

**RICHARD L. KUHRT, LLC**  
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Attorneys for Plaintiff

UNION COUNTY COUNSEL  
RECEIVED  
APR - 1 2013  
ADMINISTRATION BUILDING  
ELIZABETH, NJ

Plaintiff,  
Fabiola Suarez.

:SUPERIOR COURT OF NEW JERSEY  
:LAW DIVISION: UNION COUNTY  
:  
:DOCKET NO:

vs.

CIVIL ACTION

Defendant,  
Kelvin A. Peralta, Yunio R. Rodriguez,  
Vincent T. Quinn, Jr., Union County,  
John Doe, (a fictitious name for  
an unknown and unquantified group  
of individuals), ABC Corp., (a  
fictitious name for an unknown and  
unquantified group of partnerships,  
corporations and/or other entities)

**COMPLAINT AND JURY DEMAND**

RECEIVED/FILED  
Superior Court of New Jersey

MAR 07 2013

CIVIL CASE MANAGEMENT  
UNION COUNTY

UNN-L-0865-13

Plaintiff, Fabiola Suarez, residing at 1263 Clinton Place, Apt. B8, Elizabeth, Union County, New Jersey, by way of complaint against the defendants says:

1. On or about 5/9/11, the plaintiff, Fabiola Suarez, was the owner and operator of a motor vehicle which was traveling on W. Grand Street at or near its intersection with Cherry Street in Elizabeth, Union County, New Jersey and at all times relevant hereto the foreseeable plaintiff was operating her motor vehicle in a reasonably safe manner.

employee of Union County was the operator of a motor vehicle owned by Union County and said defendant was operating his motor vehicle directly behind that vehicle being operated by Kelvin A. Peralta and was proceeding on W. Grand Street at or near its intersection with Cherry Street in Elizabeth, Union County, New Jersey and at all times relevant hereto said defendant did owe certain duties and obligations to the foreseeable plaintiff including but not limited to operating his motor vehicle in a reasonably safe manner and making proper observations.

4. At the aforementioned place and time, the defendants, Kelvin A. Peralta, Yunio R. Rodriguez, Vincent T. Quinn, Jr. and Union County did operate their motor vehicles in a careless and negligent manner and did fail to make proper observations and did otherwise breach the duties and obligations owed to the foreseeable plaintiff as a result of which they caused their motor vehicles to collide striking the plaintiff's vehicle and causing severe injuries, damage and property damage.

4. As a result of the aforementioned carelessness and negligence, the plaintiff, Fabiola Suarez was caused to suffer severe and permanent personal injuries; was caused to suffer and will in the future be caused to suffer great pain and anguish; was caused to seek and will in the future be caused to seek medical and hospital treatment; was caused to expend or incur and will in the future be caused to expend or incur monies in an effort to treat her injuries; was caused to lose time from and will in the future be caused to lose time from her usual activities, pursuits and occupation; did suffer permanent injury and was otherwise caused to suffer injuries and

cost of suit.

**JURY DEMAND**

Plaintiff hereby demands a trial by Jury as to all issues herein.

**DEMAND FOR INTERROGATORIES**

Plaintiff hereby demands answers to Uniform Interrogatories Form C & C1.

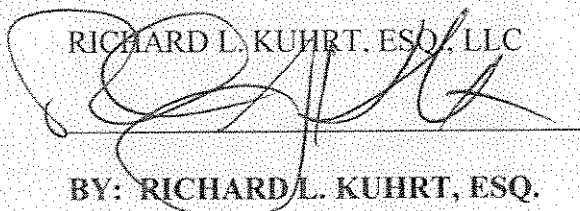
**DEMAND FOR DISCOVERY OF INSURANCE INFORMATION**

Pursuant to Rule 4:10-2(b), demand is hereby made that you disclose to Plaintiff's attorney whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part of all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

**DESIGNATION OF TRIAL COUNSEL**

Plaintiff designates Richard L. Kuhrt, Esq. as Trial Counsel pursuant to Rule 4:25-4.

RICHARD L. KUHRT, ESQ., LLC

A handwritten signature in black ink, appearing to read 'Richard L. Kuhrt', is written over a horizontal line. The signature is stylized and somewhat cursive.

BY: RICHARD L. KUHRT, ESQ.

DATED:

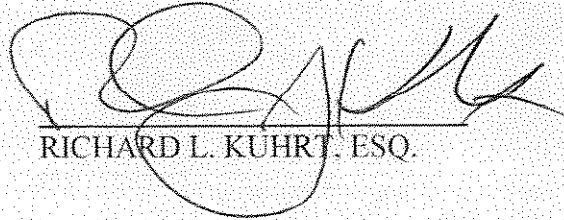
2/27/13

### CERTIFICATION

1. I am an Attorney at Law of the State of New Jersey, attorney for plaintiff(s) in the within action.

2. Pursuant to Rule 4:5-1, the matter in controversy is not the subject of any action pending in any other Court or of a pending arbitration proceeding.

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



RICHARD L. KUHRT, ESQ.

DATED: 2/27/13