

THE SERRUTO LAW FIRM, P.C.
ATTORNEYS-AT-LAW

60 NORTHFIELD AVENUE — SUITE 2
WEST ORANGE, NEW JERSEY 07052

TEL: (973) 736-7373

FAX: (973) 736-7311

www.serrutolaw.com

ROGER A. SERRUTO+
DAVID WENDEL
LEONARD B. COHEN

+MEDIATOR SINCE 1997

SUZANNE M. ONETO
LITIGATION PARALEGAL
REAL ESTATE PARALEGAL

BONNIE E. BLACK
MATRIMONIAL PARALEGAL

Writer's email: dwendel@serrutolaw.com

June 28, 2013

VIA REGULAR & CERTIFIED MAIL, RRR

Office of County Counsel
Union county Administration Bldg., 5th Floor
Elizabethtown Plaza
Elizabeth, New Jersey 07207
Attn: Robert E. Barry, County Counsel

UNION COUNTY COUNSEL
RECEIVED

JUL 03 2013

ADMINISTRATION BUILDING
ELIZABETH, NJ

Re: **Germaine Johnson v. State of New Jersey, et als.**
Docket No.: UNN-L-001298-13

Dear Mr. Barry:

Please be advised, this firm represents the Plaintiff, Germaine Johnson, with respect to the above-referenced matter.

Enclosed please find the following:

1. Track Assignment Notice;
2. Summons;
3. CIS; and
4. Complaint and Jury Demand;

Please turn these documents over to your attorney for handling.

Very truly yours,



DAVID WENDEL

DW:so
Enclosures
cc: Germaine Johnson

THE SERRUTO LAW FIRM, P.C.
60 Northfield Ave., Suite 2
West Orange, NJ 07052
PH: (973) 736-7373
Fax: (973)746-7311
dwendel@serrutolaw.com
Attorney for Plaintiff,
Germaine Johnson

GERMAINE JOHNSON,

Plaintiff,

vs.

STATE OF NEW JERSEY, UNION
COUNTY COURTHOUSE, COUNTY
OF UNION, UNION COUNTY
SHERIFF'S DEPARTMENT, JOSEPH
A. BONAFIDE, ANTONIO
ANASTACIO, OFFICER ZUCOSKY,
MICHAEL FRANK, and LIEUTENANT
VILLADOS, and JOHN DOES 1-10
(said defendants being fictitious and
unknown),

Defendant.

SUPERIOR COURT OF NEW JERSEY
UNION COUNTY: LAW DIVISION

CIVIL ACTION

DOCKET NO.: UNN-L-001298-13

SUMMONS

THE STATE OF NEW JERSEY, TO THE DEFENDANT(S) NAMED ABOVE:

**Office of County Counsel
Union County Administration Bldg., 5th Floor
Elizabethtown Plaza
Elizabeth, New Jersey 07207
Attn: Robert E. Barry, County Counsel**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states that basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and Proof of Service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided. A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a

copy of your Answer or Motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Jennifer Perez

Jennifer Perez
Clerk of the Superior Court

Dated: June 28, 2013

Name of Defendant to be Served: County of Union

Address of Defendant to be Served: Office of County Counsel
Union County Administration Bldg., 5th Floor
Elizabethtown Plaza
Elizabeth, New Jersey 07207
Attn: Robert E. Barry, County Counsel

ATLANTIC COUNTY:

Lori Mooney, Clerk
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Kathleen A. Donovan, Clerk
119 Justice Center
10 Main St.
Hackensack, NJ 07601-7698
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Edward A. Kelly, Jr., Clerk
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:

Michael S. Keating, Clerk
1st Fl., Hall of Justice
101 S. Fifth Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 964-4520
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Angela F. Pulvino, Clerk
(Law Division Filings)
7 N. Main St., Box 203
Cape May Court House, NJ 08210
or
(General Equity Filings)
Box DN-209A
Cape May Court House, NJ 08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

MERCER COUNTY:

