

JURY
R-699

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Superior Court of New Jersey

FEB 23 2017

CIVIL CASE MANAGEMENT
UNION COUNTY

2/23

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OVP _____

LAKISHA McCANTIS, as guardian ad litem
of INDIA AYALA, an infant, and LAKISHA
MCCANTIS, individually,

Superior Court of New Jersey
Law Division, Union County
Docket No. : UNN-L-

UNN-L-0795-17
Civil Action

-VS-

THE LIGHTBRIDGE ACADEMY, ERICA
KENNY, CHARESE WHITE, and JOHN
AND MARY DOES 1-10 (the fictitious names
of persons who were employed by or worked
at THE LIGHTBRIDGE ACADEMY who
were involved in staging fights among the
individual youths in daycare there, the present
identities of whom are unknown),

COMPLAINT

Defendants.

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Plaintiffs, LAKISHA McCANTIS, as guardian ad litem of INDIA AYALA, an infant,
and LAKISHA MCCANTIS, individually, by way of their Complaint against Defendants, allege
and say:

FIRST COUNT

1. Plaintiff, LAKISHA McCANTIS, is the natural mother and guardian of INDIA AYALA, an infant, who reside in Union County, New Jersey.
2. During the summer of 2015, and at other times prior and subsequent thereto, infant plaintiff, INDIA AYALA, was in the care, custody, and control of THE LIGHTBRIDGE ACADEMY, for the purposes of providing daycare services on her behalf.

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3. Employed by the defendants at that time, in addition to fictitious defendants named and described here and above, were ERICA KENNY and CHARESE WHITE, who were employed in the capacity of Assistant and Lead Teachers.

4. Defendant, THE LIGHTBRIDGE ACADEMY, failed to properly screen, hire, investigate, monitor, maintain, supervise said employees, and failed to conduct reasonable background investigation as to and as relates to the history of said defendants and employees, both named and fictitious, failed to properly supervise, failed to properly have the necessary number of employees present, failed to comply with their own rules and regulations, failed to provide overall supervision, failed to comply with the regulations of the State of New Jersey, and failed to maintain the proper teacher/assistant teacher/student ratio as required by law. Defendant, THE LIGHTBRIDGE ACADEMY, was otherwise negligent and careless in the maintenance and running of said academy for daycare purposes.

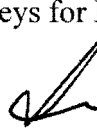
5. Defendant, THE LIGHTBRIDGE ACADEMY, similarly failed to implement and maintain proper control, supervision, and failed to properly provide care, custody, and control of infant plaintiff, and others similarly situated, and failed to maintain adequate staff and sufficient staff as required by law and for purposes associated with their activities in providing daycare.

6. Defendants WHITE and KENNY, together with the fictitious defendants, improperly, negligently, carelessly, intentionally, and volitionally encouraged those youngsters in daycare to stage and engage in actual physical combat known as a “fight club” for their own gratification which was videoed for the same gratifying purposes. Defendant, THE LIGHTBRIDGE ACADEMY, knew or should have known about these activities, and failed to prevent and take safeguards to prevent and cause same to cease.

7. As a result of the activities of the defendants herein, and as herein described above, the infant plaintiff suffered severe psychological, emotional, mental, and physical disability injury which required great medical care and expense and has left the infant plaintiff with physical, mental, emotional, and psychic injuries that are permanent in nature and will require medical costs and treatment well into the future. The plaintiff, LAKISHA McCANTIS, suffered emotional stress, medical expenses, and physical injury as a result of the acts of defendants as aforesaid.

WHEREFORE, Plaintiffs demand judgment against the defendants for compensatory and punitive damages, together with all other relief as may be deemed appropriate by the court.

Lane M. Ferdinand
Attorneys for Plaintiff

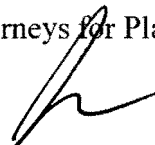


Lane M. Ferdinand

JURY DEMAND

Plaintiff demands trial by jury of six on all issues herein.

Lane M. Ferdinand
Attorneys for Plaintiff



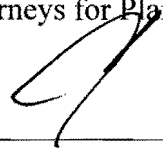
Lane M. Ferdinand

CERTIFICATION

We hereby certify that the foregoing pleading has been filed within the time period set by the applicable Court Rules and extensions thereof.

Pursuant to R. 4:5-1 we hereby certify that we have no knowledge of any other pending actions or proceedings concerning the subject matter of this action. It is not anticipated at this time that there is any other party who should be joined in this action.

Lane M. Ferdinand
Attorneys for Plaintiff



Lane M. Ferdinand

DEMAND FOR INTERROGATORIES

PLEASE TAKE NOTICE that pursuant to R. 4:17-1, demand is made of the defendant(s) to provide certified answers to Uniform Court Interrogatories Form C within the time prescribed by the Rules of the Court.

PLEASE TAKE NOTICE that pursuant to R. 4:17-1, demand is made of the Co-Defendant(s) to provide certified answers to Uniform Court Interrogatories Form C within the time prescribed by the Rules of the Court.

Lane M. Ferdinand
Attorneys for Plaintiff



Lane M. Ferdinand

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to R. 4:25-3, please designate Lane M.

Ferdinand, Esq. on behalf of the Law Offices of Lane M. Ferdinand as Trial Counsel in the above captioned litigation.

Lane M. Ferdinand
Attorneys for Plaintiff



Lane M. Ferdinand