

RICHARD D. POMPELIO, ESQ.
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Attorney for Plaintiff

D.D., a fictitious name	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: MORRIS COUNTY
Plaintiff	:	
	:	DOCKET NO.
vs.	:	
	:	CIVIL ACTION
M.M., a fictitious name, A.M., a	:	
fictitious name, B.M., a fictitious	:	
name, THE BOARD OF EDUCATION OF THE	:	
TOWNSHIP OF MOUNT OLIVE, Morris	:	
County, New Jersey	:	COMPLAINT AND
	:	JURY DEMAND

Plaintiff, D.D., residing at Village Green Apartments, Budd Lake, Township of Mount Olive, County of Morris, State of New Jersey by way of complaint against the Defendants says:

PARTIES

1. Plaintiff, D.D. was born on December 12, 1974 and at all times referred to herein was a student at Mount Olive High School, Mount Olive Township, Morris County, New Jersey.

Plaintiff is designated by a fictitious name pursuant to R4:26-4.

2. Defendant, M.M. was born on September 10, 1977 and at all times referred to herein was a student at Mount Olive High School, Mount Olive Township, Morris County, New Jersey.

Defendant is designated by a fictitious name pursuant to R4:26-4.

____ 3. Defendants, A.M. and B.M., at all times referred to herein, were the parents of Defendant, M.M. Said Defendants are designated by a fictitious name pursuant to R4:26-4.

4. Defendant, The Board of Education of the Township of Mount Olive, Morris County, New Jersey, at all times referred to herein, through its agents, servants and employees, all acting within the scope of their employment, owned, operated, managed, maintained and controlled the Mount Olive High School which is located at or near Corey Road, in Mount Olive Township, Morris County, New Jersey.

FACTS

5. On or about December 18, 1992 in the early afternoon hours Plaintiff, D. D., as a full time student, was lawfully on the premises of the Mount Olive High School located in Mount Olive Township, Morris County, New Jersey.

6. At the aforesaid time, date and place, the Defendant, M.M. did physically attack the Plaintiff, D.D. in that he struck and pushed Plaintiff, physically restrained her against her will and engaged in other forms of unpermitted, unprovoked and non-consensual touching, including sexually offensive touching. Defendant, M.M. further made advances towards Plaintiff, and engaged in conduct of a sexually lewd and vile nature.

7. Defendant M.M. was subsequently charged as a juvenile offender by the Mt. Olive Township Police for the offenses of criminal sexual contact, which is a fourth degree crime if committed by an adult, under the provisions of N.J.S.A. 2C: 14-3 and aggravated sexual assault, which is a second degree crime if

committed by an adult, under the provisions of N.J.S.A. 2C: 14-2.

8. On or about January 19, 1993 Defendant, M.M., appeared before the Superior Court of New Jersey, Chancery Division, Family Part, Morris County and the Defendant through his legal counsel requested that the Court permit the Defendant, M.M. to return to school. The request of the Defendant, M.M., was supported or otherwise unopposed by the Defendant, The Board of Education of Mt. Olive Township, through its agents, servants and employees. The Court ordered that the Defendant, M.M., was permitted to return to Mount Olive High School subject to the following condition:

"No contact with victim, school to set up a schedule to confine [M.M.] to rooms when not in class; commence counseling."

9. On or about January 25 and 26, 1993 the trial of the aforesaid charges was held at the Morris County Courthouse, at which time both Plaintiff and Defendant testified. Defendant, M.M. was adjudicated to be guilty of criminal sexual contact in violation N.J.S.A. 2C: 14-3.

10. On or about January 27, 1993 Plaintiff returned to school and became aware that Defendant, M.M. had also returned to school. The Order of the Court was not followed by Defendant, M.M. and not effectively implemented by Defendant, The Board of Education of Mt. Olive Township. As a result thereof, Plaintiff was compelled to be in the presence of Defendant, M.M., on numerous and various occasions, at which

times Defendant, M.M., engaged in conduct, including language and physical gestures which caused the Plaintiff to suffer fear, intimidation and extreme emotional distress and mental anguish and she was forced to leave school.

