by wanton and willful disregard of the high probability of foreseeable harm to Plaintiff.

33. As a direct and proximate result of such improper conduct, Plaintiff has sustained and will continue to sustain damages.

WHEREFORE, Plaintiff, Raymond Lesniak hereby demands judgment against Defendants, Patch et al., as follows:

- A. Compensatory, consequential, and incidental damages;
- B. Punitive damages;
- C. Pre- and post-judgment interest;
- D. Attorneys' fees and costs of suit; and
- E. Such other relief as the Court deems equitable and just.

THE MULLEN LAW FIRM
Attorneys for Plaintiff, Raymond Lesniak

Dated: March 9, 2022

BY: /s/ Corinne M. Mullen
Corinne M. Mullen, Esq.

CERTIFICATION PURSUANT TOR. 4:5-1

In accordance with R. 4:5-1, I certify that based upon the information currently in my possession, the matter in controversy is not the subject of any other action pending in any Court, or of a pending arbitration proceeding, and that I know of no other person or persons at this time should be joined in this action.

THE MULLEN LAW FIRM
Attorneys for Plaintiff, Raymond Lesniak

Dated: March 9, 2022

BY: /s/ Corinne M. Mullen
Corinne M. Mullen, Esq.

CERTIFICATION OF COMPLIANCE WITH R. 1:38-7(C)

To the best of my knowledge, information and belief, 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(C).

THE MULLEN LAW FIRM
Attorneys for Plaintiff, Raymond Lesniak

Dated: March 9, 2022

BY: /s/ Corinne M. Mullen
Corinne M. Mullen, Esq.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Corinne M. Mullen, Esq. is hereby designated as trial counsel on behalf of Plaintiff.

THE MULLEN LAW FIRM
Attorneys for Plaintiff, Raymond Lesniak

Dated: March 9, 2022

BY: /s/ Corinne M. Mullen
Corinne M. Mullen, Esq.

JURY DEMAND

Plaintiff demands trial by jury for all issues so triable.

THE MULLEN LAW FIRM
Attorneys for Plaintiff, Raymond Lesniak

Dated: March 9, 2022

BY: /s/ Corinne M. Mullen
Corinne M. Mullen, Esq.

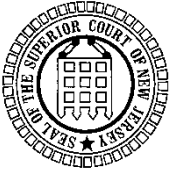

 <h2 style="text-align: center;">Civil Case Information Statement (CIS)</h2> <p style="text-align: center;">Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</p>		For Use by Clerk's Office Only			
		Attorney/Pro Se Name Corinne M. Mullen, Esq.		Telephone Number 201-420-1911	County of Venue Union
		Firm Name (if applicable) The Mullen Law Firm		Docket Number (when available)	
		Office Address 110a Meadowlands Parkway, Suite 101 Secaucus, NJ 07094		Document Type Complaint	Jury Demand <input type="checkbox"/> Yes <input type="checkbox"/> No
		Name of Party (e.g., John Doe, Plaintiff) Raymond Lesniak, Plaintiff		Caption Raymond Lesniak, Plaintiff v. Patch.com, Patch Incorporated, and John and Jane Does 1-10	
Case Type Number (See reverse side for listing) 609	Are sexual abuse claims alleged? <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 <i>N.J.S.A. 2A:53A-27</i> 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 checked="" 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 checked="" 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</i> 1:38-7(b).					
Attorney Signature: Corinne M. Mullen					

EXHIBIT A



Sign up

Flemington, NJ

< Lesniak minion's murder plot kindle death

News Feed

Neighbor Posts

Mark

Neighbor News

Lesniak minion's murder plot kindle wife's death

Salena Lesniak was only 43 years old on July 3, 201... causes, supposedly while alone at a beach house.



