

BREUNINGER & FELLMAN
ATTORNEYS AT LAW
1829 FRONT STREET
SCOTCH PLAINS, NEW JERSEY 07076

826 WASHINGTON STREET - SUITE B
HOBOKEN, NEW JERSEY 07030

(908) 490-9900

Facsimile: (908) 490-9950

SUSAN B. FELLMAN (NJ & MICH)
E-mail: sfellman@comcast.net

June 24, 2014

Via Overnight Courier
Superior Court of New Jersey
Union County Courthouse
2 Broad Street
Elizabeth, New Jersey 07207

Attn: Clerk - Law Division

RE: Richmond Lapolla vs. County of Union, et als
Docket No. UNN-L-003547-11
Motion Returnable: July 11, 2014

Dear Sir/Madam:

This office represents the Plaintiff in the above referenced matter.

Enclosed please find an original and one copy of the following:

1. Notice of Motion For Leave to File a Second Amended Complaint;
2. Certification of Susan B. Fellman, Esq. with Proposed Second Amended Complaint
3. Proposed Order Granting Leave to File Second Amended Complaint.

Also enclosed is a check in the amount of \$30.00, the cost to file this Motion, together with a Proposed Order and self-addressed envelope for the return of the executed Order.

Thank you for your attention in this matter.

Very truly yours,


SUSAN B. FELLMAN

SBF/ml
w/enc.

OVERNIGHT COURIER (w/enc.)
cc: Robert Renaud, Esq.
Robert Varady, Esq.

BREUNINGER & FELLMAN
Attorneys at Law
1829 Front Street
Scotch Plains, New Jersey 07076
(908) 490-9900
Attorneys for Plaintiff

RICHMOND LAPOLLA

Plaintiff,

v.

COUNTY of UNION; GEORGE
DEVANNEY, County Manager and
individually;

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - UNION COUNTY
DOCKET NO.: UNN-L-003547-11**

Civil Action

**NOTICE TO MOTION FOR LEAVE
TO FILE A SECOND AMENDED
COMPLAINT**

TO: Robert F. Varady, Esq.
La Corte, Bundy, Varady & Kinsella
989 Bonnel Court
Union, NJ 07083
Counsel for Defendant County of Union

Robert F. Renaud, Esq.
Palumbo & Renaud
190 North Avenue East
Cranford, NJ 07016
Counsel for Defendant George Devanney

PLEASE TAKE NOTICE that on Friday, **July 11, 2014**, at 9:00 in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Richmond Lapolla, shall move before the Superior Court of New Jersey, Law Division, Union County Court House, Elizabeth, New Jersey, for an Order pursuant to New Jersey Rules of Court 1:6-2 and 4:9-1, 4:26-4 for Leave to File a Second Amended Complaint adding a Third Count for Retaliation for Filing a Lawsuit asserting his rights under the New Jersey Civil Rights Act.

PLEASE TAKE FURTHER NOTICE that in accordance with R. 1:6-2(d) the undersigned shall rely on the Certification of Susan B. Fellman, Esq., annexed hereto in support hereof.

A proposed form of Order is submitted.

I hereby certify that the original of this Notice of Motion has been filed with the Clerk of Union County by overnight mail and a copy has been served on all counsel of record by overnight mail.

Pursuant to R. 1:6-2(d), the undersigned:

Requests oral argument if opposition is filed.

BREUNINGER & FELLMAN

By: 
SUSAN B. FELLMAN
Attorneys for Plaintiff

Dated: June 24, 2014

Arbitration Date: None

Discovery End Date: July 15, 2014

Trial Date: October 16, 2014

BREUNINGER & FELLMAN
Attorneys at Law
1829 Front Street
Scotch Plains, New Jersey 07076
(908) 490-9900
Attorneys for Plaintiff

RICHMOND LAPOLLA

Plaintiff,

v.