Albert E. Driver, Jr., Clerk
P.O. Box 8068
209 South Broad Street
Trenton, NJ 08650
LAWYERS SERVICE
(609) 890-6200
LEGAL SERVICES
(609) 695-6249

CUMBERLAND COUNTY:

Theresa L. Van Sant, Clerk
Court House, Direct Filing
Broad & Fayette Sts.
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 692-6207
LEGAL SERVICES
(856) 451-0003

ESSEX COUNTY:

Patricia McGarry Drake, Clerk
247 Hall of Records
465 Dr. Martin Luther King, Jr., Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-7753
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:

Joseph H. Hoffman, Clerk
First Fl., Court House
1 North Broad St, P.O. Box 129
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:

Frank E. Rodgers, Clerk
Superior Court, Civil Records Dept.
Brennan Court House
583 Newark Ave.
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Dorothy K. Tipok, Clerk
Hall of Records
71 Main Street
Flemington, NJ 08822
LAWYER REFERRAL
(908) 782-2600
LEGAL SERVICES
(908) 782-7979

MIDDLESEX COUNTY:

Herbert P. Lashomb, Clerk
Court House, East Wing
Lobby Floor
1 Kennedy Sq., P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:

Jane Clayton, Clerk
P.O. Box 1252
Court House, West Wing
Freehold, NJ 07728-1252
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:

Alfonse W. Scarbo, Clerk
P.O. Box 900
30 Schuyler Pl.
Morristown, NJ 07960
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:

M. Dean Haines, Clerk
119 Court House
CN-2191
Toms River, NJ 08754
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

William L. Kattak, Clerk
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 345-7171

WARREN COUNTY:

Terrance D. Lee, Clerk
Court House, Room 118
2nd and Hardwick Streets
Belvidere, NJ 07823
LAWYER REFERRAL
(908) 267-5882
LEGAL SERVICES --(908) 475-2010

SALEM COUNTY:

John W. Cawman, Clerk
92 Market St., P.O. Box 18
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 451-0003

SOMERSET COUNTY:

R. Peter Widin, Clerk
Civil/General Equity
New Court House, 3rd Fl.
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Helen C. Ackerman, Clerk
Superior Court, Law Division
49 High Street
Newton, NJ 07860
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Walter G. Halpin, Clerk
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

UNION COUNTY SUPERIOR COURT
2 BROAD STREET
ELIZABETH NJ 07207

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (908) 659-4817
COURT HOURS

DATE: APRIL 09, 2013
RE: JOHNSON VS NEW JERSEY STATE OF ET AL
DOCKET: UNN L -001298 13

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON KENNETH J. GRISPIN

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (908) 659-4823.

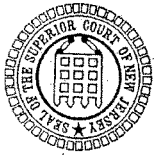
IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING. PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE WITH R.4:5A-2.

ATTENTION:

ATT: ROGER A. SERRUTO
SERRUTO & ASSOCIATES
60 NORTHFIELD AVENUE
WEST ORANGE NJ 07052

JUTAN

Appendix XII-B1



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial Law Division
Civil Part pleadings (not motions) under *Rule 4:5-1*
**Pleading will be rejected for filing, under *Rule 1:5-6(c)*,
if information above the black bar is not completed
or attorney's signature is not affixed.**

FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE: CK CG CA

CHG/CK NO.

AMOUNT:

OVERPAYMENT:

BATCH NUMBER:

ATTORNEY / PRO SE NAME

Roger A. Serruto, Esq.

TELEPHONE NUMBER

(973) 736-7373

COUNTY OF VENUE

FIRM NAME (if applicable)

The Serruto Law Firm, P.C.

DOCKET NUMBER (when available)

UNN-L-1298-13

OFFICE ADDRESS

60 Northfield Avenue
Suite 2
West Orange, NJ 07052

DOCUMENT TYPE

Complaint & Jury Demand

JURY DEMAND Yes No

NAME OF PARTY (e.g., John Doe, Plaintiff)

Germaine Johnson, Plaintiff

CAPTION

Germaine Johnson v. The State of New Jersey

CASE TYPE NUMBER (See reverse side for listing)

005

IS THIS A PROFESSIONAL MALPRACTICE CASE? YES 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?

