

LAW OFFICE OF ROBERT A. TANDY, LLC

Corporate Center
 50 Tice Boulevard, Suite 250
 Woodcliff Lake, New Jersey 07677
 (201) 474-7103
 Attorneys for Plaintiff
 ATTORNEY ID # 028031999

<p>BRYAN FERLANTI</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>BOROUGH OF FAIR LAWN; BOROUGH OF FAIR LAWN DEPARTMENT OF PUBLIC WORKS; JAMES VAN KRUININGEN; ALAN NEGGIA; JOSEPH RAYMOND; XYZ CORP. INC. (1-10); JOHN DOES (1-10) and JANE DOES (1-10)</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: BERGEN COUNTY</p> <p style="text-align: center;">Docket No.:</p> <p style="text-align: center;">CIVIL ACTION</p> <p style="text-align: center;">COMPLAINT, JURY DEMAND, DESIGNATION OF TRIAL COUNSEL</p>
---	---

Plaintiff, Bryan Ferlanti (“Plaintiff”), by his attorneys, the Law Office of Robert A. Tandy, LLC., by way of Complaint against the Defendants, BOROUGH OF FAIR LAWN; BOROUGH OF FAIR LAWN DEPARTMENT OF PUBLIC WORKS; JAMES VAN KRUININGEN; ALAN NEGGIA; JOSEPH RAYMOND; XYZ CORP. INC. (1-10); JOHN DOES (1-10) and JANE DOES (1-10), alleges as follows:

NATURE OF ACTION AND VENUE

1. This is an action pursuant to the New Jersey Law Against Discrimination (“NJLAD”), *N.J.S.A.* §10:5-1 *et seq.*, to remedy unlawful retaliation for engaging in protected activity and discrimination on the basis of handicap.

2. Venue lies in the County of Bergen, State of New Jersey pursuant to R. 4:3-2(a).

PARTIES

3. Plaintiff is an “employee” of Defendants Borough of Fair Lawn and Borough of Fair Lawn Department of Public Works within the meaning of NJLAD §10:5-5(f)

4. Defendants Borough of Fair Lawn and Borough of Fair Lawn Department of Public Works is/are Plaintiff’s “employer(s)” within the meaning of NJLAD §10:5-5(e).

5. Defendant James Van Kruiningen was a supervisory individual employed by Defendants Borough of Fair Lawn and/or Borough of Fair Lawn Department of Public Works.

6. Defendant Alan Neggia was a supervisory individual employed by Defendants Borough of Fair Lawn and/or Borough of Fair Lawn Department of Public Works.

7. Defendant Joseph Raymond was an “Acting” supervisory individual employed by Defendants Borough of Fair Lawn and/or Borough of Fair Lawn Department of Public Works.

8. At all times relevant herein, XYZ Corp., Inc. (1-10) was/were Plaintiff’s employer(s) within the meaning of NJLAD §10:5-5(e).

9. At all times relevant herein, John Does (1-10) and Jane Does (1-10) were supervisory individuals employed by Defendants Borough of Fair Lawn and/or Borough of Fair Lawn Department of Public Works.

STATEMENT OF FACTS

10. In or around 2000, Plaintiff commenced employment with the Borough of Fair Lawn Department of Public Works as a Laborer in the Sanitation Department.

11. In or around 2015, while Plaintiff was operating a sanitation truck, a co-worker fell of the back of the truck, hit his head, and died.

12. In or around 2015, Plaintiff was assigned to work at the Fair Lawn Community Center as a Senior Maintenance Repairman.

13. In or around 2015, Plaintiff was diagnosed as suffering from Post-Traumatic Stress Disorder (“PTSD”) as a result of his co-workers repeatedly calling Plaintiff “Killer.”

14. Plaintiff repeatedly complained to management that he was being harassed and subject to a hostile work environment by his co-workers.

15. Plaintiff advised his supervisors at that time that he was being treated by a mental health professional relating to suffering from and being treated for suffering from PTSD; and Plaintiff specifically advised supervisors that he could not handle the day to day stress and confrontations associated with his co-workers harassing him at work.

16. On or about September 21, 2016, Plaintiff was transferred to the Department of Public Works, Water Division reporting to Raymond Turton, Supervisor of Water Distribution.

17. Plaintiff was directed to report to the Water Department on Cadmus Place for his work assignments.

18. On or about April 3, 2018, at approximately 3:28 pm, Plaintiff attempted to “punch out” on the time clock in the Water Department before leaving work for the day.