COUNTY of UNION; GEORGE
DEVANNEY, County Manager and
individually;

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - UNION COUNTY
DOCKET NO.: UNN-L-003547-11**

Civil Action

**CERTIFICATION OF COUNSEL
IN SUPPORT OF MOTION
FOR LEAVE TO FILE A SECOND
AMENDED COMPLAINT**

I, SUSAN B. FELLMAN, hereby certify as follows:

1. I am an Attorney at Law in the State of New Jersey and a partner with the law firm of Breuninger & Fellman and represent the Plaintiff, Richmond Lapolla, in the above entitled matter. I am fully familiar with this matter and make this Certification in support of Plaintiff's Motion for Leave to file a Second Amended Complaint alleging a Count for Retaliation for filing a lawsuit asserting rights under the New Jersey Civil Rights Act.

2. In September, 2011, Plaintiff filed this Complaint and Amended Complaint in which he alleged political retaliation in violation of N.J.S.A. 10:6-1 as a result of which Plaintiff was transferred to a position at the Union County Vocational School and thereafter to the Union County Juvenile Detention Center. In November, 2011, Plaintiff was transferred to the Watchung Stables where he remains to the present time. In this position, although Plaintiff receives a considerable salary, he has no meaningful duties to perform.

3. In September, 2013, Plaintiff became aware that the position of Division Head in the Department of Facilities Management, a position that he held for many years, had become vacant. Plaintiff made a request that he be given this position, restoring him to his rightful civil service job.

4. In February, 2014, Plaintiff learned that the position was being posted. (See Exhibit C to Proposed Second Amended Complaint, posting for vacancy for County Division Head, Division of Facilities Management).

5. Plaintiff timely applied for the position and was interviewed. Based on information and belief, due to his Civil Service title, Director Repair and Maintenance (see Exhibit A to the Proposed Second Amended Complaint), his experience performing the duties of the position for the County, Plaintiff was the most qualified individual for this position and as he repeatedly advised the decision makers, giving him the job would save the County a considerable amount of money.

6. On June 10, 2014, Plaintiff learned that another County employee had been selected by the Defendant County of Union to fill the position and that he was starting in the position that day.

7. Plaintiff made an OPRA request for information about the candidates and the candidate selected by Defendant. Information he just received pursuant to his OPRA request indicates that the successful candidate has a Civil Service Title of carpenter and is receiving a salary of \$88,000 per year. Further, based on information and belief, the individual selected has no administration nor supervisory experience, and as such, does not meet the minimum requirements set forth in the posted position.

8. Plaintiff was never given any reason why he was not selected to fill the position for which he was clearly qualified and for which he was already receiving the job salary.

9. Plaintiff seeks to amend his Complaint to assert a third count alleging that Defendant County of Union has deliberately and intentionally continued to deprive Plaintiff of his rightful position in retaliation for his having filed a lawsuit asserting his rights under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq.

10. R. 4:9-1 provides that amendments of pleadings shall be freely given in the interest of justice. Therefore, a motion for leave to amend pleadings must be treated with liberality. Malone v. Aramark Services, 334 N.J. Super 669 (Law. Div. 2000). The interests of

justice require that Plaintiff be permitted to file the proposed amended Complaint to assert this new cause of action. The requested cause of action has just accrued and could not have been brought earlier. Further, were the Court to deny Plaintiff's motion, Plaintiff would be at risk of being precluded from later asserting the claim by Entire Controversy Doctrine. Plaintiff respectfully requests this Honorable Court to grant Plaintiff's Motion for Leave to File a Second Amended Complaint in the interests of justice and the efficient adjudication of all causes of action in one proceeding .

11. For the above stated reasons, it is respectfully requested this Honorable Court enter an Order granting Plaintiff leave to file the Proposed Second Amended Complaint, attached hereto.

I hereby 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.

BREUNINGER & FELLMAN


By: SUSAN B. FELLMAN
Attorneys for Plaintiffs

Dated: June 24, 2014

BREUNINGER & FELLMAN
Attorneys at Law
1829 Front Street
Scotch Plains, New Jersey 07076
(908) 490-9900
Attorneys for Plaintiff

RICHMOND LAPOLLA

Plaintiff,

v.