Yes No

IF YES, LIST DOCKET NUMBERS:

DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)?

Yes No

NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known)

NONE
 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?

Yes No

IF YES, IS THAT RELATIONSHIP:

EMPLOYER/EMPLOYEE FRIEND/NEIGHBOR OTHER (explain)
 FAMILIAL BUSINESS

DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? Yes No

USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION



DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS?

Yes No

IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION

WILL AN INTERPRETER BE NEEDED?

Yes 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)
- 508 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

- 158 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

Centrally Managed Litigation (Track IV)

- | | |
|--|---|
| 285 STRYKER TRIDENT HIP IMPLANTS | 291 PELVIC MESH/GYNECARE |
| 288 PRUDENTIAL TORT LITIGATION | 292 PELVIC MESH/BARD |
| 289 REGLAN | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| | 623 PROPECIA |

Mass Tort (Track IV)

- | | |
|---------------------------------------|--|
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 271 ACCUTANE/ISOTRETINOIN | 282 FOSAMAX |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 284 NUVARING |
| 278 ZOMETA/AREDIA | 286 LEVAQUIN |
| 279 GADOLINIUM | 287 YAZ/YASMIN/OCELLA |
| | 601 ASBESTOS |

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

THE SERRUTO LAW FIRM, P.C.
60 Northfield Ave., Suite 2
West Orange, NJ 07052
PH: (973) 736-7373
Fax: (973)746-7311
dwendel@serrutolaw.com
Attorney for Plaintiff,
Germaine Johnson

RECEIVED / FILED
Superior Court of New Jersey

APR 08 2013

CIVIL CASE MANAGEMENT
UNION COUNTY

4/9 FEE ATTACHED
BATCH NO. 330

CHECK: CASH M.O. C.C.
PAYOR: Serruto
CHECK/CASH RECEIPT # 3169
AMOUNT \$ 200.

GERMAINE JOHNSON,
Plaintiff,

vs.

STATE OF NEW JERSEY, UNION
COUNTY COURTHOUSE, COUNTY
OF UNION, UNION COUNTY
SHERIFF'S DEPARTMENT, JOSEPH
A. BONAFIDE, ANTONIO
ANASTACIO, OFFICER ZUCOSKY,
MICHAEL FRANK, and LIEUTENANT
VILLADOS, and JOHN DOES 1-10
(said defendants being fictitious and
unknown),

Defendant.

SUPERIOR COURT OF NEW JERSEY
UNION COUNTY: LAW DIVISION

CIVIL ACTION

DOCKET NO.: 4NN-L-1298-13

COMPLAINT AND JURY DEMAND

JURY Civil Rights
CP
X

1298
Plaintiff, Germaine Johnson, residing at 354 15th Avenue, City of Newark, County
of Essex, State of New Jersey, by way of Complaint against the Defendants herein,
says as follows:

FIRST COUNT

1. At all times hereinafter mentioned, Plaintiff was and still is a resident of the
County of Essex, State of New Jersey.
2. On or about June 23, 2011, a Notice of Claim as required by law was served
upon Defendant, The State of New Jersey.

COMPUTER

APR 09 2013

SECTION

THE SERRUTO LAW FIRM, P.C.
60 Northfield Ave., Suite 2
West Orange, NJ 07052
PH: (973) 736-7373
Fax: (973)746-7311
dwendel@serrutolaw.com
Attorney for Plaintiff,
Germaine Johnson

GERMAINE JOHNSON,

Plaintiff,

vs.

STATE OF NEW JERSEY, UNION
COUNTY COURTHOUSE, COUNTY
OF UNION, UNION COUNTY
SHERIFF'S DEPARTMENT, JOSEPH
A. BONAFIDE, ANTONIO
ANASTACIO, OFFICER ZUCOSKY,
MICHAEL FRANK, and LIEUTENANT
VILLADOS, and JOHN DOES 1-10
(said defendants being fictitious and
unknown),

Defendant.

