

**ZAZZALI, FAGELLA, NOWAK,  
KLEINBAUM & FRIEDMAN**

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Attorneys for Plaintiffs

FRANCES GAIL MCCARTHY,  
LORRAINE REYNOLDS,  
SAURABH DANI,  
JAQUELINE HONE,  
ANNE LAGRANGE LOVING, and  
ELLEN MCNAMARA,

Plaintiffs

vs.

VILLAGE OF RIDGEWOOD,  
JOHN DOES 1-20, and  
ABC CORPORATIONS 1-20

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – BERGEN COUNTY  
DOCKET NO. BER-L-\_\_\_\_\_

**COMPLAINT**

Plaintiffs, Frances Gail McCarthy, Lorraine Reynolds, Saurabh Dani, Jaqueline Hone, Anne LaGrange Loving, and Ellen McNamara, by way of Complaint against Defendant, Village of Ridgewood, state as follows:

**INTRODUCTION**

1. Ever since Justice Brennan's opinion in *Citizens to Protect Pub. Funds v. Bd. of Educ. of Parsippany-Troy Hills Twp.*, 13 N.J. 172 (1953), it has been illegal for a New Jersey public entity to spend public money that promotes the adoption or

defeat of a referendum question, including advertising or advocacy directed to voters urging a “Yes” or a “No” vote on the referendum. Even purportedly neutral information that is nevertheless unfairly slanted for or against a referendum question is, in Justice Brennan’s words, “outside the pale.” Flouting over 60 years of precedent, the Village of Ridgewood, its Mayor, its Manager, and others, have placed political propaganda – a video and written material – on the municipal website expressly advocating a “YES” vote on a bond referendum to finance a parking deck, which is slated to go before Ridgewood voters on June 21, 2016. Through other advertising, they have urged voters to view this one-sided presentation. This action is brought to redress these violations of law.

### **PARTIES**

2. Plaintiffs Frances Gail McCarthy, Lorraine Reynolds, Saurabh Dani, Jaqueline Hone, Anne LaGrange Loving, and Ellen McNamara, are each residents, citizens, and registered voters of Ridgewood, New Jersey. They each pay property taxes that fund the municipal budget of Ridgewood, including the salaries and compensation of its mayor, council, employees and other professionals, and for the maintenance of the municipal website, <http://www.ridgewoodnj.net/>. In addition, as property taxpayers and payors of parking fees, Plaintiffs are likely to incur additional expenses in taxes and/or municipal parking fees should the referendum be adopted.

3. Defendant Village of Ridgewood (“Village”) is a municipal entity of the State of New Jersey, a “state actor,” and is capable of suing or being sued in its own

name. The Village is also responsible for the acts and omissions of its officials, officers, employees, agents, and representatives, herein complained of.

4. The fictitious party defendants represent individuals, business, and governmental entities who may be liable to Plaintiffs and/or affected by the relief sought in this Complaint.

### **FACTS**

5. For well over a year, the Plaintiffs have been advocating for a solution to parking in downtown Ridgewood that is aesthetically pleasing, fiscally responsible, and consistent with appropriate traffic management, planning and zoning practices. Ridgewood's government, in Plaintiffs' view, is unable to formulate a plan that meets even one, much less all three, of these criteria.

6. On or about March 23, 2016, the Council of the Village of Ridgewood ("Council") voted to adopt Bond Ordinance No. 3521 (the "Bond Ordinance"), to issue a \$11.5 million bond for financing the construction of a parking garage on Hudson Street in downtown Ridgewood.

7. On or about April 12, 2016, over 1,200 Ridgewood voters exercised their powers under N.J.S.A. 40:49-27 and filed a petition with the Municipal Clerk of Ridgewood objecting to, and seeking to block, the Bond Ordinance. The filing of the petition rendered the Bond Ordinance inoperative.

8. The Municipal Clerk thereafter certified the petition. This in turn triggered a referendum election on whether the Bond Ordinance should be adopted.

9. Under N.J.S.A. 40:49-10, the Council had the obligation to submit the

Bond Ordinance to the voters to determine if it should be adopted.