11. At and during the period between January 27, 1993 and February 22, 1993, Plaintiff, D.D. attempted on numerous occasions to return to school and exercise her right to a free, appropriate and uninterrupted education pursuant to the provisions of N.J.S.A. 18A:38-1 et seq. During said period of time, Plaintiff, individually and through her parents, personally requested of various agents, servants and employees of the Defendant, The Board of Education of Mt. Olive Township, including but not limited to the Superintendent of Schools, that the constitutional and statutory rights of Plaintiff, D.D. be protected and safeguarded, that the order of the Court be adequately, properly and effectively enforced and that Plaintiff, D.D. be protected from the fear, anxiety and emotional distress of having to confront Defendant, M.M. on a daily basis while at school.

12. During the aforesaid time period Plaintiff, D.D. was forced to confront Defendant, M.M. on numerous and various occasions while at school and on such occasions, Defendant, M.M. engaged in various forms of conduct which caused Plaintiff, D.D. extreme physical and mental pain and suffering.

13. Plaintiff and Plaintiff's parents continued to make numerous requests to the Superintendent of Schools of Defendant, The Board of Education of Mt. Olive Township and numerous other

agents, servants and employees of said Defendant to protect and enforce her rights as a student to a free and uninterrupted education and her rights as a crime victim pursuant to the Constitution and statutes of the State of New Jersey. The Defendant, The Board of Education of Mt. Olive Township, through its agents, servants and employees neglected, failed or otherwise refused to recognize and respect the rights of Plaintiff.

14. On or about February 22, 1993, Plaintiff, D.D. was compelled to engage the services of private legal counsel in order to advocate and protect her constitutional and statutory rights and cause the order of the Court to be followed and adhered to by the Defendants, M.M., A.M., B.M. and The Board of Education of Mount Olive Township.

15. On or about February 22, 1993 an application was made to the Court on behalf of Plaintiff, D.D. to compel the Defendants, M.M. and Board of Education of the Township of Mount Olive to comply with the Court's order of January 19, 1993.

16. On or about February 24, 1993 an evidentiary hearing was held in the Superior Court of New Jersey and the Court entered an order which provided, inter alia, that Defendant, M. M. "is not to return to school for the duration of the Spring 1993 academic term."

17. At and during the period of time between January 27, 1993 and February 24, 1993, the Defendant, The Board of Education of the Township of Mount Olive, through its agents, servants and employees were advised of the conduct of Defendant,

M.M. and its effect upon Plaintiff, nevertheless, said Defendant, The Board of Education of Mt. Olive Township, demonstrated extreme indifference to the constitutional, statutory and court ordered rights of Plaintiff, and to her emotional and physical well being by failing to adequately protect and safeguard Plaintiff from the effects of the presence of Defendant, M. M. upon the Plaintiff while on the premises of the Mount Olive High School.

FIRST COUNT

18. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 of this complaint as if same were more fully set forth at length herein.

19. On or about December 18, 1992 at the time and place as previously stated the Defendant, M. M. did commit upon Plaintiff an assault and battery through the intentional and unpermitted touching of Plaintiff as heretofore described.

20. As a proximate consequence of the assault and battery committed on Plaintiff by Defendant, M. M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

21. The conduct of the Defendant, M. M. was wilful and wanton and Plaintiff is entitled as a matter of law to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against the Defendant, M. M. on this count of this complaint for compensatory and punitive damages, together with attorneys's fees, costs of suit and such further relief as the Court may deem equitable and just.

SECOND COUNT

22. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 and the First Count of this complaint as if same were more fully set forth at length herein.

23. Between January 27, 1993 and February 22, 1993 at various times and while on the premises of the Mount Olive High School, the Defendant, M. M. did commit upon Plaintiff an assault through his physical gestures and other forms of conduct which resulted in Plaintiff being placed in fear for her physical and emotional safety and well being.

24. As a proximate consequence of the assault committed on Plaintiff by Defendant, M. M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

25. The conduct of the Defendant, M. M. was willful and wanton and Plaintiff is entitled as a matter of law to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against the Defendant M.M. on this count of this complaint for compensatory and punitive damages, together with attorneys's fees, costs of suit and such further relief as the Court may deem equitable and just.

THIRD COUNT

26. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 the First Count and the Second Count of this complaint as if same were more fully set forth at length herein.

27. At all times referred to herein, Defendant, M.M. engaged in tortious conduct which was so outrageous in character and so extreme in degree, as to go beyond all possible bounds of decency and to be regarded as atrocious and utterly intolerable in a civilized community. Such conduct constitutes the intentional infliction of emotional distress by the Defendant, M.M. upon the Plaintiff.

