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ANTHONY PEASE, LESTER HARRIS, and ERIC DARE, Plaintiffs, vs. TOWNSHIP OF MONROE, GREGORY WOLFE, JOHN MCBRIDE, MARK BURTON, JAMES DEHART, FELECIA MCBRIDE, CHRISTINE SCOLIA, JOHN DOES 1-10 (said names being fictitious, real names unknown) and ABC ENTITIES 1-10 (said names being fictitious, real names unknown), Defendant(s).	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – GLOUCESTER COUNTY Docket Number: GLO-L- CIVIL ACTION **COMPLAINT AND JURY DEMAND**

Plaintiffs, ANTHONY PEASE, residing at 1701 Bluestem Avenue, in the Township of Monroe, in the County of Gloucester, in the State of New Jersey, LESTER HARRIS, residing at 791 Radix Road, in the Township of Monroe, in the County of Gloucester, in the State of New Jersey, and ERIC DARE, residing at 570 Jones Road, in the Township of Monroe, in the County of Gloucester, in the State of New Jersey (collectively "Plaintiffs") by way of Complaint against Defendants, say:

PARTIES

1. Plaintiff Lester Harris is an adult individual residing in Gloucester County, New Jersey and at all times relevant hereto was employed by the Monroe Township Police Department ("MTPD").
2. Plaintiff Anthony Pease is an adult individual residing in Gloucester County, New Jersey and at all times relevant hereto was employed by the MTPD.
3. Plaintiff Eric Sean Dare is an adult individual residing in Gloucester County, New Jersey and at all times relevant hereto was employed by the MTPD.
4. Defendant Township of Monroe is a municipal corporation organized under the laws of the State of New Jersey with its principal place of business at 125 Virginia Avenue, Williamstown, New Jersey 08094. The Township operates the MTPD and is an "employer" within the meaning of the Age Discrimination in Employment Act, 29 U.S.C. § 630(b) ("ADEA"), and the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. ("NJLAD").
5. Defendant Gregory Wolfe is the Mayor of the Township of Monroe is an "employer" within the meaning of the NJLAD and ADEA.
6. Defendant John McBride is the Chief of Police of the MTPD and is an "employer" within the meaning of the NJLAD and ADEA.
7. Defendant Mark Burton is the Deputy Chief of Police of the MTPD and is an "employer" within the meaning of the NJLAD and ADEA.
8. Defendant James DeHart is the Business Administrator for the Township of Monroe and is an "employer" within the meaning of the NJLAD and ADEA.
9. Defendant Christine Scola ("Scola") is the Township's Human Resources representative and facilitated discriminatory hiring and promotional processes.

10. Defendant Felicia McBride ("F. McBride") is employed in Human Resources and participated in the discriminatory and retaliatory actions complained of herein.

JURISDICTION AND VENUE

11. This Court has jurisdiction over this action pursuant to the NJLAD.

12. Venue is proper in Gloucester County because the Township of Monroe is located in Gloucester County, the MTPD is located in Gloucester County, Plaintiffs reside and work in Gloucester County, and all of the acts and omissions giving rise to the claims occurred in Gloucester County.

FACTUAL ALLEGATIONS

13. Plaintiff Pease was hired on August 23, 1999, promoted to Sergeant in November 2017, and to Lieutenant in early 2023. Plaintiff Pease has served in various roles, including as a member of the Monroe Township Entry Team (Tactical Team) from August 2004 to 2016, where he advanced to Squad Leader; in the Traffic Safety Bureau (TSB) from October 2005 to December 2015, achieving advanced training as a Crash Reconstructionist and being declared a court expert; as a School Resource Officer (SRO) at Williamstown High School; and as a platoon sergeant in the Patrol Division starting February 1, 2018. Additionally, since July 2006, Plaintiff Pease has been part of the Monroe Township Police Officers Association (MTPOA) committee, serving in roles such as Chairman, Co-Chairman, and Treasurer until 2024.

14. Plaintiff Harris was hired on August 23, 1999, promoted to Sergeant in November 2017, and to Lieutenant in April 2022. Plaintiff Harris began taking on duties of the Operations Captain position vacated by retiring Captain Montone, including handling on-call administrative responsibilities as confirmed in a December 18, 2024, text from Captain

Burton. In November of 2025, Plaintiff Harris was removed from his Internal Affairs position and re-assigned to the traffic safety unit and was assigned minimal to no responsibilities. Later in November, Plaintiff was notified that he was being re-assigned again back to the patrol division. That reassignment was effective January 12, 2026. Plaintiff Harris has served the MTPD for over 27 years without negative performance notices, disciplinary actions, or absences due to injury or sickness.