10. The Council had the option to submit the question at the November 2016 general election, in which case the expense for such election would have been borne by the County and the State. Instead, the Council specifically chose to submit the question to the Ridgewood voters at a special election, which under N.J.S.A. 19:45-5, required the municipality to bear the expenses of the election, estimated at approximately \$40,000.00.

11. Certain officials, officers, employees, agents, and representatives of the Village, among them, the individuals mentioned in Paragraph 13, have made an ideological, political and policy choice to favor the adoption of the Bond Ordinance. These same persons have also made an ideological, political and policy choice to urge voters to vote in favor of the Bond Ordinance at the June 21, 2016 referendum.

12. The persons described in the prior paragraph have engaged in conduct to further their ideological and political view that the Bond Ordinance referendum should pass. This includes expending, or causing to be expended, public money and public resources, including the time of public officials, to urge voters to cast a “Yes” vote on the referendum and/or giving a one-sided, slanted and unjust presentation of the issue. This conduct includes but is not limited to the following:

13. In or about June 2016, an 11-minute video was produced that expressly advocated a “Yes” vote on the referendum and/or which gave a one-sided, slanted and unjust presentation of the issue (the “Video”). Village Mayor Paul Aronsohn; Village Manager Roberta Sonenfeld; Village Engineer Chris Rutishauser; Village Chief

Financial Officer and Parking Utility Director Robert Rooney; Ken Schier; an architect retained by the Village; and Timothy Tracy, Executive Vice-President of Desman Design Management, which is under a contract financed by the Village to design the parking garage, all appeared in the Video.<sup>1</sup> The Video is viewable from <http://www.ridgewoodnj.net/project-full/423-hudson-street-parking-deck> (last visited June 14, 2016).

14. In or about June 2016, the Village created a “Parking Referendum Guide” expressly advocating a “Yes” vote on the referendum and/or which gave a one-sided, slanted and unjust presentation of the issue. The Parking Referendum Guide, in extravagant and dramatic language, argues in favor of the referendum’s passage, while disparaging the Plaintiffs. The Parking Referendum Guide is viewable at [http://www.ridgewoodnj.net/images/Ridgewood/Departments/Manager/Special Election Guide2.pdf](http://www.ridgewoodnj.net/images/Ridgewood/Departments/Manager/Special_Election_Guide2.pdf) (last visited June 14, 2016) and is attached as Exhibit A.

15. Since on or about June 9, 2016, both the Video and the Parking Referendum Guide have been available on the municipal website.

16. Public interest in the referendum is high. Directed to the municipal website by various forms of advertising, countless people have seen the Parking Referendum Guide, Video, and/or prior iterations of each.

17. On or about June 9, 2016, the Municipal Manager, utilizing her

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<sup>1</sup> When images of Mr. Aronsohn, Ms. Sonenfeld, Mr. Rutishauser, and Mr. Rooney appeared in the video, they were identified in subtitles with their official governmental titles, not as private citizens.

municipal email, sent an “e-notice” to village residents urging them to view the municipal website regarding the referendum, which website contained the one-sided, slanted presentation of, and express advocacy for, the referendum, namely, the Video and the Parking Referendum Guide identified above. The “e-notice” is attached as Exhibit B.

18. The Village of Ridgewood did not offer any opportunity to opponents of the referendum, such as Plaintiffs, to present facts, opinions or views in opposition to the adoption of the referendum in the Video and Parking Referendum Guide or in any comparable place or forum.

19. On or about June 13, 2016, a Complaint was lodged with the New Jersey Local Finance Board, alleging that the Video constituted a violation of the Local Government Ethics Law.

**COUNT I – DECLARATORY JUDGMENT, INJUNCTION  
AND ACCOUNTING**

20. Plaintiffs repeat and reallege Paragraphs 1-19 above as though fully set forth at length herein.

21. In *Citizens to Protect Pub. Funds v. Bd. of Educ. of Parsippany-Troy Hills Twp.*, 13 N.J. 172 (1953), Justice Brennan, at the time a member of the Supreme Court of New Jersey, authored an opinion holding that it was unlawful for a New Jersey public entity to expend public resources on exhortations to voters to vote for or against a referendum, or even on materials regarding a referendum that were less than fair or evenhanded:

[A] fair presentation of the facts will necessarily include all consequences, good and bad, of the proposal, not only the anticipated improvement[s] . . . but also the increased tax rate and such other less desirable consequences as may be foreseen. If the presentation is fair in that sense, the power to make reasonable expenditure for the purpose may fairly be implied . . . [Material that] fairly presents the facts as to need and the advantages and disadvantages of the [proposal], including the tax effect of its cost . . . [is a] reasonable expenditure . . .

