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FILED
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 Superior Court of New Jersey JUN -3 2015
 TW MAY 29 2015 KENNETH J. GRISPIN, P.J.Cv.
 CIVIL CASE MANAGEMENT
 UNION COUNTY

NEW JERSEY FOUNDATION FOR
 OPEN GOVERNMENT, INC. and
 JOHN PAFF
 Plaintiffs,

 vs.

 SUMMIT HOUSING AUTHORITY
 and JOSEPH M. BILLY, JR.
 Defendants

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION, CIVIL PART
 UNION COUNTY

DOCKET NO. **UNN-L-1927-15**

VERIFIED COMPLAINT

Plaintiffs New Jersey Foundation for Open Government, Inc. ("the Foundation") and John Paff ("Paff"), by way of complaint against the Defendants Summit Housing Authority ("the Authority") and Joseph M. Billy, Jr. ("Billy") state as follows:

Preliminary Statement

1. This is an action under the Open Public Records Act, N.J.S.A. 47:1A-1 et. seq. (OPRA), common law right of access and the Senator Byron M. Baer Open Public Meetings Act, N.J.S.A. 10:4-6 et. seq. (OPMA).

Parties

2. Plaintiff New Jersey Foundation for Open Government, Inc. ("the Foundation") is a non-profit, New Jersey corporation which has as its mission to increase transparency in New Jersey's state, county and local governments.

3. Plaintiff John Paff ("Paff") is an individual who serves as Treasurer of the Foundation and who resides in Franklin Township, Somerset County, New Jersey. Paff is well known as an open government advocate, blogs frequently about open government issues¹ and often appears in the media² regarding his open government advocacy.

4. The Foundation and Paff are "any person" within the meaning of N.J.S.A. 10:4-16.

5. Defendant Summit Housing Authority ("the Authority") is a public body as that term is defined by N.J.S.A. 10:4-8(a) and a public agency as that term is defined by N.J.S.A. 47:1A-1.1.

¹ Among the blogs Paff authors is "New Jersey Open Government Notes" (<http://njopengovt.blogspot.com/>), "New Jersey Civil Settlements" (<http://njcivilsettlements.blogspot.com/>) and "Random Notes on NJ Government" (<http://njrandomgovt.blogspot.com/>)

² Some recent articles that have feature Paff's advocacy include "The 'transparency guru' of New Jersey," Philadelphia Inquirer, May 14, 2015 (http://articles.philly.com/2015-05-04/news/61771681_1_rogue-cops-john-paff-tax-money); "Profile: The Man Who Makes Sure Government Works -- Right Out in the Open," February 26, 2014 (<http://www.njspotlight.com/stories/14/02/26/profile-the-man-who-makes-sure-government-works-right-out-in-the-open/>); "Judge tells prosecutor to release letters about Wildwood Crest officers," Press of Atlantic City, May 11, 2015 (http://www.pressofatlanticcity.com/news/judge-tells-prosecutor-to-release-letters-about-wildwood-crest-officers/article_c7fad092-f82d-11e4-a301-afd1bf120c66.html); "Ex-fire commissioner says he was falsely accused of luring kids online, gets \$240K settlement," Star-Ledger, March 23, 2015 (http://www.nj.com/somerset/index.ssf/2015/03/former_franklin_fire_commissioner_settle_lawsuit_f.html) and "Fired Bound Brook High teacher wants her job back," Courier News, March 20, 2015 (http://www.mycentraljersey.com/story/news/local/somerset-county/2015/03/20/fired-bound-brook-high-teacher-wants-job-back/25099221?fb_action_ids=10152946873402562&fb_action_types=og.comments).

6. Defendant Joseph M. Billy, Jr. ("Billy") is the Authority's executive director and acted as the Authority's "custodian of a government record" as that term is defined by N.J.S.A. 47:1A-1.1 in relation to the requests made in this matter.

COMMON ALLEGATIONS

7. On or about April 9, 2015, Paff submitted a request (See attached Exhibit 1) under the Open Public Records Act and common law right of access to Billy requesting:

1. *The minutes of the Summit Housing Authority's three most recent non-public (i.e. executive or closed) sessions for which minutes are available either in full or in a redacted version.*
2. *The motions or resolutions, as required by N.J.S.A. 10:4-13, that authorized each nonpublic session for which minutes were furnished in response to #1 above.*
3. *The motions or resolutions, as required by N.J.S.A. 10:4-13, that authorized all nonpublic sessions that were held after the date of most recent of the nonpublic sessions for which minutes were furnished in response to #1 above.*

8. In an April 17, 2015 e-mail and e-mailed letter (Exhibit 2), Billy wrote:

In response to your recent request for documents under OPRA and the Common Law Right to Access Requests, please be advised that the regular monthly agenda for meetings of the Board of Commissioners of the Summit Housing Authority provides time for an Executive Session. The Board will motion and vote to enter into Executive Session, if needed, to discuss matters of litigation or personnel. Those sessions do not occur at each meeting, only when situations warrant. There are no pre-prepared resolutions authorizing entering into Executive Session.