15. Plaintiff Dare was hired as a dispatcher in 1997, promoted to full-time police officer in 2003 (with backdated seniority to August 23, 1999), to Sergeant, and then to Lieutenant. Plaintiff Dare has served the MTPD for over 28 years without any negative performance notices, disciplinary actions, or absences due to injury or sickness. His roles have included patrol officer from July 23, 2003, to April 2021, where he became a field training officer, Assistant Terminal Agency Coordinator (TAC), Primary TAC, Co-Chairman and Chairman of the MTPOA; transfer to the Professional Standards Unit (PSU) in April 2021, assuming duties such as NJSACOP Accreditation Standards, policy writing/revision, records administration, Power DMS and Benchmark administration, TAC and New Jersey Courts administration, New Jersey Police Licensing, background checks on vendors and personnel, supervision of training coordinator and internal affairs investigator, and managing the department's website and special orders; and promotion to Lieutenant on August 28, 2023.
16. In late 2024 and early 2025, MTPD had vacancies for Captain positions due to retirements.
17. On December 23, 2024, a Captain position was posted. Plaintiff Harris was the only applicant by the January 6, 2025 closing date. He was reassigned to learn the Special Operations Commander role in preparation for promotion. Plaintiff Harris began taking on

duties of the Operations Captain position vacated by retiring Captain Montone, including handling on-call administrative responsibilities as confirmed in a December 18, 2024, text from Captain Burton.

18. On January 29, 2025, following Chief Borkowski's retirement announcement, positions for Chief, Deputy Chief, and Captain were posted, requiring 3 years of supervisory experience for Captain. Plaintiffs Pease, Harris, and Dare (along with others) submitted letters of interest by February 12, 2025. At this time, Plaintiffs Pease, Harris, and Dare were eligible for all positions, with Plaintiff Pease having supervisory experience since November 2017. Prior to the deadline, Deputy Chief McBride solicited junior officers, including visiting Lt. Edward Brown's home with beer to encourage submission of letters, violating MTPD Rules and Regulations (3:5.7) on intercession and solicitation. This was done to prompt Lt. Yorio to apply, as he initially refused unless less senior officers did. On February 11, 2025, upon learning Lt. Gabbianelli submitted a letter, Plaintiffs Dare and others followed suit. Speculation arose that promotions for Chief and Deputy Chief were predetermined due to personal relationships, such as Deputy Chief McBride's friendship with Mayor Wolfe and Captain Burton's with Business Administrator DeHart.
19. Interviews for Chief and Deputy Chief occurred on February 13, 2025. During Plaintiff Pease's interview, Mayor Wolfe referred to him as an "old guy" and inquired about his retirement plans, stating the Township was "tired of turnover" and implying a preference against officers eligible to retire. Pease responded that he was not near mandatory retirement and could commit to additional service. Plaintiff Pease was shocked by the age reference and looked to HR Scola, believing age and pension eligibility would factor into

decisions. Public Safety Director Rumpf had previously referenced preferring candidates with "longevity left" in August/September 2023.

20. Captain interviews occurred on February 21, 2025. During these interviews, Mayor Wolfe again referenced Plaintiffs' ages and retirement eligibility, implying these factors disqualified them. Similar comments were made to Plaintiffs Harris and Dare. During Plaintiff Dare's interview, Mayor Wolfe expressed concerns about Dare's pension time and age, with Dare responding he had much to offer and could commit years if needed; Wolfe interrupted, stating "you would be an idiot for staying" beyond 30 years and commenting to Rumpf about the "grass being green." The panel included Wolfe, DeHart, Scola, Kurz, Rumpf, McBride, Burton, and F. McBride. Plaintiffs Harris, Pease, Dare, and Maiorano all reported similar age and retirement comments. Sgt. Bielski and Sgt. Darcangelo submitted letters despite lacking 3 years' supervisory experience.
21. On February 22, 2025, Lt. William Yorio was selected for one Captain position. The second position was not filled, despite two vacancies. Plaintiffs discussed the selections, noting only one promotion and the age comments. Retired Captain Miraglia later learned from Deputy Mayor Kurz that the second position would reopen before summer.
22. Plaintiffs discussed the age-related comments among themselves and with others, including Lt. Yorio and Detective Sgt. Bielski.
23. On May 19, 2025, another Captain posting occurred. Interviews were held on June 4, 2025. The closing date of June 2, 2025, coincided with Sgts. Bielski and Darcangelo achieving 3 years' supervisory experience. Interviews included Plaintiffs Harris and Pease, Lt. Gabbianelli, Sgts. Bielski and Darcangelo—all younger and not retirement-eligible except

Plaintiffs. Chief McBride emailed candidates that decisions would be made June 9 after further discussion, amid rumors of legal advice on selections to avoid litigation.