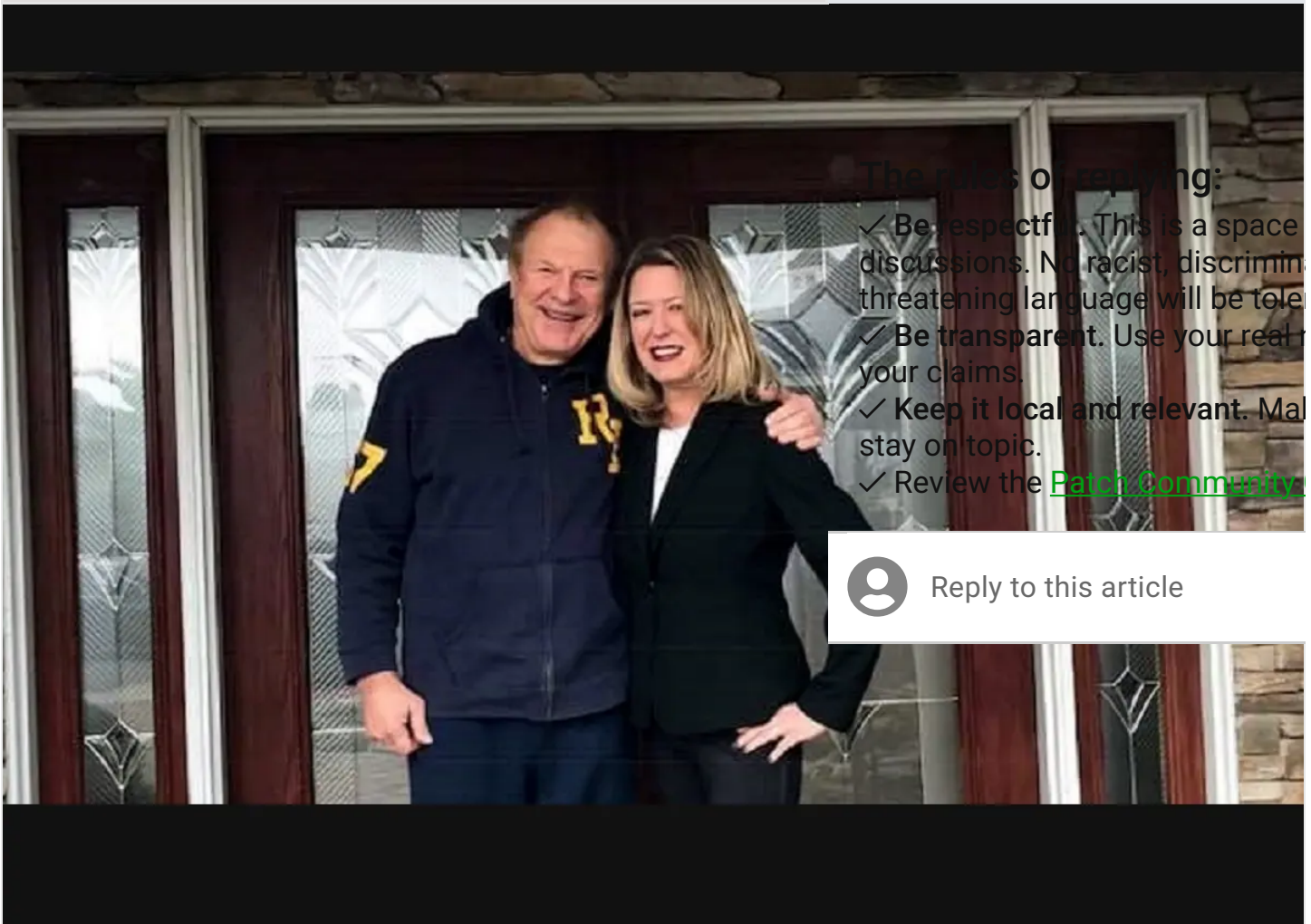
Kendra McIntire, Neighbor

Posted Sat, Jan 29, 2022 at 11:23 pm ET Updated Sat, Jan 29, 2022 at 11:34 pm ET

Toenail Clippers For

Open

Seniors



Authorities are taking another look at the circumstances surrounding the death of former New Jersey State Senator Raymond J. Lesniak's wife, a 43-year-old woman who she died of unknown causes while allegedly alone at a beach house. (Raymond and Salena Lesniak, standing outside the front door of the beach house where she died.)

Salena Carroll Lesniak was believed to be alone on the morning of July 3, 2019, when she died of unknown causes alone at a beach house purchased by her 75-year-old husband, former New Jersey State Senator Raymond J. Lesniak.