19. When Plaintiff attempted to “punch out,” Joseph Raymond, who identified himself as the Assistant Supervisor and Senior Water Treatment Plant Operator, physically blocked and prevented Plaintiff from “punching out” of work.

20. At that time, Mr. Raymond physically blocked Plaintiff from the time clock.

21. Plaintiff, attempting to avoid a physical altercation and verbal confrontation, left the building without punching out of work.

22. Plaintiff immediately texted his boss, Raymond Turton, and advised him that Mr. Raymond prevented him from punching out of work for the day.

23. Mr. Turton did not respond.

24. The incident triggered Plaintiff's PTSD.

25. Prior to April 3, 2018, Mr. Turton did not have a problem with Plaintiff punching out of work just prior to 3:30 pm as Plaintiff routinely punched in to work prior to his official start time.

26. On or about April 16, 2018, Plaintiff again attempted to punch out of work at 3:28 pm.

27. Once again, Defendant Raymond, who knew or should have known Plaintiff suffered from and/or treated with mental health professionals for his diagnosis of PTSD, physically prevented Plaintiff from punching out of work.

28. When Plaintiff walked out of the building to his car, Defendant Raymond pulled his vehicle in front of Plaintiff's car preventing him from driving out of his parking spot.

29. Defendant Raymond then exited his vehicle and went back inside the building.

30. Plaintiff went back into the building to get keys to his work vehicle so he could move the work vehicle and get his personal vehicle out of the parking spot.

31. Plaintiff immediately texted Mr. Turton about the incident.

32. Defendant Raymond threatened Plaintiff that if he complained about the incident he would make sure that Plaintiff would be terminated.

33. On or about April 17, 2018, Plaintiff received a Counseling Action Plan relating to leaving work at 3:28 pm, despite having authority from his direct supervisor to do same.

34. Plaintiff signed the original Counseling Action Plan.

35. On or about April 19, 2018, Plaintiff reviewed the video surveillance of the April 17, 2018 incident and complained to Defendant Neggia that Defendant Raymond was creating a hostile work environment.

36. On or about April 19, 2018, Plaintiff filed an Employee Complaint Form against Joseph Raymond and Al Neggia.

37. In the fact of Plaintiff's April 20, 2018, Plaintiff was directed to report to Borough Hall for his assignments and not the Water Department.

38. Plaintiff was the only water department employee who was required to report to Borough Hall; and, to this day, still is the only Water Department employee who reports to Borough Hall for his work assignments.

39. On April 20, 2018, the City Manager sent a letter to Plaintiff advising that Plaintiff's complaints would be investigated.

40. On or about April 24, 2018, Plaintiff requested to be moved back to the Water Department out of Borough Hall because he believed he was being retaliated against for filing a complaint.

41. On May 4, 2018, Plaintiff's grievance was denied.

42. On or about May 7, 2018, Plaintiff submitted a response to the May 4 denial of the grievance.

43. On or about May 14, 2018, Plaintiff submitted an Employee Complaint Form against Al Neggia for creating a "hostile work environment-favoring one employee over another...."

44. On or about May 15, 2018, the Borough Manager sent Plaintiff correspondence advising his complaints were being investigated and directed him to address all future issues and grievances to the Borough's Labor Counsel.

45. In or around the middle of May 2018, Plaintiff and his then attorney met with the Borough Manager and the Borough of Fair Lawn's Labor Counsel.

46. Shortly after the meeting, one of the charges against Plaintiff was removed from his April 17, 2018 Counseling Action Plan.

47. On or about May 16, 2018, Plaintiff went to the Borough Manager's office to review his personnel file.

48. Upon reviewing his file, Plaintiff discovered that his April 17, 2018 write-up was not in his file.

49. Michelle Coles advised Plaintiff that the disciplinary action file was maintained in a different file and Plaintiff was not allowed to see his disciplinary action file.

50. On or about May 23, 2018, after having complained directly to Civil Service, Plaintiff was afforded an opportunity to review his disciplinary action file at Borough Hall.

51. On or about June 9, 2018, Raymond Turton accused Plaintiff that he was behind in his work and that all books had to be completed by June 13 for billing.

52. Plaintiff advised Mr. Turton that he was unaware that the billing was being conducted on June 13, but assured Mr. Turton that he would have all books completed for billing.