24. On June 9, 2025, Lt. Michael Gabbianelli and Sgt. Kevin Bielski were selected. The Township amended its ordinance to allow a third Captain position to accommodate these selections. The ordinance change, requiring two council readings, indicated pre-planning. Selected candidates were younger (Yorio 47, Gabbianelli 45, Bielski 40) with less service time than Plaintiffs (all over 25 years, ages 52-58).

25. Plaintiffs were not promoted despite superior qualifications, experience, and certifications.

26. Following the non-promotions, Plaintiffs faced adverse actions. For Plaintiff Dare: Administration became distant; Chief McBride limited interactions and reassigned tasks to Sgt. Morris, bypassing Dare; on April 17, 2025, reassigned to Administrative Lieutenant for firearms backgrounds in basement office, retaining PSU duties despite removal from unit; backlog of 87 applications made PSU work impossible; on June 12, 2025, transferred to Patrol Division Delta Platoon effective July 14, 2025, without training replacement; surrendered 2023 Chevrolet Malibu for damaged 2015 Ford Explorer; scanner removed from office despite offering accreditation help; on November 26, 2025, temporarily reassigned to PSU for accreditation until April 2026, but without proper equipment initially. For Plaintiff Pease: On June 23, 2025, reassigned from TSB to Patrol Bravo Platoon without explanation; vehicle changed from 2020 Dodge Durango to 2016 Ford Explorer; on January 15, 2026, received first-ever Counseling Notice for scheduling issues, imposing 30-day loss of take-home vehicle; filed grievance and retaliation complaint; ranked #1 on Civil Service Captain list effective January 29, 2026.

27. In August 2023, Public Safety Director Rumpf referenced preferring candidates with "longevity left" in their careers.
28. In 2025, Retired D Chief. Jacob Jacobi reported Mayor Wolfe stating a desire to promote "younger" officers without retirement eligibility. On August 19, 2025, Jacobi told Plaintiff Dare that Wolfe, during a visit to Jacobi's business, said the administration wanted younger officers without pension time to retire, expressing agitation and offering to testify.
29. The 2025 MTPOA contract, effective January 1, 2026, includes provisions targeting senior officers: 0% raises for top-scale officers in 2026 and first half of 2027, and frozen healthcare costs only if retiring within 90 days of eligibility so as to try to coerce retirement. This disproportionately affects Plaintiffs, with the 90-day window expiring April 1, 2026, for them; Sgts. Darcangelo and Maute explained it targeted senior officers; no raises for 1.5 years to see 4% increase.
30. Defendants' actions were motivated by age discrimination.
31. The adverse reassignments and contract terms constitute retaliation and continuing discrimination.
32. Plaintiffs faced harassment, including ignored communications, bypassed responsibilities, punitive measures without due process, and an awkward environment pressuring retirement

COUNT I – AGE DISCRIMINATION (FAILURE TO PROMOTE) IN VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

33. Plaintiffs reallege and incorporate by reference the allegations contained in preceding paragraphs as if fully set forth herein.

34. The NJLAD prohibits employers and individuals from discriminating against employees on the basis of age with respect to any term, condition, or privilege of employment, including promotions. See N.J.S.A. 10:5-12(a).
35. Plaintiffs are members of a protected class under the NJLAD, as they are over the age of 40 (specifically ages 52, 57, and 58) and were subjected to discrimination based on their age and perceived proximity to retirement.
36. Plaintiffs were qualified for the Captain positions, possessing the requisite supervisory experience (far exceeding the 3-year minimum), Civil Service certifications, specialized training (e.g., hostage negotiation for Harris, tactical team for Pease, accreditation for Dare), clean records with no disciplinary history, and proven performance in high-level roles.
37. Defendants failed to promote Plaintiffs, instead favoring younger candidates with inferior qualifications, as detailed in the factual allegations, including the selections of Lt. Yorio (age 47), Lt. Gabbianelli, and Sgt. Bielski.
38. The interview panel made age-related comments, including direct quotes such as Mayor Wolfe calling Harris "old," referring to Pease as an "old guy," and questioning Dare's retirement plans while stating "you would be an idiot if you stayed" beyond 30 years, which went unaddressed by Defendants Scola, McBride, Burton, DeHart, Kurz, and Rumpf.
39. Decision-makers expressed preference for younger officers, including statements by Public Safety Director Rumpf preferring candidates with "longevity left," Mayor Wolfe's comments at social events about promoting "younger officers without pension time," and Retired Captain Jacob Jacobi's report of Mayor Wolfe stating a desire to promote "younger" officers without retirement eligibility.