[13 N.J. at 180].

22. Justice Brennan went on to explain that the public entity defendant in *Citizens* did not stop with a fair presentation of the facts. Instead,

[T]he defendant . . . was not content simply to present the facts. The exhortation 'Vote Yes' is repeated on three pages, and the dire consequences of the failure so to do are over-dramatized . . . In that manner the [entity] made use of public funds to advocate one side only of the controversial question without affording the dissenters the opportunity by means of that financed medium to present their side, and thus imperilled the propriety of the entire expenditure. The public funds entrusted to the board belong equally to the proponents and opponents of the proposition, and the use of the funds to finance not the presentation of facts merely but also arguments to persuade the voters that only one side has merit, gives the dissenters just cause for complaint. The expenditure is then not within the implied power and is not lawful in the absence of express authority from the Legislature.

It must be conceded that the electors of said city opposing said bond issue had an equal right to and interest in the funds in said power fund [sic] as those who favored said bonds. To use said public funds to advocate the adoption of a proposition which was opposed by a large number of said electors would be manifestly unfair and unjust to the rights of said [e]lectors, and the action of the [public entity] in so doing cannot be sustained . . .

The conduct of a campaign, before an election, for the purpose of exerting an influence upon the voters, is not the exercise of an authorized municipal function and hence is not a corporate purpose of the municipality.

[Id. at 180-81 (quotations omitted)].

23. Thus, spending public funds for debates between proponents and opponents, or evenhanded dissemination of material or broadcasts that present differing sides of a referendum is permissible. However, “It is the expenditure of public funds in support of one side only in a manner which gives the dissenters no opportunity to present their side which is outside the pale.” Id. at 182.

24. Justice Brennan concluded that “Simple fairness and justice to the rights of dissenters require that the use by public bodies of public funds for advocacy be restrained within those limits in the absence of a legislative grant in express terms of the broader power.” Id.

25. Upon information and belief, Defendant has received a qualified opinion of counsel indicating that its overt, one-sided advocacy in favor of the referendum, and the preparation and dissemination of the Video and the Parking Referendum Guide are lawful expenditures of public funds. Plaintiffs, in contrast, maintain that Defendant’s one-sided advocacy in favor of the referendum, and the preparation and dissemination of the Video and the Parking Referendum Guide are not lawful expenditures of public funds.

26. As such, an actual controversy on the propriety of the expenditure of public funds for the aforesaid purposes exists between and among the Plaintiffs and Defendant, entitling Plaintiffs to a declaratory judgment, and ancillary and further relief, under N.J.S.A. 2A:16-50 et seq.



WHEREFORE, Plaintiffs demand judgment in their favor and against Defendant:

A. Adjudging and declaring that Defendant's advocacy in favor of the referendum, including but not limited the exhibition and dissemination of the Video and the Parking Referendum Guide is an unlawful expenditure of public funds;

B. Enjoining Defendant from expending public funds for advocacy for the June 21, 2016 referendum or any subsequent vote on the same or similar subject matter;

C. Entering an order requiring Defendant to account for all time expended, public salaries or other sums paid, and public expenditures made to prepare and exhibit the Video, Parking Referendum Guide, and all other forms of advocacy that advocate a "Yes" vote on the referendum and/or which give a one-sided, slanted and unjust presentation of the issue; and

D. Awarding Plaintiffs such other and further legal and equitable relief as is just and proper.

### **COUNT II – ELECTION CONTEST**

27. Plaintiffs repeat and reallege Paragraphs 1-26 above as though fully set forth at length herein.

28. In the event the referendum is successful, its passage at the polls will have been procured by payments and expenditures that are contrary to law, and not authorized by the election or other laws of the State of New Jersey.