Minutes of Executive Sessions are not maintained and therefore are unavailable.

I hope this satisfies your request.

9. The Authority passed a resolution on May 26, 2010 that, in accordance with N.J.S.A. 10:4-13, authorized a nonpublic meeting on that date. A copy of that resolution is attached as Exhibit 3.

10. The Authority held a nonpublic meeting on October 27, 2010. A copy of the minutes of that nonpublic meeting is attached as Exhibit 4.

11. According to minutes on-line at the Authority's web site (<http://summitnjha.org/>) the Authority held a nonpublic meeting on September 17, 2014. A copy of the first page of those minutes, which show that the Authority "went into Executive Session to discuss personnel and/or matters of litigation" is attached as Exhibit 5.

FIRST COUNT
(Violation of N.J.S.A. 47:1A-5)

12. Given the existence of minutes of the Authority's October 27, 2010 nonpublic meeting, Billy violated the OPRA by informing Paff that no records could be disclosed in response to ¶ 1 of Paff's April 9, 2015 request.

13. Given the existence of a) a resolution authorizing the Authority's May 26, 2010 nonpublic meeting and b) a September 17, 2014 motion to go into a nonpublic meeting, Billy violated the OPRA by informing Paff that no records could be disclosed in response to ¶¶ 2 and 3 of Paff's April 9, 2015 request.

WHEREFORE, Plaintiff Paff demands judgment:

A. Declaring that Billy, by failing to disclose any nonpublic minutes and motions/resolutions in response to Paff's April 9, 2015 request violated N.J.S.A. 47:1A-5(i).

B. Ordering Billy to promptly furnish Paff with the nonpublic minutes and motions/resolutions responsive to his April 9, 2015 request.

C. Awarding Paff a reasonable attorney fee and his costs of suit and

D. Such other relief as the Court deems equitable and just.

SECOND COUNT

(Requiring disclosure under common law)

14. Paff's and the public's interest in disclosure of the nonpublic minutes and motions/resolutions responsive to his April 9, 2015 request exceeds the governmental interest in keeping that information confidential.

WHEREFORE, Plaintiff Paff demands judgment:

E. Declaring that Billy, by failing to disclose any nonpublic minutes and motions/resolutions in response to Paff's April 9, 2015 request violated Paff's rights under the common law right of access.

F. Ordering Billy to promptly furnish Paff with the nonpublic minutes and motions/resolutions responsive to his April 9, 2015 request.

G. Awarding Paff a reasonable attorney fee and his costs of suit and

H. Such other relief as the Court deems equitable and just.

THIRD COUNT

(Insufficient nonpublic meeting motions/resolutions)

15. The motion passed at the Authority's September 17, 2014 meeting that purported to authorize a nonpublic session is not sufficiently specific to meet the

requirements of N.J.S.A. 10:4-13(a) and does not even attempt to meet the requirements of N.J.S.A. 10:4-13(b).

16. On information and belief, any other motions or resolutions that Billy, in accordance with the First and Second Counts of this Verified Complaint, will disclose in response to ¶¶ 2 and 3 of Paff's April 9, 2015 request will be similarly defective and noncompliant with N.J.S.A. 10:4-13.

WHEREFORE, Plaintiffs Foundation and Paff demand judgment:

I. Declaring that the Authority violated N.J.S.A. 10:4-13 by failing to a) pass sufficiently specific resolutions prior to going into its nonpublic meetings and b) comply with the requirements of N.J.S.A. 10:4-13(b).

J. Enjoining the Authority, going forward, from holding nonpublic meetings unless it first passes resolutions describing the topics to be privately discussed in as specifically and in as much detail as possible.

K. Enjoining the Authority, going forward, from holding nonpublic meetings unless it first passes resolutions stating "as precisely as possible, the time when and the circumstances under which the discussion conducted in closed session of the public body can be disclosed to the public."

L. Awarding the Foundation and Paff their costs.

M. Such other relief as the Court deems equitable and just.

FOURTH COUNT

(Failure to record and maintain nonpublic meeting minutes.)