53. On or about June 11, Plaintiff discovered that his work had been completed by two employees who were called in on overtime to discuss.

54. When Plaintiff questioned Mr. Turton, Mr. Turton responded that he had no idea why the work was completed it came from management.

55. On or about July 7, 2018, Plaintiff's personal television, which was in the break room, had been removed from the wall. Mr. Brett Hahn advised Plaintiff that Al Neggia instructed Mr. Hahn to remove Plaintiff's television from the wall and get it out of the building as none of Plaintiff's belongings were allowed in the building. Mr. Hahn then placed the television in a storage closet.

56. On or about July 10, 2018, Plaintiff reported to work and tried to enter the Buildings and Ground office. Although the door was locked, there were two employees - - Brett Hahn and Walter Demorski – present in the office. They refused to open the door for Plaintiff.

57. On or about July 18, 2018, Plaintiff asked his manager why he had been locked out of the office.

58. Plaintiff's manager advised him that the door would be opened in the future for him.

59. Plaintiff thereafter complained to Nick Magliorelli that he was still locked out of the office.

60. Mr. Magliorelli then went to the office with Plaintiff and the door was locked. When Mr. Magliorelli knocked on the door and identified himself, Mr. Hahn opened the door and directed Mr. Hahn to leave the door unlocked and opened.

61. At the end of the day, the door was locked again and Mr. Magliorelli advised Plaintiff that the door needed to be locked.

62. On or about July 19, Plaintiff reported for work and the door was open but no other employees were in the office.

63. On or about July 24, 2018, Plaintiff received a call from his supervisor to report to Borough Hall immediately.

64. Plaintiff reported to Borough Hall and was asked to have a seat. While seated, five Police Officers arrived, handed Plaintiff an envelope advising Plaintiff that he was being placed on Administrative Leave by Defendant James Van Kruiningen.

65. On or about July 24, 2018, Defendant James Van Kruiningen expressly provided Plaintiff with correspondence relating to his Administrative Leave.

66. Specifically, Defendant James Van Kruiningen also expressly provided “During the administrative leave, you are not to enter any Municipal building and/or facility.”

67. As a direct result of Defendants placing Plaintiff on Administrative Leave, Plaintiff was thereby prevented, restricted and/or otherwise prohibited from utilizing the Municipal pool facilities in the summer of 2018.

68. As a direct result of Defendants placing Plaintiff on Administrative Leave, Plaintiff was thereby prevented, restricted and/or otherwise prohibited from attending his son’s basketball games at the Borough of Fair Lawn Community Center.

69. As a direct result of Defendants placing Plaintiff on Administrative Leave, Plaintiff was thereby prevented, restricted and/or otherwise prohibited from taking his children to the Borough of Fair Lawn Library.

70. As a direct result of Defendants placing Plaintiff on Administrative Leave, Plaintiff was thereby prevented, restricted and/or otherwise prohibited from attending his sons’ respective baseball games and practice at all Municipal fields.

71. As a direct result of Defendants placing Plaintiff on Administrative Leave, Plaintiff was thereby prevented, restricted and/or otherwise prohibited from going to playgrounds with his children.

72. On or about July 30, 2018, Plaintiff received correspondence from the Borough Manager advising him that he needed to attend a “Fitness for Duty” examination to determine if he could “safely perform the full duties that are required” of his job so that “we are assured that your safety and well-being are protected as well as that of your co-workers.”

73. On or about August 16, 2018 and September 5, 2018, Plaintiff met with Dr. Rachel Safron in connection with the Fitness for Duty Examination.

74. On or about October 16, 2018, Plaintiff was found Fit for Duty.

75. On or about November 13, 2018, Plaintiff’s first day back to work, he was immediately subjected to retaliatory conduct by his co-workers.

76. Plaintiff was once again locked out of the break room by his co-workers and his Town vehicle was vandalized, specifically, the door handle was broken off.

77. Plaintiff immediately complained and his complaints were not taken seriously.

78. On or about November 13, 2018, in attempting to answer Plaintiff’s complaints, the Borough Labor Attorney and Plaintiff’s attorney engaged in the following email exchange:

(Labor Counsel wrote) Good morning, Mr. Tandy.

As you are aware, your client, Bryan Ferlanti reported back to work with the Borough of Fair Lawn this morning. In the short time he has been back he has sent the Borough Manager at least two emails.