SUPERIOR COURT OF NEW JERSEY
UNION COUNTY: LAW DIVISION

CIVIL ACTION

DOCKET NO.:

COMPLAINT AND JURY DEMAND

Plaintiff, Germaine Johnson, residing at 354 15th Avenue, City of Newark, County of Essex, State of New Jersey, by way of Complaint against the Defendants herein, says as follows:

FIRST COUNT

1. At all times hereinafter mentioned, Plaintiff was and still is a resident of the County of Essex, State of New Jersey.
2. On or about June 23, 2011, a Notice of Claim as required by law was served upon Defendant, The State of New Jersey.

3. At all times hereinafter mentioned, Defendant, Union County Courthouse, was a subdivision of the Defendant, State of New Jersey.
4. On or about June 23, 2011, a Notice of Claim as required by law was served upon the County of Union.
5. On or about June 23, 2011, a Notice of Claim as required by law was served upon Defendant, the Union County Sheriff.
6. At all times hereinafter mentioned, Defendants, Joseph Bonafide, Antonio Anastacio, Officer Zucosky, Michael Frank, Lieutenant Villados and John Does 1-10 (said defendants being fictitious and unknown) were acting within the course and scope of their authority and/or under the charge and control of the Defendant, County of Union and/or the Union County Sheriff's Office.
7. On or about April 6, 2011, at approximately 8:30 a.m. and thereafter, the Defendants -- State of New Jersey, Union County Courthouse, County of Union and Union County Sheriff's Office and their agents, servants and employees set forth herein -- did willfully and maliciously assault and beat the Plaintiff herein, and did strike him repeatedly on the head, body and limbs and inflicted upon him the injuries hereinafter set forth.
8. As a result thereof, the Plaintiff, Germaine Johnson, was injured.
9. Said incident and the injuries arising therefrom were caused through and by the reason of the negligence and carelessness of the Defendants -- State of New Jersey, Union County Courthouse, County of Union, Union County Sheriff and its agents and employees.

10. By reason of the foregoing, Plaintiff, Germaine Johnson, was rendered sick, sore, lame and disabled and his injuries are of a permanent nature and character; that by reason thereof the Plaintiff was incapacitated from pursuing his usual tasks and duties, and he will in the future be incapacitated from pursuing his usual tasks and duties, and the Plaintiff has become obligated, and will, in the future, become obligated for medicines, medical care and aid, hospitalization and attention in an effort to alleviate his pain and suffering.

WHEREFORE, Plaintiff, Germaine Johnson, hereby demands judgment against the State of New Jersey, Union County Courthouse, County of Union, Union County Sheriff, Joseph Bonafide, Antonio Anastacio, Officer Zucosky, Michael Frank, Lieutenant Villados and John Does 1-10 (said defendants being fictitious and unknown), for compensatory damages, punitive damages, attorneys' fees, interest, costs of suit, and such other and further relief.

SECOND COUNT

11. Plaintiff repeats and realleges each and every paragraph of the preceding counts as if more fully set forth at length herein.

12. Shortly after brutally assaulting and beating Plaintiff, Germaine Johnson, Defendants -- State of New Jersey, Union County Courthouse, County of Union, Union County Sheriff, Joseph Bonafide, Antonio Anastacio, Officer Zucosky, Michael Frank, Lieutenant Villados and John Does 1-10 (said defendants being fictitious and unknown), arrested and detained Plaintiff against his will without proper legal authority, legal justification, or probable cause.

13. As a direct result, said Defendants are liable on this additional cause for damages as permitted pursuant to law.

WHEREFORE, Plaintiff, Germaine Johnson, hereby demands judgment against the Defendants -- State of New Jersey, Union County Courthouse, County of Union, Union County Sheriff, Joseph Bonafide, Antonio Anastacio, Officer Zucosky, Michael Frank, Lieutenant Villados and John Does 1-10 (said defendants being fictitious and unknown) -- jointly and severally, for compensatory damages, punitive damages, interest, attorneys' fees, costs of suit, and such other and further relief as this Court shall deem just and proper.

