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Attorneys for Plaintiff, SILVIA WILCOX, individually, and as *Administratrix ad Prosequendum*  
of the ESTATE OF ADDISON WILCOX,

SILVIA WILCOX, individually, and as  
*Administratrix ad Prosequendum* of the  
ESTATE OF ADDISON WILCOX,

Plaintiff,

vs.

COUNTY OF UNION, UNION  
COUNTY JAIL, UNION COUNTY  
SHERIFF'S DEPARTMENT, SHERIFF  
RALPH E. FROEHLICH, ABC  
CORPS. 1-20 (fictitious names, true  
names unknown), and JOHN DOES 1-  
25 (fictitious names, true names  
unknown),

Defendants.

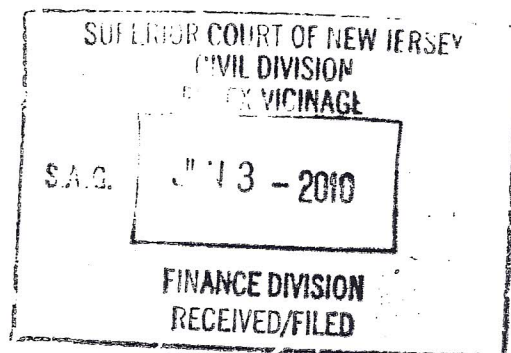
SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: UNION COUNTY  
DOCKET NO:

CIVIL ACTION

COMPLAINT AND JURY DEMAND

3479-10



Plaintiff, SILVIA WILCOX, residing at 63 Skylar Avenue, City of Newark, County of  
Essex, State of New Jersey, personal representative of the ESTATE OF ADDISON WILCOX,  
deceased, and *Administratrix ad Prosequendum* for ADDISON WILCOX, deceased,  
complaining of the Defendants alleges as follows:

**PLAINTIFFS**

1. **Addison Wilcox.** Addison Wilcox, now deceased, was at all times relevant herein a resident  
of the City of Hillside, County of Union, State of New Jersey, at the time of his death.