The emails contain a number of factual misrepresentations but that is not why we are writing to you. We are writing to you because, in one of the emails, Mr. Ferlanti suggests that he is suffering from anxiety which interferes with his ability to perform his job. As a result, we need to schedule an immediate meeting with Mr. Ferlanti, in accordance with the ADA, to discuss his condition and determine whether any reasonable accommodations exist.

We would like to schedule this meeting as soon as possible, preferably today or tomorrow.

Please let us know what date and time works best for you and your client.

Sent from my iPhone

* * * * *

(Plaintiff's Counsel wrote)

Mr. Garcia:

I disagree with your interpretation of Mr. Ferlanti's email correspondence of even date relating to a complaint of retaliation, not a request for an accommodation. Nowhere in his complaint of retaliation does Mr. Ferlanti provide that he requires any accommodation to perform the essential functions of his job. As such, no meeting is necessary as you proclaim. What is necessary, however, is an investigation by the Borough as to why Mr. Ferlanti is being treated different than his co-workers. Specifically, on his first day back to work, he discovered that the handle to his work vehicle was broken. Additionally, why is Mr. Ferlanti separated from his co-workers who are in a designated breakroom with the door locked and watching television while Mr. Ferlanti is forced to sit in a stairwell?

I look forward to the investigation into those claims as well as the investigation into his earlier claims that still have not been addressed.

Thank you.

Rob

* * * * *

(Labor Counsel wrote)

So to be clear, you are stating that Mr. Ferlanti does not require any accommodations under the ADA?

Also, the Borough has already begun looking into Mr. Ferlanti's allegations.

Here is what i can tell you now:

The handle on the borough vehicle was damaged in an auto accident while Mr. Ferlanti was on leave.

As for the break room, it was locked my cleaning staff and, according to staff, was immediately opened after Mr. Ferlanti shouted down the hallway to have it opened.

Mr. Ferlanti chose not to wait for the room to be open and opted to sit in the stairwell instead.

As noted to Mr. Ferlanti in our meeting last week. The Borough expects ALL employees to act in a professional, non-belligerent manner while on duty. Any Borough employee who fails to meet that standard will be handled accordingly.

Sent from my iPhone

* * * * *

(Plaintiff's counsel wrote)

So to be clear, you are advising me of the results of your investigation before interviewing all necessary individuals – including the complainant. I look forward to the full investigation report when it is completed. Additionally, please provide me with the accident report for the handle of the vehicle in question and who made the decision not to fix same prior to Plaintiff returning to work.

As of this moment, Mr. Ferlanti does not require any accommodations to perform the essential functions of his job. However, given the fact that he is complaining of retaliation on his first day returning to work, that may change in the near future.

* * * * *

(Labor Counsel wrote)

Did you notice the “here is what I can tell you now” or the “the Borough has already BEGUN investigating”?

You see, what that means is we have STARTED to investigate and are sharing information with you now in a showing of good faith.

If you need any other assistance, or just need another lesson in reading comprehension, please let me know.

Sent from my iPhone

* * * * *

(Plaintiff's Counsel wrote)

Reading your email, I'm reminded of what two great men once said: “It's always the ones with dirty hands pointing fingers” and “Hypocrites are easy to recognize – they

spend most of their time pointing out the flaws of others and the rest of the time trying to flaunt their perfection.”

You will recall, however, that your failure to successfully comprehend a simple correspondence alleging retaliation has resulted in this communication. Your email to me identifying “Here is what I can tell you now” makes conclusory statements that you have proffered as fact by interviewing individuals on one side of the story. Garbage in is garbage out during an investigation, but you know that based upon your years of investigatory training. In any event, I look forward to your well-crafted, one-sided investigation report as I will use it as a training tool in the future.

* * * * *

(Labor Counsel wrote)

Per your request, a police report detailing the accident that damaged the Borough vehicle assigned to Mr. Ferlanti is attached for your review. I also attached two photographs of the vehicle.

The attached clearly refutes any allegation of “retaliation.”

Also, please note that you are not legally entitled to these documents but the Borough, once again, is sharing them with you as a showing of good faith.

* * * * *

(Plaintiff’s Counsel wrote)

Please be advised that I am deleting the attached police report that you, acting on behalf of the Borough, emailed to me without redacting the confidential personal identifiers of Driver 1 on the report. You failed to redact the insurance policy number, the driver’s license number, and the vehicle’s plate number in violation of the driver’s Constitutional right of privacy. I trust the Borough will advise the driver of vehicle 1 that his confidential information was wrongfully disclosed in violation of his rights under federal and State law.

