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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

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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