COUNTY of UNION; GEORGE
DEVANNEY, County Manager and
individually;

Defendants.

**SUPERIOR COURT OF NEW JERSEY
CHAN. DIVISION - UNION COUNTY
DOCKET NO.: UNN-L-003547-11**

Civil Action

**PROPOSED
SECOND AMENDED COMPLAINT AND
DEMAND FOR JURY TRIAL**

Plaintiff, Richmond LaPolla, residing in the city of Cranford, County of Union, State of New Jersey, verifies as follows:

PRELIMINARY STATEMENT

Plaintiff brings this Verified Complaint alleging continuing violations by Defendants County of Union and George Devanney. of the New Jersey State Constitution, and The New Jersey Civil Rights Act on the basis of political affiliation, freedom of association, and freedom of beliefs. Plaintiff also alleges intentional infliction of emotional and mental distress by Defendants. Plaintiff seeks injunctive relief, damages – both compensatory and punitive – counsel fees and costs of suit.

PARTIES

PLAINTIFF

1. Plaintiff RICHMOND LAPOLLA ("Plaintiff") has been employed by the County of

Union since 1979 – thirty-two years. He presently holds the civil service title of Director of Repair and Maintenance and is presently assigned to the County Department of Engineering, Public Works and Facilities Management.

DEFENDANTS

2. Defendant, THE COUNTY OF UNION (“County”) is a political subdivision of the State of New Jersey with general offices in the Union County Administration Building, Elizabeth, New Jersey. Union County has been and continues to be the employer of Plaintiff.

3. Defendant, GEORGE DEVANNEY (“Devanney”) was the County Manager of Union County from 2002 until August 1, 2011. As such, he was the supervisor of Plaintiff with the ultimate authority to hire, fire and assign County employees.

STATEMENT OF FACTS

4. Plaintiff began his public service in Union County in September of 1979 with the civil service title of Maintenance Repair Carpenter. Through the years, Plaintiff took additional civil service tests and was certified in the following higher job titles: Senior Carpenter in October, 1983; Assistant Carpenter Foreman in May, 1985; Assistant Director of Repair and Maintenance in July, 1987. Plaintiff was then appointed the Director of the Division of Buildings and Grounds in the Department of Public Works by then County Manager Ann Baron. In December, 1999, Plaintiff was promoted to the civil service position of Director of Repair and Maintenance (**Exhibit A –job description**). In April of 2004, while maintaining this title, Plaintiff was appointed to the County position of Director of Department of Operations and Facilities by Defendant George Devanney. In this position, Plaintiff managed a work force of over 200 county employees and maintained over one million square feet of office space.

5. Plaintiff's promotions through the ranks of Union County positions illustrate his abilities and commitment to public service. During his thirty-two years, Plaintiff received many positive reviews regarding his work performance and ability to effectively function on the County's behalf. He worked under a number of County Managers appointed by both political parties – never with any problems until George Devanney.

6. Plaintiff's brother, Michael LaPolla, was previously very active in Union County politics. Michael LaPolla served for many years as a Union County Freeholder. He was later appointed County Manager of Union County, a position in which he served for five years. Plaintiff, on the other hand, while supportive of his brother, continued to work in County government as a civil service employee with little or no active involvement in politics.

7. Although the government of Union County is primarily controlled by the Union County Democratic Party, there are factions within the Party competing for political power. One faction is led by Charlotte Defilippo who has been a major political power broker in the Union County Democratic Party for years. Michael LaPolla belonged to another faction.

8. Michael LaPolla was an open critic of Charlotte Defilippo. He openly criticized her use of power and authority to manage and manipulate County workers as well as most of the County Manager's duties. Defilippo was openly hostile to Michael LaPolla as he was to her. Defendant, George Devanney was close to Ms. Defilippo and, based on information and belief, readily followed her instructions.