Finally, I also inquired as to why Mr. Ferlanti’s work vehicle wasn’t repaired prior to his return to work. Thus, I do not believe it clearly refutes a claim of retaliation as your conclusory investigation provides. Some investigators may deem it necessary to interview the complainant and ascertain why he believes it wasn’t repaired and then make a finding.

(Plaintiff’s Counsel followed with the following)

Please be further advised that the broken handle is *on the inside* of Mr. Ferlanti’s work vehicle, not the outside of the vehicle as your investigation has purportedly revealed. To compliment your “good faith” investigation, disclosures, and flow of

information, I am attaching a photograph of the actual broken handle on the inside of the vehicle to aid you in supplementing your investigation of Mr. Ferlanti's complaints of retaliation.

79. To date, Plaintiff was never interviewed as part of Defendant's "good faith" investigation into his complaint of retaliation relating to the broken handle incident when Plaintiff returned from administrative leave.

80. On or about November 15, 2018, Plaintiff was not called in for overtime relating to a snow storm in retaliation for his prior complaints.

81. On or about November 19, 2018, Plaintiff received correspondence from the Borough Engineer/Deputy Manager advising that Plaintiff's April 19, 2018 complaint produced no evidence of a hostile work environment.

82. On or about November 19, 2018, without ever interviewing Plaintiff as part of the investigation, Plaintiff was disciplined for insubordination, neglect of duty, and conduct unbecoming a public employee.

83. Plaintiff has also suffered additional retaliation as a result of complaining about his supervisors and managers.

84. Since returning from Administrative Leave, Defendants have further retaliated against Plaintiff and have ostracized Plaintiff in the work environment.

85. As a direct and proximate result of the above conduct, Plaintiff suffered and/or will continue to suffer substantial loss of income; diminishment of career opportunity; loss of self-esteem; disruption of his personal and family life; physical and mental pain; emotional trauma and distress; pain and suffering; and other irreparable harm.

COUNT ONE

(Handicap Discrimination/Retaliation -- NJLAD)

86. Plaintiff repeats and realleges each and every allegation set forth in Paragraphs 1 through 85 of the Complaint as if set forth at length herein.

87. Plaintiff, who has been treated for, suffers from, and regarded as suffering from a handicap, was performing the essential functions of his job.

88. Plaintiff is qualified for and, in fact, successfully performs the duties of his employment.

89. Plaintiff is, and at all times relevant herein, meeting and/or exceeding Defendants' legitimate expectations of employment.

90. Plaintiff suffered and continues to suffer adverse employment actions as a direct result of his handicap.

91. Plaintiff suffered and continues to suffer adverse employment actions as a direct result of engaging in protected activity, i.e., complaining about discrimination and a hostile work environment.

92. Defendant, James Van Kruiningen, engaged in the above-described discriminatory/retaliatory conduct while acting within the scope of his employment for Defendants.

93. Defendant, James Van Kruiningen, aided, abetted, incited, compelled and/or coerced the performance of the above unlawful employment practices within the meaning of the NJLAD.

94. Defendant, Alan Neggia, engaged in the above-described discriminatory/retaliatory conduct while acting within the scope of his employment for Defendants.

95. Defendant, Alan Neggia, aided, abetted, incited, compelled and/or coerced the performance of the above unlawful employment practices within the meaning of the NJLAD.

96. Defendant, Joseph Raymond, engaged in the above-described discriminatory/retaliatory conduct while acting within the scope of his employment for Defendants.

97. Defendant, Joseph Raymond, aided, abetted, incited, compelled and/or coerced the performance of the above unlawful employment practices within the meaning of the NJLAD.

98. The above acts and practices of Defendants constitute unlawful employment practices within the meaning of the NJLAD.

99. Defendants caused Plaintiff to suffer the above-described adverse employment consequences because he complained about Defendants' discriminatory, illegal, offensive and improper behavior and conduct.

100. The above acts and practices of Defendants constitute unlawful discrimination/retaliation within the meaning of the NJLAD.

101. As a direct and proximate result of the above conduct, Plaintiff has suffered substantial loss of income and other pecuniary harm; diminishment of career opportunity; loss of self-esteem; disruption of his personal and family life; humiliation and embarrassment; emotional trauma and distress; physical manifestations of pain and suffering and other irreparable harm.