Although mystery surrounded the unexpected death of a woman in the prime of her life, police conducted only a cursory examination of the circumstances that ended the life of the chair of the New Jersey Civil Rights Commission.

Now, after the stunning revelation that Senator Lesniak's longtime political consultant engineered the contract killing of a Jersey City political operative nearly eight years ago, investigators are believed to be taking a new look into the 43-year-old woman's untimely demise.

Find out what's happening in Flemington with free, real-time updates from Patch.

Your email address

Let's go!

Sean Caddle—the political consultant who managed Senator Lesniak's 2017 campaign for governor and collected millions of dollars through super PACs associated with the former lawmaker—admitted hiring two

men to kill a Hudson County man in May 2014.

Caddle, 44, pleaded guilty by videoconference before U.S. District Judge John Michael Vazquez to conspiracy to commit murder for hire. Despite the gravity of that charge, the federal judge allowed Caddle to remain out on \$1 million unsecured bond with home detention, electronic monitoring and travel restrictions.



Salena Lesniak spent 15 years working closely with law enforcement, public safety, and emergency management officials as head of the Bureau of Domestic Preparedness in Union County.

"She was a kind and intelligent young woman who will be greatly missed," said Union County Public Safety Director Andrew Moran.



It might be terribly embarrassing if it turns out that law enforcement officials failed to recognize foul play in the death of this woman known for her passionate commitment for justice, equality, and human rights, but after the lawmaker's closest political associate admitted to arranging one murder, serious questions have to be asked.

"Salena was a class act and, along with Ray, a tireless advocate for countless New Jerseyans who needed a champion," said Gov. Phil Murphy, at the time. "If a life is to be measured by the positive impact it had on others, Salena led a full life, indeed. Tammy and I send our warmest thoughts to Senator Lesniak and all who held Salena dear."

Although they were known as a romantic couple for about 20 years, Salena and Raymond had been married for only one year when she mysteriously died. Is it possible that after seven decades of bachelorhood, the husband could not endure matrimonial stress?

It is believed that Caddle has been cooperating with federal prosecutors since last fall, so rumors are flying over who the political consultant

might betray to gather evidence sufficient to reduce his potential life sentence.

Senator Lesniak [reacted angrily](#) to a story published [on Gothamist by Nancy Solomon](#).

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Caddle's confession has also raised new interest in the mysterious slaying of John Sheridan and his wife Joyce, whose bodies were found in the bedroom of their home in Somerset County. The decedents' son, Mark Sheridan, wrote to federal, state and county prosecutors asking them to determine if the knife found in the car that one of Caddle's hitmen was driving at the time of his arrest, could have been used one day earlier when the Somerset County couple was killed.

EXHIBIT B

STATE OF NEW JERSEY

B0011521655

The amendment below refers to the record on the preceding page with the same State File Number that has an (x) in the 'Record Contains Amendment' box.

CERTIFICATE OF DEATH - AMENDMENT RECORD STATE FILE NUMBER
20190037453

Name of Decedent (First, Middle, Last, Suffix) **Salena P Lesniak** Date of Death **07/03/2019** Status **Accepted** Date Amended **08/27/2019** Part 1 of 1

New Jersey Department of Health
Office of Vital Statistics and Registry
PO Box 378, Trenton, NJ 08625-0378

AMENDMENT TO BIRTH FETAL DEATH REMARRIAGE REAFFIRMATION OF CIVIL UNION
NJ VITAL RECORD OF: DEATH MARRIAGE CIVIL UNION DOMESTIC PARTNERSHIP

REGISTRATION AS IT APPEARS ON THE SUBJECT RECORD: **SALENA P LESNIAK**

SECTION 1
Name (or Names, in the case of Marriage, Remarriage, Civil Union, Reaffirmation of Civil Union or Domestic Partnership) **SALENA P LESNIAK**
Date of Death **07 / 03 / 2019** Place of Death **OCEAN** Brick Township

SECTION 2
Field to be Amended: **36A** PENDING FURTHER STUDIES **ATHEROSCLEROTIC CARDIOVASCULAR DISEASE**
46 PENDING INVESTIGATION **NATURAL**

SECTION 3
Subscribed and sworn to before me at _____
On _____ day of _____, 20____.