9. Based on information and belief, Ms. Defilippo had wanted George Devanney appointed County Manager instead of Michael LaPolla. After Michael LaPolla retired, Devanney received the appointment. Former State Senator Joseph Suliga, who had been active in County

politics, pushed to have Plaintiff appointed by Devanney to the position of Deputy County Manager. Plaintiff declined the position since he viewed it as too much in the political spotlight. Also, Devanney preferred to appoint another individual. A deal was reached to make Plaintiff Director of the Department of Operations and Facilities. Devanney was allowed to make his selection to the position, and appoint Elizabeth Genievich as Deputy County Manager. Plaintiff believed he got along well with both Devanney and Defilipo.

10. Shortly after Plaintiff became Department Head, Senator Suliga resigned his Senate seat. Without the political influence of Joseph Suliga, Devanney began to engage in a course of constant and continuing harassment against Plaintiff. His harassment increased in severity after Senator Suliga died in a tragic auto accident. Devanney's harassment created an intolerable work environment for Plaintiff by actions including, but not limited to the following:

- a) unjustifiably accusing Plaintiff of performance deficiencies in an attempt to build a case for Plaintiff's termination;
- b) Moving Plaintiff's key staff people into other departments, replacing four of the five with inexperienced, untrained people unfamiliar with the department – in an effort to insure Plaintiff's inability to be successful in running the Department;
- c) unprovoked public screaming at Plaintiff in tirades of criticism causing Plaintiff tremendous embarrassment;
- d) threatening Plaintiff with suspension in the presence of coworkers and subordinates;
- e) removing Plaintiff's authority to sign documents, vouchers, orders, etc. necessary for doing his job;

f) based on information and belief, Devanney also intimidated other employees into refusing to associate with Plaintiff, isolating him from friends and coworkers.

11. The harassment became so severe that Plaintiff was required to go out on sick leave. While Plaintiff was on sick leave, Devanney appointed another person to oversee the Department. Devanney also took this occasion to inform Plaintiff of Plaintiff's reassignment to Facilities Manager at the construction of a Vocational-Technical School in Scotch Plains totally isolated from the other members of the Operations and Facilities Department. This occurred when Plaintiff returned from sick leave.

12. Plaintiff, with no other option, undertook this new assignment. The new job turned out to be a non-job. Plaintiff was permitted to attend meetings with construction personnel and architects, but was never given any direction from Union County as to his role or duties. Plaintiff had no authority to instruct or order any of the construction personnel or architects because they were autonomous agents not under County control. Plaintiff had no support staff. He served no purpose, and had no responsibilities. This isolation caused Plaintiff severe anxiety and depression. Plaintiff, clearly an outsider, served no County function nor purpose for over five year.

13 After approximately five years in this none-position, the Vocational-Technical School project was completed. Devanney found another place for Plaintiff even more isolated – again with absolutely no duties nor responsibilities. Plaintiff was reassigned in the fall of 2010 to the Union County Juvenile Detention Center in Linden.

14. Plaintiff reports to a windowless cinder-block storage closet. He must ask permission everyday from the facility security personnel to enter or leave the facility by a door in the back of the Center. Plaintiff sits in this isolated closet day after day without contact with

anyone. He has no responsibilities, no supervision, and no purpose.

15 As a result of this solitary confinement, Plaintiff suffers from severe anxiety and depression. Fearful of losing his job, Plaintiff has made no complaints to Devanney. He requires ongoing medical treatment but refuses to resign his employment of thirty-two years.

16. Plaintiff has been under the care of psychiatrist Harvey M. Hammer, M.D. since November, 2010. Dr. Hammer has diagnosed Plaintiff with Major Depressive Disorder. Dr. Hammer has found, "The Disorder is directly related to the punitive measures imposed on Mr. LaPolla by Union County as related to his employment and his employment environment". Dr. Hammer found that the future of Plaintiff's condition is "dependent in part in some relief from his oppressive work environment." (See **Exhibit B -- copy of Dr. Hammer's Report dated June 22, 2011**)

CAUSES OF ACTION

COUNT ONE

(Violation of New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq.)

17. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 16 as if set forth at length herein.

18. By and through the actions set forth in the above Statement of Facts, Defendants violated N.J.S.A. 10:6-2 by acting under color of state law to retaliate against Plaintiff by reason of Plaintiff's political affiliation. Plaintiff is protected from such retaliation by Article 1, Section 6 and Section 18 of the New Jersey Constitution.

19. At all times relevant to this action, Defendant Devanney, had final decision-making authority relevant to Defendants' retaliatory actions against Plaintiff, and by his actions has set the

policy for Union County.

20. As a result of Defendants' political retaliation, Plaintiff has suffered career disruption, humiliation, loss of status, anxiety, depression, and general mental and emotional distress.

WHEREFORE, Plaintiff RICHMOND LAPOLLA demands judgment:

- A. Reinstating Plaintiff to a position commensurate with his civil service title, with all offices, staff, and duties of his civil service position and in a physical location where he worked before the harassment began. (See **Exhibit A**)
- B. Ceasing of all harassment against Plaintiff and interference with Plaintiff's work;
- C. An award of damages, both compensatory and punitive, against the Defendants, jointly and singly;
- D. An award of counsel fees and costs of suit.

COUNT TWO

(Intentional Infliction of Emotional Distress)

21. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 20 as if set forth at length herein.

22. Defendants could not fire Plaintiff without cause due to his being a civil service employee. Defendants decided to cause Plaintiff extreme emotional distress for the purpose of compelling his resignation or making him so ill he would have to resign. This treatment constitutes extreme and outrageous conduct on the part of the Defendants.

23. As a result of Defendants' extreme and outrageous intentional conduct, Plaintiff has suffered career disruption, humiliation, loss of status, anxiety, depression, and severe mental and emotional distress and injury.

WHEREFORE, Plaintiff RICHMOND LAPOLLA demands judgment against the

Defendants County of Union and George Devanney, jointly and singly,

- A. Reinstating Plaintiff to a position commensurate with his civil service title, with all offices, staff, and duties of his civil service position and in a location where he worked before the harassment began. (See **Exhibit A**)
- B. Ceasing of all harassment against Plaintiff and interference with Plaintiff's work;
- C. An award of damages, both compensatory and punitive, against the Defendants, jointly and singly;
- D. An award of counsel fees and costs of suit.

COUNT THREE

(Retaliation for Filing Lawsuit)

24. Plaintiff repeats and re-alleges each and every allegation contained in Paragraphs 1 through 23 as if set forth at length herein.

25. Plaintiff continued his employment in another "non-job" assignment at the Watchung Stables where he has been assigned since November, 2011. In actuality, he has no duties, was given no instructions, has no people to supervise and there are no employees from his Department with whom to interact. He remains sitting in his office devoid of any meaningful work to do; instead, needlessly passes paperwork.

26. In September, 2013, Plaintiff became aware that the position of Division Head in the Department of Facilities Management, a position that he held for many years, had become vacant. Plaintiff made a request that he be given this position, restoring him to his rightful civil service job.

27. In February, 2014, Plaintiff learned that the position was being posted. (See **Exhibit C**, posting for vacancy for County Division Head, Division of Facilities Management). The

posting describes the duties of Plaintiff's civil service title and the duties he had performed for years. Plaintiff applied for the job, forwarded his resume and eventually appeared for an interview.

28. Plaintiff has repeatedly advised the decision makers that he is the only person that can step into the position without need for any training due the numerous years he successfully performed the same duties; and that as he is receiving a salary of \$128,000 a year for his "Non job", putting Plaintiff in the vacancy would save the County considerable money by eliminating the salary and benefits of the person who previously held the job.