28. As a proximate consequence of the intentional infliction of emotional distress committed on Plaintiff by Defendant, M.M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

29. The conduct of the Defendant, M.M. was wilful and wanton and Plaintiff is entitled as a matter of law to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against the Defendant, M. M. on this count of this complaint for compensatory and punitive damages, together with attorneys's fees, costs of suit and such further relief as the Court may deem equitable and just.

FOURTH COUNT

30. Plaintiff repeats and makes a part hereof the allegations contained in Paragraphs 1-17 of Counts One through Three of this complaint as if same were more fully set forth at length.

31. On or about December 18, 1992 at the time and place as previously stated the Defendant, M.M. did commit upon the plaintiff an assault and battery through the negligent and/or reckless touching of Plaintiff as heretofore described.

32. As a proximate consequence of the negligent and/or reckless assault and battery committed on Plaintiff by Defendant, M.M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

WHEREFORE, Plaintiff demands judgment against the Defendant, M.M. on this count of this complaint for compensatory damages, together with attorneys' fees, costs of suit and such further relief as the Court may deem equitable and just.

FIFTH COUNT

33. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 Counts One through Four of this complaint as if same were more fully set forth at length herein.

34. Defendant, M.M. owed to Plaintiff a duty to refrain from engaging in any form of visual contact, physical gestures and all other forms of conduct which could reasonably result in Plaintiff being placed in fear for her physical and emotional safety and well being.

35. Defendant, M. M. wrongfully breached this duty to Plaintiff in that he engaged in various forms of conduct, including visual contact, physical gestures and other forms of unwarranted conduct, which were the proximate cause of emotional injuries and such other compensatory damages sustained by Plaintiff.

36. As a proximate consequence of the negligent infliction of emotional distress committed on Plaintiff by Defendant, M.M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of

potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

WHEREFORE, Plaintiff demands judgment against the Defendant, M. M. on this count of this complaint for compensatory damages, together with attorneys's fees, costs of suit and such further relief as the Court may deem equitable and just.

SIXTH COUNT

37. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 of Counts One through Five of this complaint as if same were more fully set forth at length herein.

38. The conduct of the Defendant, M. M. was criminal in nature and as a result thereof Plaintiff became a victim of Defendant's criminal conduct thereby placing Plaintiff into the criminal justice system and requiring her to assume the status of a crime victim. As a victim of a crime Plaintiff possessed the right to be treated with fairness, compassion and respect pursuant to the Amendment to the New Jersey Constitution Establishing the Rights of Crime Victims (Article I, Paragraph 22, adopted November 5, 1991); and the right to be free from intimidation and such other rights pursuant to the provisions of N.J.S.A. 52:4B-34, et seq., the "Crime Victim's Bill of Rights".

39. Defendant, M. M. engaged in certain conduct, as aforesaid, which intentionally or in the alternative, recklessly, negligently or otherwise wrongfully violated the New

Jersey Constitutional and Statutory rights which protect Plaintiff as a victim of a crime.

40. As a proximate consequence of the violation of Plaintiff's state constitutional and statutory rights by Defendant, M.M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

41. The conduct of Defendant, M.M. if adjudged to be intentional, was wilful and wanton and Plaintiff is entitled as a matter of law to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against the Defendant, M. M. on this count of this complaint for compensatory and punitive damages, together with attorneys's fees, costs of suit and such further relief as the Court may deem equitable and just.

SEVENTH COUNT

 42. Plaintiff repeats and makes a party hereof the allegations contained in paragraphs 1-17 and Counts One through Six of this complaint as if same were more fully set forth at length herein.

43. Defendants, A.M. and B.M., parents of defendant, M.M. knew or had reason to know of their son's propensity towards violence and/or such other forms of conduct which could be

harmful to others, including Plaintiff and as a result thereof said Defendants had a duty to warn the Administration and other officials of the school system under the jurisdiction of the Defendant, The Mount Olive Board of Education of such propensity toward violent conduct on such other conduct which could result in injury to others.

44. Defendants, A.M. and B.M. negligently and/or recklessly breached this duty in that they failed to provide any information or other form of warning to others concerning the propensity of their son's conduct which could result in injury to others.

45. The consequences of the conduct of Defendants, A.M. and B.M. was foreseeable.

46. As a proximate consequence of the negligent and/or reckless conduct committed on Plaintiff by Defendant, M.M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

47. The conduct of the Defendant, M.M. was wilful and wanton and Plaintiff is entitled as a matter of law to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against the Defendants, A.M. and B.M. on this count of this complaint for compensatory and punitive damages, together with attorney's

fees, costs of suit and such further relief as the Court may deem equitable and just.