29. As such, Plaintiffs are entitled to judgment under N.J.S.A. 19:29-1(h)

and 19:29-8 setting aside the election, with the effect that the Bond Ordinance continues to be inoperative.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendant:

A. Annulling any vote in favor of the referendum, and declaring that the Bond Ordinance continues to remain inoperative and without legal effect; and

B. Awarding Plaintiffs such other and further legal and equitable relief as is just and proper.

Respectfully submitted,

**ZAZZALI, FAGELLA, NOWAK,  
KLEINBAUM & FRIEDMAN**


By: 

Flavio L. Komuves

Dated: June 14, 2016

**DESIGNATION OF TRIAL COUNSEL**

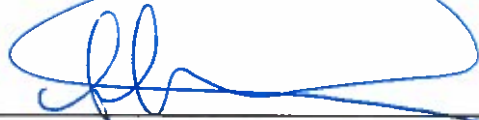
Flavio L. Komuves, Esq. is hereby designated as trial counsel for Plaintiffs.

  
Flavio L. Komuves

Dated: June 14, 2016

**CERTIFICATION PURSUANT TO RULE 4:5-1**

I, Flavio L. Komuves, hereby certify that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, and no such other action or arbitration proceeding is contemplated.



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Flavio L. Komuves

Dated: June 14, 2016

# Exhibit A

If You Want a Parking Deck at Hudson Street,  
Vote **YES** on Tuesday, June 21.

**SPECIAL ELECTION  
PARKING DECK  
VOTE**

**TUESDAY, JUNE 21**

*Learn More:* [www.RidgewoodNJ.net](http://www.RidgewoodNJ.net) or (201) 670-5500 x201

**A Guide to the June 21  
Parking Deck Referendum**

## Frequently Asked Questions

### **What will the June 21 referendum question say?**

*“Shall Ordinance No. 3521, submitted by referendum petition providing for the Council of the Village of Ridgewood to issue \$11,500,000 bonds or notes to finance the cost of constructing the Hudson Street parking deck, be adopted?”*

### **Does the referendum have anything to do with the size of the proposed parking deck?**

No. There is absolutely no language in the referendum – or in the ordinance it refers to – about the size or shape or look of the proposed parking deck. **This referendum is only about cost and location.**

### **Didn't we already vote on a Hudson Street parking deck referendum last November?**

Yes. On November 3, **Ridgewood voters overwhelmingly supported** – about 65% -- the financing and building of a parking deck at Hudson Street. That referendum, however, was non-binding and therefore did not have the force of law.

### **Didn't the Village Council vote on a Hudson Street parking deck in March?**

Yes. On March 23, the **Village Council unanimously (5-0) supported** an ordinance to bond up to \$11.5 million to finance and build a parking deck at Hudson Street.

### **So, if the public voted and the council voted, why are we having a special election on June 21?**

A small group of residents led a petition drive, which effectively forces the Village to put this issue (again) to a public referendum vote. The June 21<sup>st</sup> election, however, will be legally binding.

## Why does the bond ordinance estimate a cost of about \$11.5 million?

Last November's public referendum focused on a parking deck that would have at least 375 spaces at a cost of no more than \$15 million. Following many public discussions and consideration of different sizes and shapes, the Council agreed to a compromise parking deck that would have only 325 spaces at a cost of no more than \$11.5 million. That said, the next Council will make final decisions regarding size, shape, look, etc.

## Why is a parking deck important?

Three reasons: quality of life, public safety and the health, well-being of our downtown.

- **Quality of Life:** It will make life a whole lot easier for those of us who commute and/or shop and dine downtown. In fact, for Ridgewood train station commuters – which NJ Transit estimates to be over 1,700 riders per day – a parking deck could provide significant relief.
- **Public Safety:** A parking deck would decrease the number of people who drive around and around in circles – often increasingly angry and frustrated – looking for a parking spot.
- **Health, Well-Being of Our Downtown:** The number one challenge facing our local businesses is the scarcity of parking. For many, it's a matter of survival. And while this has been true for many years – and we have lost many businesses because of it – the fact is that the parking situation has reached crisis proportion. The evolution of our downtown to include more restaurants and more hair/nail salons – things you can't buy online and don't want to do at shopping malls – has increased the number of employees and the number of customers.

## How should I vote on June 21?

If you want a parking deck at Hudson Street, please vote **"YES!"**

If You Want a Parking Deck at Hudson Street,  
Vote **YES** on Tuesday, June 21.