40. The ordinance change was pre-planned to accommodate younger officers, and the promotion process was manipulated, including delaying interviews, amending ordinances, and encouraging ineligible younger applicants.
41. Discriminatory animus is evident from the explicit age-based comments during interviews and the Township's manipulation of the promotion process.
42. The individual Defendants participated in, ratified, or aided the discrimination through their roles in the interview panels, promotion decisions, and subsequent reassignment.

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly and severally, for harm suffered as a result of Defendants' age discrimination (failure to promote) in violation of the New Jersey Law Against Discrimination as follows: (a) compensatory damages; (b) punitive damages; (c) attorneys' fees with appropriate enhancement under Rendine v. Pantzer, 141 N.J. 292 (1995); and (d) such other relief as may be available pursuant to New Jersey Law Against Discrimination in which this court deems to be just and equitable.

COUNT II – DISPARATE TREATMENT IN VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

43. Plaintiffs reallege and incorporate by reference the allegations contained in preceding paragraphs as if fully set forth herein.
44. The NJLAD prohibits employers and individuals from subjecting employees to disparate treatment on the basis of age with respect to any term, condition, or privilege of employment. See N.J.S.A. 10:5-12(a).
45. Plaintiffs are members of a protected class under the NJLAD, as they are over the age of 40 (specifically ages 52, 57, and 58) and were subjected to disparate treatment based on their age and perceived proximity to retirement.

46. Following the non-promotions, Plaintiffs faced materially adverse changes in the conditions of their employment, including: the basement reassignment for Dare; removal from the Police Services Unit (PSU) for Harris; patrol transfer for Pease and Dare; loss of vehicle for Pease and Dare, who were assigned inferior or older vehicles; and removal of tools/equipment, such as Dare's scanner.
47. Younger officers were allowed detective bureau space, while Plaintiffs were isolated and marginalized.
48. A younger captain sought Plaintiffs' guidance, highlighting their superior qualifications yet underscoring the disparate treatment in assignments and resources.
49. These actions constituted materially adverse changes in the terms and conditions of Plaintiffs' employment, as they diminished authority, resources, and professional opportunities, and were motivated by age discrimination.
50. The individual Defendants participated in, ratified, or aided the disparate treatment through their roles in the reassignment decisions and failure to intervene.

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly and severally, for harm suffered as a result of Defendants' disparate treatment in violation of the New Jersey Law Against Discrimination as follows: (a) compensatory damages; (b) punitive damages; (c) attorneys' fees with appropriate enhancement under Rendine v. Pantzer, 141 N.J. 292 (1995); and (d) such other relief as may be available pursuant to New Jersey Law Against Discrimination in which this court deems to be just and equitable.

COUNT III – UNLAWFUL RETALIATION IN VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

51. Plaintiffs reallege and incorporate by reference the allegations contained in preceding paragraphs as if fully set forth herein.
52. The NJLAD prohibits retaliation against employees who oppose discriminatory practices or participate in protected activities. See N.J.S.A. 10:5-12(d).
53. Plaintiffs engaged in protected activities, including challenging workload assignments, participating in interviews where discriminatory comments were made, questioning the promotional process, and opposing discriminatory conduct, such as Harris filing a grievance for "out of title" pay related to performing Captain duties without promotion.
54. In retaliation, Defendants subjected Plaintiffs to adverse employment actions, including: denying promotions; reassignments such as Pease from Traffic Safety to patrol, Harris from Special Operations to a lesser office while continuing Captain duties without title or pay, and Dare to a basement office then to patrol; patrol transfers; marginalization through isolation; equipment removal; and removal of resources.
55. These actions were causally connected to Plaintiffs' protected activities, as they occurred shortly after the interviews, grievance, and discussions, and were motivated by Defendants' desire to pressure retirement-eligible officers to leave.
56. The individual Defendants contributed to the retaliation through their direct involvement in the discriminatory acts and failure to intervene.