Signature: **DR. DONATO SANTANGELO, III** Date: **08-21-2019**
Address: **P.O. BOX 2191, TOMS RIVER, NJ 08754-2191** Relationship to Individual on Vital Record: **MEDICAL EXAMINER**

Signature: **PATRICIA DE STEFANO** Date: **08-21-2019**
Address: **P.O. BOX 2191, TOMS RIVER, NJ 08754-2191** Relationship to Individual on Vital Record: **M.B. STAFF**

SECTION 4
Declaration prescribed to establish the validity of the amended information reported in Section 2:
NJVS MLG AUG 27 2019

FOR OFFICIAL USE ONLY - DO NOT WRITE BELOW THIS LINE
Secondary Item(s) Approval Date: _____ Parents Given Option to Change Child's Last Name? Yes No N/A

THIS DOCUMENT CONTAINS A UNIQUE STATE OF NJ WATERMARK HOLD AT LIGHT TO VERIFY

THIS DOCUMENT CONTAINS A UNIQUE STATE OF NJ WATERMARK HOLD AT LIGHT TO VERIFY

DATE ISSUED: February 01, 2022

ISSUED BY:
Brick Township, Brick, NJ 08723

This is to certify that the above is correctly copied from a record on file in my office.

Lynette Iannarone, Local Registrar

Certified copy not valid unless the raised Great Seal of the State of New Jersey or the seal of the issuing municipality or county, is affixed hereon.

Vincent T. Arisi
Vincent T. Arisi
State Registrar
Office of Vital Statistics and Registry



REG-42B
JUN 14



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	506 PIP Coverage
175 Forfeiture	510 UM or UIM Claim (coverage issues only)
302 Tenancy	511 Action on Negotiable Instrument
399 Real Property (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)	512 Lemon Law
502 Book Account (debt collection matters only)	801 Summary Action
505 Other Insurance Claim (including declaratory judgment actions)	802 Open Public Records Act (summary action)
	999 Other (briefly describe nature of action)

Track II - 300 days discovery

305 Construction	603Y Auto Negligence – Personal Injury (verbal threshold)
509 Employment (other than Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (LAD))	605 Personal Injury
599 Contract/Commercial Transaction	610 Auto Negligence – Property Damage
603N Auto Negligence – Personal Injury (non-verbal threshold)	621 UM or UIM Claim (includes bodily injury)
	699 Tort – Other

Track III - 450 days discovery

005 Civil Rights	608 Toxic Tort
301 Condemnation	609 Defamation
602 Assault and Battery	616 Whistleblower / Conscientious Employee Protection Act (CEPA) Cases
604 Medical Malpractice	617 Inverse Condemnation
606 Product Liability	618 Law Against Discrimination (LAD) Cases
607 Professional Malpractice	

Track IV - Active Case Management by Individual Judge / 450 days discovery

156 Environmental/Environmental Coverage Litigation	514 Insurance Fraud
303 Mt. Laurel	620 False Claims Act
508 Complex Commercial	701 Actions in Lieu of Prerogative Writs
513 Complex Construction	

Multicounty Litigation (Track IV)

271 Accutane/Isotretinoin	601 Asbestos
274 Risperdal/Seroquel/Zyprexa	623 Propecia
281 Bristol-Myers Squibb Environmental	624 Stryker LFIT CoCr V40 Femoral Heads
282 Fosamax	625 Firefighter Hearing Loss Litigation
285 Stryker Trident Hip Implants	626 Abilify
286 Levaquin	627 Physiomesh Flexible Composite Mesh
289 Reglan	628 Taxotere/Docetaxel
291 Pelvic Mesh/Gynecare	629 Zostavax
292 Pelvic Mesh/Bard	630 Proceed Mesh/Patch
293 DePuy ASR Hip Implant Litigation	631 Proton-Pump Inhibitors
295 AlloDerm Regenerative Tissue Matrix	632 HealthPlus Surgery Center
296 Stryker Rejuvenate/ABG II Modular Hip Stem Components	633 Prolene Hernia System Mesh
297 Mirena Contraceptive Device	634 Allergan Biocell Textured Breast Implants
299 Olmesartan Medoxomil Medications/Benicar	
300 Talc-Based Body Powders	

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 Consumer Fraud