17. Billy's admission, in his April 17, 2015 letter, that "[m]inutes of Executive Sessions are not maintained and are therefore unavailable" constitutes the

Authority's violation of N.J.S.A. 10:4-14 which requires that "reasonably comprehensible minutes of **all** its meetings" be maintained. (Emphasis supplied.)

WHEREFORE, Plaintiffs Foundation and Paff demand judgment:

N. Declaring that the Authority violated and is presently violating N.J.S.A. 10:4-14 by failing to record and maintain minutes of its nonpublic meetings.

O. Enjoining the Authority, going forward, from failing to record minutes of its future nonpublic meetings that are at least as comprehensible as the Authority's October 27, 2010 nonpublic meeting minutes.

P. Awarding the Foundation and Paff their costs.

Q. Such other relief as the Court deems equitable and just.

Designation of Trial Counsel

Plaintiffs designate Anthony H. Ogozalek, Jr. as trial counsel

Certification Pursuant to R.1:38-7(b)

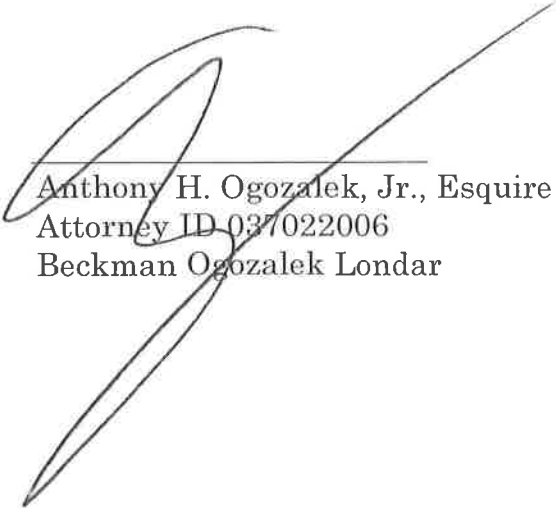
I certify that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future

Certification Of No Other Actions

Pursuant to R.4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. In addition, I recognize the continuing obligation of each party to file and serve

on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

Dated: May 28 2015



Anthony H. Ogozalek, Jr., Esquire
Attorney ID 037022006
Beckman Ogozalek Londar

Verification

John Paff, of full age, certifies as follows:

1. I am the Plaintiff who filed the records requests in this matter with the Summit Housing Authority and Joseph M. Billy, Jr. All of the facts stated in this Verified Complaint to which this Verification is attached are true, and as to those facts that are alleged on information and belief, I believe them to be true.

2. I further certify that the Exhibits attached to this Verified Complaint are exact copies of the originals and have not been altered.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 26 2015



John Paff

Exhibit 1



John Paff <opengovtissues@gmail.com>

Record Request to the Summit Housing Authority

1 message

John Paff <paff@pobox.com>

Thu, Apr 9, 2015 at 5:24 PM

To: jmbillyjr@summitnjha.org

Please accept this e-mail as my request under the Open Public Records Act (OPRA) and the common law right of access. Please send all responses and responsive records to me via e-mail to paff@pobox.com. Thank you.

Requested Records:

1. The minutes of the Summit Housing Authority's three most recent non-public (i.e. executive or closed) sessions for which minutes are available either in full or in a redacted version.
2. The motions or resolutions, as required by N.J.S.A. 10:4-13, that authorized each nonpublic session for which minutes were furnished in response to #1 above.
3. The motions or resolutions, as required by N.J.S.A. 10:4-13, that authorized all nonpublic sessions that were held after the date of most recent of the nonpublic sessions for which minutes were furnished in response to #1 above.

*John Paff
P.O. Box 5424
Somerset, NJ 08875
Voice: 732-873-1251
Fax: 908-325-0129
e-mail: paff@pobox.com*

Exhibit 2



John Paff <opengovtissues@gmail.com>

RE: Record Request to the Summit Housing Authority

1 message

Joseph <jmbillyjr@summitnjha.org>
To: John Paff <paff@pobox.com>

Fri, Apr 17, 2015 at 12:04 PM

Mr. Paff,

Attached please find our response to your recent request.

Sincerely,

JOSEPH M. BILLY, JR.

Executive Director

Housing Authority of the City of Summit

512 Springfield Avenue

Summit, N.J. 07901

(908) 273-6413

(908) 273-3618 fax

From: opengovtissues@gmail.com [mailto:opengovtissues@gmail.com] **On Behalf Of** John Paff

Sent: Thursday, April 09, 2015 5:24 PM

To: jmbillyjr@summitnjha.org

Subject: Record Request to the Summit Housing Authority

Please accept this e-mail as my request under the Open Public Records Act (OPRA) and the common law right of access. Please send all responses and responsive records to me via e-mail to paff@pobox.com. Thank you.