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly and severally, for harm suffered as a result of Defendants' unlawful retaliation in violation of the New Jersey Law Against Discrimination as follows: (a) compensatory damages; (b) punitive damages; (c) attorneys' fees with appropriate enhancement under Rendine v. Pantzer, 141 N.J. 292 (1995); and

(d) such other relief as may be available pursuant to New Jersey Law Against Discrimination in which this court deems to be just and equitable.

COUNT IV – HOSTILE WORK ENVIRONMENT IN VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

57. Plaintiffs reallege and incorporate by reference the allegations contained in preceding paragraphs as if fully set forth herein.
58. The NJLAD prohibits the creation of a hostile work environment based on age. See N.J.S.A. 10:5-12(a).
59. Defendants created a hostile work environment through severe and pervasive conduct based on age and pension comments, pressure to retire, repeated marginalization, diminishing authority, and a public humiliation tone during interviews.
60. This conduct included ageist comments in formal interviews, rumors and statements at department events about not promoting "older" officers, bypassing senior Lieutenants for younger candidates, and contract provisions that disproportionately affected Plaintiffs and signaled they were unwanted due to age.
61. This conduct altered the terms and conditions of Plaintiffs' employment, creating an intimidating, hostile, and offensive workplace, and would be perceived as such by a reasonable person in Plaintiffs' position.
62. The individual Defendants contributed to the hostile environment through their direct involvement in the discriminatory acts and failure to intervene.

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly and severally, for harm suffered as a result of Defendants' hostile work environment in violation of the New Jersey Law Against Discrimination as follows: (a) compensatory damages; (b) punitive damages; (c)

attorneys' fees with appropriate enhancement under Rendine v. Pantzer, 141 N.J. 292 (1995); and (d) such other relief as may be available pursuant to New Jersey Law Against Discrimination in which this court deems to be just and equitable.

COUNT V – AIDING AND ABETTING IN VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

63. Plaintiffs reallege and incorporate by reference the allegations contained in preceding paragraphs as if fully set forth herein.
64. The NJLAD provides for individual liability against supervisors who aid, abet, incite, compel, or coerce the doing of any act forbidden by the NJLAD. See N.J.S.A. 10:5-12(e).
65. Defendants Mayor Wolfe, Chief McBride, Deputy Chief Burton, and Business Administrator DeHart (who was involved in decision-making) aided and abetted the age discrimination, disparate treatment, retaliation, and hostile work environment through their participation in the interview panels, promotion decisions, reassignments, and failure to address discriminatory comments and actions.
66. These individual Defendants knowingly and substantially assisted in the violations of the NJLAD, rendering them personally liable.
67. As a direct and proximate result of Defendants' violations of the NJLAD, Plaintiffs have suffered damages, including emotional distress, lost wages, benefits, and harm to their professional reputations and careers.

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly and severally, for harm suffered as a result of Defendants' aiding and abetting in violation of the New Jersey Law Against Discrimination as follows: (a) compensatory damages; (b) punitive damages; (c) attorneys' fees with appropriate enhancement under Rendine v. Pantzer, 141 N.J. 292 (1995); and

(d) such other relief as may be available pursuant to New Jersey Law Against Discrimination in which this court deems to be just and equitable.

COUNT VI – CONTINUING VIOLATION UNDER THE NEW JERSEY LAW AGAINST DISCRIMINATION

68. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.
69. The discriminatory, retaliatory, and harassing conduct described herein was not limited to isolated incidents, but instead constituted a continuing pattern and practice of unlawful conduct directed toward Plaintiffs because of their age and perceived proximity to retirement.
70. Beginning at least as early as August 2023, when Public Safety Director Rumpf referenced a preference for candidates who had "longevity left" in their careers, Defendants began demonstrating a preference for promoting younger officers rather than retirement-eligible officers such as Plaintiffs.
71. This discriminatory pattern continued through the promotional processes in late 2024 and throughout 2025, including the January 2025, February 2025, and June 2025 promotional cycles for Captain and other command staff positions.
72. During these processes, Defendants made repeated age-related comments during formal interviews, including references to Plaintiffs as "old," inquiries regarding retirement plans, and statements indicating that it would be foolish for an officer to remain employed after reaching pension eligibility.
73. Defendants ultimately selected substantially younger and less experienced candidates for promotion, including Lt. William Yorio, Lt. Michael Gabbianelli, and Sgt. Kevin Bielski,

while denying promotion to Plaintiffs despite their superior qualifications, experience, and tenure.