THIRD COUNT

14. Plaintiff, Germaine Johnson, hereby repeats and realleges each and every paragraph of the preceding counts as if more fully set forth at length herein.

15. Germaine Johnson is a citizen of New Jersey and is in entitled to protection, including reimbursement for damages from a governmental body, where the governmental body subjected the citizen to potentially unfair treatment, such as oppression, harassment, or egregious deprivation.

16. As a direct result, said Defendants are liable on this additional cause for damages as permitted pursuant to law.

WHEREFORE, Plaintiff, Germaine Johnson, hereby demands judgment against the Defendants --, State of New Jersey, Union County Courthouse, County of Union, Union County Sheriff, Joseph Bonafide, Antonio Anastacio, Officer Zucosky, Michael Frank, Lieutenant Villados and John Does 1-10 (said defendants being fictitious and unknown) -- jointly and severally, for compensatory damages, punitive damages,

interest, attorneys' fees, costs of suit, and such other and further relief as this Court shall deem just and proper.

FOURTH COUNT

17. Plaintiff, Germaine Johnson, hereby repeats and realleges each and every paragraph of the preceding counts as if more fully set forth at length herein.

18. The Defendants and the Plaintiff are subject to the Constitution of New Jersey and the Defendants are liable in tort for damages for violating said rights under said Constitution.

19. As a direct result, said Defendants are liable on this additional cause for damages as permitted pursuant to law.

WHEREFORE, Plaintiff, Germaine Johnson, hereby demands judgment against the Defendants -- State of New Jersey, Union County Courthouse, County of Union, Union County Sheriff, Joseph Bonafide, Antonio Anastacio, Officer Zucosky, Michael Frank, Lieutenant Villados and John Does 1-10 (said defendants being fictitious and unknown) -- jointly and severally, for compensatory damages, punitive damages, interest, attorneys' fees, costs of suit, and such other and further relief as this Court shall deem just and proper.

FIFTH COUNT

20. Plaintiff, Germaine Johnson, hereby repeats and realleges each and every paragraph of the preceding counts as if more fully set forth at length herein.

21. Upon information and belief, the Defendants illegal and unlawful search, arrest, detainment, assault and imprisonment of the Plaintiff's body/person, was illegal, unreasonable, reckless, without a warrant nor probable cause,

and was a violation and deprivation of the Constitutional rights of the Plaintiff as secured by the Fourth and Fourteenth Amendments of the Constitution of the United States, 42 U.S.C. Section 1983 and 42 U.S.C. Section 1988.

22. As a direct result, said Defendants are liable on this additional cause for damages as permitted pursuant to law.

WHEREFORE, Plaintiff, Germaine Johnson, hereby demands judgment against the Defendants -- State of New Jersey, Union County Courthouse, County of Union, Union County Sheriff, Joseph Bonafide, Antonio Anastacio, Officer Zucosky, Michael Frank, Lieutenant Villados and John Does 1-10 (said defendants being fictitious and unknown) -- jointly and severally, for compensatory damages, punitive damages, treble damages, interest, attorneys' fees, costs of suit, and such other and further relief as this Court shall deem just and proper.

THE SERRUTO LAW FIRM, P.C.
Attorneys for Plaintiff

Dated: April 5, 2013

By:



ROGER A. SERRUTO, ESQ.

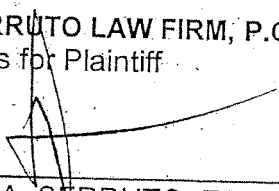
JURY DEMAND

Plaintiff, Germaine Johnson, demands a trial by jury on all triable issues of the Complaint.

THE SERRUTO LAW FIRM, P.C.
Attorneys for Plaintiff

Dated: April 5, 2013

By:

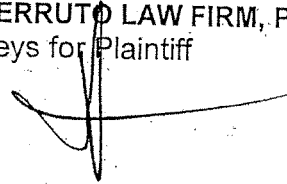


ROGER A. SERRUTO, ESQ.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Roger A. Serruto, Esq., is hereby designated as trial counsel on behalf of the Plaintiff in the within matter.