EIGHTH COUNT

48. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 and Counts One through Seven of this complaint as if same were more fully set forth at length herein.

49. The Defendant, The Board of Education of Mt. Olive Township had a duty to Plaintiff and other students of Mt. Olive High School to exercise reasonable supervisory care for the safety of its students and to take reasonable precautions for the safety and well being of its students.

50. Defendant, The Board of Education of Mt. Olive Township breached this duty to Plaintiff in that, through the negligence and/or reckless conduct of its agents, servants and employees it failed to care for Plaintiff's safety and take reasonable precautions for Plaintiff's safety and well being.

51. As a proximate consequence of the negligence and/or reckless conduct of Defendant, The Board of Education of Mt. Olive Township, Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

WHEREFORE, Plaintiff demands judgment against the Defendant, The Board of Education of Mt. Olive Township on this count of this complaint for compensatory and punitive damages, together with attorneys' fees, costs of suit and such further relief as the Court may deem equitable and just.

NINTH COUNT

52. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 and Counts One through Eight of this complaint as if same were more fully set forth at length herein.

53. The conduct of the Defendant, M.M. was criminal in nature and as a result thereof Plaintiff became a victim of Defendant's criminal conduct thereby placing Plaintiff into the criminal justice system and requiring her to assume the status of a crime victim. As a victim of a crime Plaintiff possessed the right to be treated with fairness, compassion and respect pursuant to the Amendment to the New Jersey Constitution Establishing the Rights of Crime Victims (Article I, Paragraph 22, adopted November 5, 1991); and the right to be free from intimidation and such other rights pursuant to the provisions of N.J.S.A. 52:4B-34, et seq., the "Crime Victim's Bill of Rights".

54. The Defendant, The Board of Education of Mt. Olive Township, through its agents, servants and employees had a duty to recognize, respect and protect the rights of Plaintiff as a crime victim.

55. Numerous and various requests were made by Plaintiff and Plaintiff's parents to the Defendant, The Board of Education

of Mt. Olive Township and to its agents, servants and employees to recognize, respect and protect the rights of Plaintiff as a crime victim.

56. Defendant, The Board of Education of Mt. Olive Township through the conduct of its agents, servants and employees, wrongfully breached its duty to Plaintiff in that it negligently and/or recklessly violated the New Jersey Constitutional and statutory rights of which protect Plaintiff as a victim of a crime.

57. The consequences of Defendant's conduct were foreseeable.

58. As a proximate consequence of the violation of Plaintiff's state constitutional and statutory rights committed on Plaintiff by Defendant, The Board of Education of Mt. Olive Township, Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

WHEREFORE, Plaintiff demands judgment against the Defendant, The Board of Education of Mt. Olive Township on this count of this complaint for compensatory and punitive damages, together with attorneys' fees, costs of suit and such further relief as the Court may deem equitable and just.

TENTH COUNT

59. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 and Counts One through Ninth of this complaint as if same were more fully set forth at length herein.

60. The conduct of the Defendant, M.M. was criminal in nature and as a result thereof Plaintiff became a victim of Defendant's criminal conduct thereby placing Plaintiff into the criminal justice system and requiring her to assume the status of a crime victim. As a victim of a crime Plaintiff possessed the right to be treated with fairness, compassion and respect pursuant to the Amendment of the New Jersey Constitution Establishing the Rights of Crime Victims (Article I, Paragraph 22, adopted November 5, 1991); and the right to be free from intimidation and such other rights pursuant to the provisions of N.J.S.A. 52:4B-34, et seq., the "Crime Victim's Bill of Rights".

61. Numerous and various requests were made by Plaintiff and Plaintiff's parents to the Defendant, The Board of Education of Mt. Olive Township and to its agents, servants and employees to recognize, respect and protect the rights of Plaintiff as a crime victim. Defendants A.M. and B.M. knew or should have known of these requests.

62. Defendants, A.M. and B.M., knew or should have known that the presence of their son, Defendant, M.M., at Mt. Olive High School did cause Plaintiff to suffer intimidation and other forms of physical and mental anguish in violation of Plaintiff's rights as a crime victim. Defendants, A.M. and B.M. had a duty to recognize and respect the aforesaid rights of Plaintiff.