For Our Residents...



For Our Businesses...



For Our Community!

Having Waited Nearly 90 Years for a Parking Deck,  
This is Literally a Chance of a Lifetime!

For More Information, Please Visit the Village Website at [www.ridgewoodnj.net](http://www.ridgewoodnj.net) or  
contact Mayor Paul Aronsohn at [paronsohn@ridgewoodnj.net](mailto:paronsohn@ridgewoodnj.net) .



# Exhibit B

From: Ridgewood Info <info@ridgewoodnj.net>  
Subject: Village of Ridgewood - E-Notice - June 21st Parking Referendum Vote -  
Thursday, 09 June 2016  
Date: June 9, 2016 at 2:09:20 PM EDT  
To: JAMES MACARTHY [REDACTED]  
Reply-To: Roberta Sonenfeld <rsonenfeld@ridgewoodnj.net>

*This email contains graphics, so if you don't see them, view it in your browser*

## **Village of Ridgewood E-Notice June 21st Parking Referendum Vote**

**Dear JAMES MACARTHY,**

Earlier this week, I sent an e-notice reminder to vote in this week's primary election. I also indicated that on June 21st there would be another election to determine whether or not to finance a parking deck at Hudson Street. There is background information on the website that you may want to consider while making your decision. Here is the link: [www.ridgewoodnj.net](http://www.ridgewoodnj.net)




Best,

Roberta Sonenfeld  
Village Manager  
201-670-5500, ext. 203

**-PLEASE SHARE THIS INFORMATION WITH YOUR NEIGHBORS-**

Not interested any more? *Unsubscribe*

**Appendix XII-B1**

	<h2 style="margin:0;">CIVIL CASE INFORMATION STATEMENT (CIS)</h2> <p style="margin:0;">Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> <b>Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed</b></p>		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 Flavio L. Komuves	TELEPHONE NUMBER (973) 623-1822	COUNTY OF VENUE Bergen <span style="float:right;">▼</span>
	FIRM NAME (if applicable) Zazzali Fagella Nowak Kleinbaum & Friedman		DOCKET NUMBER (when available)
	OFFICE ADDRESS 1 Riverfront Plaza, Suite 320 1037 Raymond Blvd. Newark, New Jersey 07102		DOCUMENT TYPE Complaint  JURY DEMAND <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
NAME OF PARTY (e.g., John Doe, Plaintiff) Frances Gail McCarthy, Lorraine Reynolds, Sarubh Dani, Jacqueline Hone, et al., Plaintiffs		CAPTION Frances Gail McCarthy, et al. v. Village of Ridgewood	
CASE TYPE NUMBER (See reverse side for listing)  999	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	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>			
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION  The case deals with an election scheduled for June 21, 2016 and may warrant accelerated treatment because of the emergent nature of the issues.			
 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 <i>Rule 1:38-7(b)</i> .			
ATTORNEY SIGNATURE:  6/15/2016			



# 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)  
Unlawful election expenditures; anticipated election contest.

### 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"> <li>271 ACCUTANE/ISOTRETINOIN</li> <li>274 RISPERDAL/SEROQUEL/ZYPREXA</li> <li>278 ZOMETA/AREDIA</li> <li>279 GADOLINIUM</li> <li>281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL</li> <li>282 FOSAMAX</li> <li>285 STRYKER TRIDENT HIP IMPLANTS</li> <li>286 LEVAQUIN</li> <li>287 YAZ/YASMIN/OCELLA</li> <li>288 PRUDENTIAL TORT LITIGATION</li> <li>289 REGLAN</li> </ul> | <ul style="list-style-type: none"> <li>290 POMPTON LAKES ENVIRONMENTAL LITIGATION</li> <li>291 PELVIC MESH/GYNECARE</li> <li>292 PELVIC MESH/BARD</li> <li>293 DEPUY ASR HIP IMPLANT LITIGATION</li> <li>295 ALLODERM REGENERATIVE TISSUE MATRIX</li> <li>296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS</li> <li>297 MIRENA CONTRACEPTIVE DEVICE</li> <li>299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR</li> <li>300 TALC-BASED BODY POWDERS</li> <li>601 ASBESTOS</li> <li>623 PROPECIA</li> </ul> |
|--|--|

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