WHEREFORE, Plaintiff, Bryan Ferlanti, prays for judgment against Defendants, jointly and severally, as follows:

A. For money damages for all economic losses including, but not limited to, lost, past and future salary and fringe benefits;

B. For compensatory damages;

- C. For punitive damages;
- D. For emotional distress damages;
- E. For physical manifestations of pain and suffering;
- F. For attorneys' fees and costs of this action;
- G. For interest at the maximum legal rate on all sums awarded;
- H. For Consequential damages; and
- I. For such other and further relief as the Court deems just and proper.

COUNT TWO

(Hostile Work Environment -- NJLAD)

102. Plaintiff repeats and realleges each and every allegation set forth in Paragraphs 1 through 101 of the Complaint as if set forth at length herein.

103. The conduct alleged above was unwelcome by this Plaintiff.

104. The conduct alleged above specifically occurred because of Plaintiff's handicap.

105. A reasonable person in Plaintiff's position would consider the conduct alleged above to be sufficiently severe or pervasive to alter the conditions of his employment and to create a hostile, intimidating, abusive and/or offensive work environment.

106. The conduct alleged above did adversely affect Plaintiff's work environment and created a hostile work environment.

107. Plaintiff suffered, by reason of the conduct alleged above, tangible adverse consequences.

108. The alleged acts and practices of Defendants constitute unlawful hostile work environment within the meaning of the NJLAD.

109. Defendant, James Van Kruiningen, engaged in the above-described conduct while acting within the scope of his employment for Defendants.

110. Defendant, James Van Kruiningen, aided, abetted, incited, compelled and/or coerced the performance of the above unlawful employment practices within the meaning of the NJLAD.

111. Defendant, Alan Neggia, engaged in the above-described conduct while acting within the scope of his employment for Defendants.

112. Defendant, Alan Neggia, aided, abetted, incited, compelled and/or coerced the performance of the above unlawful employment practices within the meaning of the NJLAD.

113. Defendant, Joseph Raymond, engaged in the above-described conduct while acting within the scope of his employment for Defendants.

114. Defendant, Joseph Raymond, aided, abetted, incited, compelled and/or coerced the performance of the above unlawful employment practices within the meaning of the NJLAD.

115. The above acts and practices of Defendants constitute unlawful employment practices within the meaning of the NJLAD.

116. As a direct and proximate result of the above conduct, Plaintiff has suffered substantial loss of income and other pecuniary harm; diminishment of career opportunity; loss of self-esteem; disruption of his personal and family life; humiliation and embarrassment; emotional trauma and distress; physical manifestations of pain and suffering and other irreparable harm.

WHEREFORE, Plaintiff, Bryan Ferlanti, prays for judgment against Defendants, jointly and severally, as follows:

- A. For money damages for all economic losses including, but not limited to, lost, past and future salary and fringe benefits;
- B. For compensatory damages;
- C. For punitive damages;
- D. For emotional distress damages;
- E. For physical manifestations of pain and suffering;
- F. For attorneys' fees and costs of this action;
- G. For interest at the maximum legal rate on all sums awarded;
- H. For Consequential damages; and
- I. For such other and further relief as the Court deems just and proper.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Court Rule, R. 4:25-4, it is hereby asserted that Robert A. Tandy, Esq. is designated trial counsel for the trial of this action.

DEMAND FOR TRIAL BY JURY

Plaintiff, Bryan Ferlanti, herein demands a trial by jury on all issues.

DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS

Pursuant to R. 4:10-2(b), demand is hereby made that you disclose and make a copy to the undersigned of any insurance agreements or policies applicable to this action.

LAW OFFICE OF ROBERT A. TANDY, LLC
Attorney for Plaintiff

ROBERT A. TANDY

ROBERT A. TANDY, ESQ.

Dated: January 3, 2020

CERTIFICATION PURSUANT TO R.4:5-1 & 1:38-7(b)

I certify that the above matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, and I have no knowledge that any other action or arbitration proceeding is contemplated. To the best of my knowledge, no other party should be joined in this action. I further certify that confidential personal identifiers have been redacted in accordance with Rule 1:38-7(b).

LAW OFFICE OF ROBERT A. TANDY, LLC
Attorney for Plaintiff

ROBERT A. TANDY

ROBERT A. TANDY, ESQ.

Dated: January 3, 2020