63. Defendants, A.M. and B.M. wrongfully breached their duty to Plaintiff in that they negligently and/or recklessly violated the New Jersey Constitutional and statutory rights which protect Plaintiff as a victim of crime.

64. The consequences of Defendants' conduct were foreseeable.

65. As a proximate consequence of the violation of Plaintiff's constitutional and statutory rights committed on Plaintiff by Defendants, A.M. and B.M., has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

WHEREFORE, Plaintiff demands judgment against the Defendants, A.M. and B.M. on this count of this complaint for compensatory and punitive damages, together with attorneys' fees, costs of suit and such further relief as the Court may deem equitable and just.

ELEVENTH COUNT

66. Plaintiff repeats and makes a part hereof the allegations contained in paragraphs 1-17 and this complaint as if same were more fully set forth at length herein.

67. Plaintiff is entitled to the constitutional rights and protections of the Fourteenth Amendment to the Federal

Constitution of the United States in that she is entitled to due process of law.

68. The presence of the Defendant, M.M., on the premises of the Mt. Olive High School during the period between January 27, 1993 and February 22, 1993 did cause Plaintiff extreme physical and mental anguish and did otherwise deprive Plaintiff of her liberty and other rights as guaranteed to her by the Fourteenth Amendment to the Federal Constitution.

69. The Defendant, The Board of Education of Mt. Olive Township, through its agents, servants and employees, acting under color of law did fail to protect the health and safety of Plaintiff to whom it owed an affirmative duty of protection in that after being made aware of the effects upon Plaintiff which were created by the presence of Defendant, M.M., the Defendant, The Board of Education of Mt. Olive Township failed to take reasonable, necessary and proper steps to protect Plaintiff.

70. The Defendant, The Board of Education of Mt. Olive Township, through its agents, servants and employees exercised extreme indifference to the rights of Plaintiff as reflected in, but not limited to, the words and conduct of the Superintendent of Schools of the Defendant, the Board of Education of Mt. Olive Township, in which he advised Plaintiff's parents that the Defendant, M.M., was "only found guilty of sexual contact -- touching" while minimizing the severity of the conduct of Defendant, M.M., and characterized such conduct as simply the "young man's poor judgment".

71. The actions, words and attitude of the Defendant, The Board of Education of Mt. Olive Township, as reflected in the conduct of its Superintendent of Schools caused Plaintiff extreme emotional distress in that, as a victim of a criminal act she was treated as a wrongdoer and otherwise revictimized by the public institution which was charged with protecting her.

72. The actions, words and such other conduct of the Defendant, The Board of Education of Mt. Olive Township did violate Plaintiff's rights to due process of law under the Fourteenth Amendment for the Federal Constitution and Plaintiff is entitled to relief pursuant to the provisions of 28 U.S.C. 1983.

73. As a proximate consequence of the violation of Plaintiff's Federal constitutional and statutory rights by Defendant, M.M., Plaintiff has incurred compensatory damages, including but not limited to physical pain and suffering, medical expenses, legal expenses, emotional trauma and emotional distress, diminished enjoyment of life, costs of counseling, lost wages, loss of potential scholastic scholarship benefits and will continue to suffer such compensatory damages in the future.

WHEREFORE, Plaintiff demands judgment against the Defendant, The Board of Education of Mt. Olive Township on this count of this complaint for compensatory damages, together with attorneys' fees, costs of suit and such other relief as the Court may deem equitable and just.

JURY DEMAND

Plaintiff hereby demands a trial by jury as to all issues.

Dated: RICHARD D. POMPELIO, ESQ.
Attorney for Plaintiff

By: _____
Richard D. Pompelio

CERTIFICATION

I hereby certify pursuant to R.4:5-1 that this matter is not presently the subject of any other action pending in any court or of a pending arbitration proceeding. Furthermore, no such action or arbitration proceeding is being contemplated at this time. Also, to the best of my knowledge, there are no other parties that should be joined in this action at this time.

Dated: RICHARD D. POMPELIO, ESQ.
Attorney for Plaintiff

By: _____
Richard D. Pompelio

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of R.4:25-4, Richard D. Pompelio,

Esq. is hereby designated as trial counsel on behalf of the Plaintiff.

Dated:

RICHARD D. POMPELIO, ESQ.
Attorney for Plaintiff

By: _____
Richard D. Pompelio