April 17, 2015

Dear Mr. Paff,

In response to your recent request for documents under OPRA and the Common Law Right to Access Requests, please be advised that the regular monthly agenda for meetings of the Board of Commissioners of the Summit Housing Authority provides time for an Executive Session. The Board will motion and vote to enter into Executive Session, if needed, to discuss matters of litigation or personnel. Those sessions do not occur at each meeting, only when situations warrant. There are no pre-prepared resolutions authorizing entering into Executive Session.

Minutes of Executive Sessions are not maintained and therefore are unavailable.

I hope this satisfies your request.

With best regards, I remain,

Sincerely yours,

Joseph M. Billy, Jr., Executive Director

Summit Housing Authority

Exhibit 3

RESOLUTION

Board Meeting Date

05-26-10

of the

SUMMIT HOUSING AUTHORITY

Date Submitted

RESOLUTION NO. 10-26-05-3

TITLE:

RESOLUTION TO GO INTO CLOSED SESSION TO DISCUSS POTENTIAL LITIGATION

Factual Contents Certified to by:

Budget Authorization Certified

to by: _____

Commissioner Poole Submitted the following Resolution:

WHEREAS, there is a need from time to time for the Housing Authority Board to go into closed session; and

WHEREAS, the Open Public Meetings Act allows a board to go into closed session to discuss potential litigation; and

WHEREAS, minutes of closed session business are taken and maintained separate from the minutes of the regular open public board meeting.

NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF SUMMIT:

1. That the minutes of the closed session shall become available to the public when the confidential nature of the matter is no longer deemed confidential or two years from the date of the meeting.
2. That this resolution shall be effective immediately.

Commissioner Halverstadt seconded the motion.

X – Indicates Vote

A.B. – Absent

N.V. – Not Voting

RECORD OF COMMISSIONERS VOTE ON FINAL PASSAGE									
COMMISSIONER	AYE	NAY	N.V.	A.B.	COMMISSIONER	AYE	NAY	N.V.	A.B.
Halverstadt	X				White	X			
Kuhn	X				Zazzera	X			
Poole	X				Zimmermann				X
Shung	X								

I Hereby Certify that the above Resolution was adopted at a Commissioners Meeting of the Housing Authority on

Secretary/ Executive Director

Exhibit 4

CLOSED SESSION OCTOBER 27, 2010

CLOSED SESSION: Mr. Riccio reported that as a result of Mr. Dang's appeal to Civil Service regarding his termination, he and Mr. Harrington met with a judge for mediation on Oct. 13, 2010. Mr. Riccio and Mr. Harrington first met with the judge alone, and later together with Mr. Dang and his attorney Mr. Katz. She recommended working together to come to an agreement. A settlement has been proposed by Mr. Katz including:

- Payment of \$50,000 to Mr. Dang
- Attorney fees of approximately \$10,000
- A neutral reference for Mr. Dang
- A reason for termination that will not compromise Mr. Dang's ability to collect unemployment
- Deferred pension
- Dismissal of the civil suit for back rent

Mr. Harrington advised that the Civil Service system is designed to protect the employee. Civil Service requires progressive discipline and termination is the Civil Service equivalent of the death penalty and should be avoided if at all possible. Mr. Harrington believes the judge is very pro-employee and would hold us to a very high standard for upholding Mr. Dang's termination. He also believes there is a sympathy factor when it comes to Mr. Dang's history. Mr. Harrington advised that agreeing to a settlement will be the only way for us to control the outcome and the timeline of the case. He also noted that he believed our odds for winning the case should it go to court would be 50/50.

The Board of Commissioners took a vote to decide if they would agree to a settlement. Commissioners Zimmerman, Poole, Halverstadt, and Kuhn voted in favor of a settlement and Commissioner Zazzera voted against it.

The Board of Commissioners would like Mr. Riccio and Mr. Harrington to try negotiating a settlement for less than \$50,000. Mr. Riccio noted that even if we come to an agreement on a settlement with Mr. Dang, HUD will still have to approve it.

A resolution was created to authorize Mr. Riccio and Mr. Harrington to negotiate a settlement with Mr. Dang.

