

2784000

(14) 009 Defamation  
Jury X

Grant S. Ellis, Esq.  
**RINALDO AND RINALDO, ESQS.**  
60 Walnut Avenue, Suite 150  
Clark, New Jersey 07066  
Phone: (732) 388-9300  
Fax: (732) 388-9301  
*Attorneys for Plaintiff*

**RECEIVED / FILED**  
Superior Court of New Jersey  
**JAN 05 2012**  
CIVIL CASE MANAGEMENT  
UNION COUNTY

GERALD HATTON, individually, and  
LAURA HATTON, individually and as  
wife of Gerald Hatton,

Plaintiffs,

vs.

**COUNTY OF UNION, UNION COUNTY  
DEPARTMENT OF CORRECTIONAL  
SERVICES, WILLIAM BURKERT,**  
individually and in his official capacity;  
**KEVIN BURKERT**, individually and in his  
official capacity; **KENNETH BURKERT**,  
individually and in his official capacity;  
**BRIAN RIORDAN**, individually and in his  
official capacity,  
ABC CORPORATIONS 1-10 (fictitious  
names representing unknown entities),  
and JOHN/JANE DOES 1-20 (fictitious  
names representing unknown persons),

Defendants.

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

Docket No: UNNL 0084 12

Civil Action

**COMPLAINT AND JURY DEMAND**

84

Plaintiffs, GERALD HATTON and LAURA HATTON, his wife, residing in Union  
County, by way of Complaint against the Defendants, allege and say:

COMPUTER  
JAN 06 2012  
SECTION

**COUNT 1: Intentional infliction of emotional distress**

1. Plaintiff GERALD HATTON (“Mr. Hatton”) and Plaintiff LAURA HATTON (“Ms. Hatton”), husband and wife, live at 9 William Street, New Providence, New Jersey 07974. They are residents of the County of Union.
2. At all times herein concerned, Defendant COUNTY OF UNION, was a subdivision of the State of New Jersey and body politic; its headquarters and/or principal place of business is located at the County Administration Building at 10 Elizabethtown Plaza, Elizabeth, New Jersey.
3. Defendant UNION COUNTY DEPARTMENT OF CORRECTIONAL SERVICES is a Department and a Division and section of government Defendant COUNTY OF UNION.
4. Defendant COUNTY OF UNION and UNION COUNTY DEPARTMENT OF CORRECTIONAL SERVICES are together referred to as “UNION COUNTY” in this Complaint.
5. At the time of the Accident, Defendant UNION COUNTY was Plaintiff’s employer and was in full control and in operation of the Union County Jail Facility located in the City of Elizabeth, State of New Jersey, where incidents underlying this Complaint occurred.
6. Defendant BRIAN RIORDAN is the director of UNION COUNTY DEPARTMENT OF CORRECTIONAL SERVICES at all times relevant to the subject matter of

