

Intentional Infliction of Emotional Distress

63. Plaintiff repeats and makes a part hereof the allegations contained in each and every prior paragraph and count of this complaint as if same were more fully set forth at length herein.

64. Defendants are liable to plaintiff for the tort of intentional infliction of emotional distress in that (a) the acts of the Defendants and Plaintiff's emotional distress resulting therefrom were the result of intentional and/or reckless conduct on the part of Defendants; (b) the conduct was extreme and outrageous; (c) the conduct of Defendants was the proximate cause of the emotional injuries sustained by Plaintiff; and (d) the emotional distress sustained by Plaintiff was genuine and substantial and had a demonstrable negative effect on her life and work and has forced Plaintiff to seek medical and or psychological attention.

65. As a result of the conduct of Defendants, jointly and severally, Plaintiff has suffered compensatory damages, including, but not limited to the loss of her employment, including back and front pay, social security, fringe benefits, medical benefits, future earnings, emotional pain and suffering, physical pain and suffering, attorney's fees, and such other actual damages as permitted for recovery by the laws of the State of New Jersey and the United States of America.

66. The conduct of the Defendants, each of them, was willful and wanton.

WHEREFORE, Plaintiff demands judgment against the Defendants for compensatory and punitive damages, together with reasonable attorney's fees, costs of suit and such further relief as the Court may deem equitable and just.