Exhibit 5

MINUTES
SUMMIT HOUSING AUTHORITY
September 17, 2014

Commissioner Steven Spurr served as Acting Chairperson and called the meeting to order at 7:04 pm in the Janet Whitman Room in the Summit City Hall. The following Commissioners were present:

Commissioner Jeffrey Halverstadt, Commissioner Richard Poole, Commissioner Steven Spurr, and Commissioner Mary Zimmermann. Chairman Dennis White, Commissioner Pamela Kuhn, and Commissioner Coalter Pollock were absent. Also present were Joseph M. Billy, Jr., Executive Director, Michelle Salazar, Office Administrator and SHA Legal Counsel William Connelly.

Mr. Billy read the Open Public Meetings Act Notice, "Adequate notice of this of this meeting has been provided by the Secretary of the Housing Authority of the City of Summit by preparing an Annual Notice dated December 11, 2013, setting forth the date, time and place of this meeting. Said notice was filed with the Clerk of the City of Summit, and forwarded to newspapers of local circulation.

Mr. Billy led those in attendance in a salute to the flag.

THE MINUTES OF THE July 23, 2014 REGULAR BOARD MEETING: were tabled since there were not enough commissioners present to approve the minutes.

EXECUTIVE SESSION: Commissioner Poole moved and Commissioner Halverstadt seconded a motion to go into Executive Session to discuss personnel and/or matters of litigation that may or may not be acted upon.

Upon roll call, all members voted affirmative.

RETURN TO PUBLIC SESSION: Commissioner Poole moved and Commissioner Halverstadt seconded a motion to return to Public Session. Upon roll call all members voted in the affirmative.



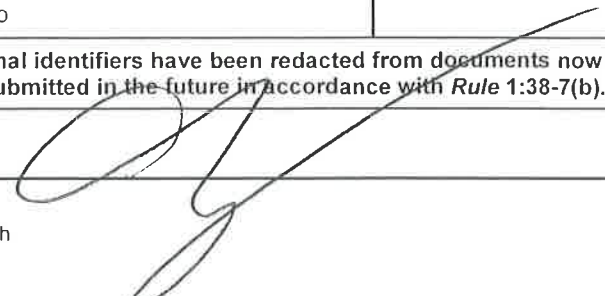
CHAIRPERSON'S REPORT: None.

REPORT OF THE EXECUTIVE DIRECTOR:

Mr. Billy updated the Board on the following topics:

- The Summer Senior BBQ was held on August 14, 2014. It turned out to be a beautiful day with about 75 attendees.
- The Summit Housing Authority is currently putting together their 5 year plan to be submitted to HUD.
- There have been two recent episodes of bed bugs at 12 Chestnut. Our exterminator was called in and they checked the surrounding units. All units were prepped and treated.

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY		
			PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA		
			CHG/CK NO.		
			AMOUNT:		
				OVERPAYMENT:	
				BATCH NUMBER:	
ATTORNEY / PRO SE NAME Anthony H. Ogozalek, Jr.		TELEPHONE NUMBER (856) 857-6262		COUNTY OF VENUE Union	
FIRM NAME (if applicable) Beckman Ogozalek Londar				DOCKET NUMBER (when available) UNN-L-1927-15	
OFFICE ADDRESS 7 Foster Ave., Suite 201 Gibbsboro, NJ 08026-1191				DOCUMENT TYPE Verified Complaint	
				JURY DEMAND <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) New Jersey Foundation for Open Government and John Paff, Plaintiffs		CAPTION NJFOG et al v. Housing Authority of the City of Summit et al			
CASE TYPE NUMBER (See reverse side for listing) 802	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.			
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS N/A			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN			
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.					
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION					
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS			
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION OPRA Case: Should be assigned to Hon. Camille M. Kenny, J.S.C. or appropriate judge assigned to handle OPRA matters.					
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION			
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?			
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).					
ATTORNEY SIGNATURE: 					



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE – PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE – PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE – PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT – OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| <ul style="list-style-type: none"> 271 ACCUTANE/ISOTRETINOIN 274 RISPERDAL/SEROQUEL/ZYPREXA 278 ZOMETA/ARELIA 279 GADOLINIUM 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL 282 FOSAMAX 285 STRYKER TRIDENT HIP IMPLANTS 286 LEVAQUIN 287 YAZ/YASMIN/OCELLA 288 PRUDENTIAL TORT LITIGATION | <ul style="list-style-type: none"> 289 REGLAN 290 POMPTON LAKES ENVIRONMENTAL LITIGATION 291 PELVIC MESH/GYNECARE 292 PELVIC MESH/BARD 293 DEPUY ASR HIP IMPLANT LITIGATION 295 ALLODERM REGENERATIVE TISSUE MATRIX 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS 297 MIRENA CONTRACEPTIVE DEVICE 601 ASBESTOS 623 PROPECIA |
|--|---|

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category Putative Class Action Title 59