THE SERRUTO LAW FIRM, P.C.
Attorneys for Plaintiff



Dated: April 5, 2013

By:

ROGER A. SERRUTO, ESQ.

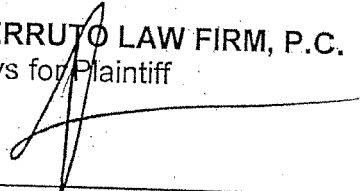
CERTIFICATION PURSUANT TO R. 4:5-1

I 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 further certify that no other action or arbitration proceeding is contemplated and no other parties are known to be necessary at this time.

THE SERRUTO LAW FIRM, P.C.
Attorneys for Plaintiff

Dated: April 5, 2013

By:



ROGER A. SERRUTO, ESQ.



COUNTY OF UNION

Part C - GOVERNMENT RECORDS REQUEST RESPONSE

Requestor: Tina Renna - UAWA

Request Date: 7/29/13

- Document(s) provided: one e-file pages, at a total cost of: no fee. Complaint titled: Germaine Johnson v. County of Union, et al
- Special Service Charge imposed - Reason: _____
- Document(s) have been inspected by the requestor on the date shown below: _____ documents, _____ total pages
- Document(s) not provided (see below)

The document(s) you have requested that are checked below are NOT being provided because the document(s) are considered privileged or are otherwise exempt from public access, as provided by applicable law:

Privileged or Protected Category	Authority for Denial or Redaction
<input type="checkbox"/> Advisory, Consultative or Deliberative material	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Autopsy Photos / Video	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Attorney-Client Privilege Information	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Computer Security Information	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Criminal Investigatory Records	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Credit Card Numbers	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Domestic Security (Sabotage or Terrorism)	Executive Order 21 (McGreevey)
<input type="checkbox"/> Grievance Information with public employer	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Drivers' License Numbers	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Electronic Surveillance Materials	N.J.S.A. 2A:156A-19
<input type="checkbox"/> Emergency or Security Information or Procedures	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Employee Sexual Harassment Complaints	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Fingerprint Cards	Executive Order 9 (Hughes)
<input type="checkbox"/> Individual's Medical, Financial, or Tax records	Executive Order 26 (McGreevey)
<input type="checkbox"/> Insurance Communications	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Investigation in Progress	N.J.S.A. 47:1A-3.a
<input type="checkbox"/> Labor Negotiation Information (strategy or positions)	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Personnel or Pension Records	N.J.S.A. 47:1A-10
<input type="checkbox"/> Photographs of Crime Scene	Executive Order 9 (Hughes)
<input type="checkbox"/> Proprietary Information	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Reasonable Expectation of Privacy	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Resumes of unsuccessful applicants	Executive Order 26 (McGreevey)
<input type="checkbox"/> Safety of persons or the public	Executive Order 69 (Whitman)
<input type="checkbox"/> Security Measures and Surveillance Techniques	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Social Security Numbers	N.J.S.A. 47:1A-1.1, et seq.
<input type="checkbox"/> Test Questions, Scoring Keys, or other Exam Data	Executive Order 26 (McGreevey)
<input type="checkbox"/> Victim records	N.J.S.A. 47:1A-1.1; N.J.S.A. 2A:82-46b
<input type="checkbox"/> Record has been destroyed/not retained pursuant to:	Records Retention and Disposition Schedule
<input type="checkbox"/> Other	

You have a right to appeal this decision that the documents requested are not accessible. You may take your appeal to the Government Records Council (GRC) or to the New Jersey Superior Court as provided by N.J.S.A. 47:1A-6 and 7. Please see the attached "Part D- Procedures to Challenge Denial of Access to Government Records" and GRC information.

Date: 7/31/13

MJ
County Official

ACKNOWLEDGMENT

I hereby acknowledge that I have received copies of, or have been permitted to view/inspect, the documents requested except for any documents specifically listed above on which a determination has been made that the documents could not be provided in accordance with applicable law. If any documents have not been provided, I have received information as to the procedures for an appeal of the determination.

Date: _____

Requestor's Signature _____