74. Following Plaintiffs' non-promotion, Defendants continued their discriminatory conduct through a series of adverse employment actions directed toward Plaintiffs.

75. Such actions included, but were not limited to, reassigning Plaintiff Dare from the Professional Standards Unit to an isolated basement administrative office and subsequently to the Patrol Division, while stripping him of duties and equipment previously required to perform his position.

76. Defendants also reassigned Plaintiff Pease from the Traffic Safety Bureau to patrol without explanation, removed his take-home vehicle, and imposed a counseling notice and other punitive measures that he had never previously received during his long and exemplary career.

77. Plaintiffs were further marginalized within the department through the reassignment of responsibilities to younger and less experienced officers, removal of resources and equipment, isolation from decision-making processes, and the creation of an environment intended to diminish their professional roles.

78. Defendants' discriminatory conduct also included the implementation of contract provisions and workplace practices designed to pressure retirement-eligible officers, including Plaintiffs, to retire within a narrow eligibility window or suffer economic penalties.

79. These actions were part of a broader effort by Defendants to replace older, retirement-eligible officers with younger personnel who had fewer years of service and less pension eligibility.

80. Defendants' conduct has continued into 2026, including ongoing marginalization, adverse assignments, and workplace conditions designed to pressure Plaintiffs to leave their employment due to their age.

81. The acts described herein are related components of a continuing and systemic pattern of discrimination, retaliation, and harassment directed toward Plaintiffs and other older officers within the Monroe Township Police Department.

82. Because Defendants' unlawful conduct constitutes a continuing violation of the New Jersey Law Against Discrimination, the statute of limitations does not bar recovery for discriminatory acts that occurred outside the limitations period but are part of the same ongoing pattern of discrimination and retaliation.

83. As a direct and proximate result of Defendants' continuing violations of the New Jersey Law Against Discrimination, Plaintiffs have suffered and continue to suffer economic losses, emotional distress, damage to their professional reputations, and harm to their careers.

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly and severally, for harm suffered as a result of Defendants' aiding and abetting in violation of the New Jersey Law Against Discrimination as follows: (a) compensatory damages; (b) punitive damages; (c) attorneys' fees with appropriate enhancement under Rendine v. Pantzer, 141 N.J. 292 (1995); and (d) such other relief as may be available pursuant to New Jersey Law Against Discrimination in which this court deems to be just and equitable.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all matters contained herein.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1, David E. Cassidy, Esq., are hereby designated as trial counsel for the within matter.

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1(b), the plaintiff hereby demands that the defendant provide answers to the uniform interrogatories as set forth in Form C of Appendix II of the rules Governing the Courts of the State of New Jersey.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to R. 4:10-2(b) demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Yes ( ) No ( )

If the answer is "yes" state the type of each policy for which coverage exists:

General Liability	Yes ( )	No ( )
Commercial	Yes ( )	No ( )
Umbrella	Yes ( )	No ( )
Excess	Yes ( )	No ( )
Othis	Yes ( )	No ( )

If the answer is "yes" attach a copy of each policy or, in the alternative, state under oath or certification the following:

(a) Policy Number
(b) Name and address of insurer or issuer
(c) inception and expiration dates
(d) names and addresses of all persons insured
(e) personal injury limits
(f) property damage limits
(g) medical payment limits
(h) name and address of person who has custody and possession thereof

(i) where and when each policy or agreement can be inspected and copied.

DEMAND TO PRESERVE EVIDENCE

All Defendant are hereby directed to preserve all physical and electronic information pertaining in any way to Plaintiff, to Plaintiff's cause of action and/or prayers for relief, and to any defenses to same, including, but not limited to, electronic data storage, closed circuit TV footage, digital images, computer images, cache memory, searchable data, emails, spreadsheets, employment files, memos, text messages, any and all online social or work related websites, entries on social networking sites (including, but not limited to, Facebook, Twitter, MySpace, etc.), and any of this information and/or data and/or things and/or documents which may be relevant to any claim or defense in this litigation.

CERTIFICATION PURSUANT TO R. 4:5-1

I certify, pursuant to R. 4:5-1, that the matter in controversy is not the subject of any of this action or arbitration proceeding, now or contemplated, and that no other parties should be joined in this action at this time.

Respectfully Submitted,

/s/ David E. Cassidy, Esq.
DAVID E. CASSIDY, ESQ.

Dated: March 17, 2026