29. On June 10, 2014, Plaintiff learned that another County employee had been given the job and was starting in the position that day. Plaintiff has subsequently learned through his OPRA request that the successful candidate has the Civil Service Title of carpenter and is receiving a salary of \$88,000 per year. (See **Exhibit D**, Proposed Personnel Action Form). Based on information and belief, this individual has no administration nor supervisory experience, and as such, does not meet the minimum requirements set forth in the posted position.

30. No reason has been given to Plaintiff as to why he did not receive the job for which he was clearly qualified and for which he was already receiving the job salary. In the least, Plaintiff is more qualified for the position than the individual who was given the job, and that had it been given to him; would have saved the County considerable money.

31. Plaintiff continues to sit in an office all day staring into space with no meaningful work to do. Defendant has deliberately and intentionally continued to deprive Plaintiff of his rightful position in retaliation for his having filed a lawsuit asserting his rights under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq.

32. As a result of Defendant's continued intentional retaliation, Plaintiff continues to

suffer has suffered career disruption, humiliation, loss of status, anxiety, depression, and severe mental and emotional distress and injury.

WHEREFORE, Plaintiff RICHMOND LAPOLLA demands judgment against the Defendant County of Union,

- A. Reinstating Plaintiff to a position commensurate with his civil service title, with all offices, staff, and duties of his civil service position and in a location where he worked before the harassment began. (See **Exhibit A**)
- B. Ceasing of all harassment against Plaintiff and interference with Plaintiff's work;
- C. An award of damages, both compensatory and punitive, against the Defendant;
- D. An award of counsel fees and costs of suit.

BREUNINGER AND FELLMAN

By: _____
PATRICIA BREUNINGER
Attorneys for Plaintiff

Dated: June 24, 2014

DEMAND FOR JURY TRIAL

Plaintiff herein demands trial by jury as to all issues in this action.

BREUNINGER AND FELLMAN

By: _____
PATRICIA BREUNINGER
Attorneys for Plaintiff

Dated: June 24, 2014

CERTIFICATION AND DESIGNATION OF TRIAL COUNSEL

1. Pursuant to R. 4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending or arbitration proceeding, to the best of my knowledge and belief. Also, to the best of my belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading and previous pleadings, at the present time, we know of no other parties that should be joined in the within action.

2. PATRICIA BREUNINGER and SUSAN B. FELLMAN are designated as trial attorneys of the within matter.

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

BREUNINGER AND FELLMAN

By: _____
PATRICIA BREUNINGER
Attorneys for Plaintiff

Dated: June 24, 2014

EXHIBIT A

DIRECTOR, REPAIR AND MAINTENANCE

DEFINITION

Under direction, is responsible for the planning, supervision, and administration of the construction, alteration, maintenance and repair programs for publicly owned buildings and structures; does related work as required.

EXAMPLES OF WORK

- Organizes, develops and has charge of maintenance and repair programs.
- Responsible for preparation of specifications for competitive bids for repair work.
- Responsible for the evaluation of competitive bids and makes suitable recommendations based on these evaluations.
- Responsible for training assigned employees by giving them suitable assignments and instructions.
- Evaluates and is responsible for the completion of assignments for conformance with efficient and economical trade and jurisdictional practices.
- Provides technical assistance in estimating costs for various maintenance programs.
- Directs and supervises the operation, maintenance and repair, as well as the servicing of buildings and parts thereof, mechanical equipment, gas, electrical, plumbing and/or sewage lines, pipes and fixtures, carpentry, steamfitting, masonry and other equipment or accessories.
- Directs a program of repair, remodeling or renovation of physical structures.
- Implements and maintains a program for the effective utilization of personnel and supplies and equipment.
- Controls adherence to contractual obligations.
- Responsible for preparation of the annual budget covering activities of the repair and maintenance division.
- Conducts periodic investigations at various repair locations to determine effectiveness of maintenance and repair programs.
- Prepares and maintains concomitant reporting systems.
- Develops policies and procedures for the division.
- Establishes and maintains pertinent records and files.

REQUIREMENTS

Experience

Five years of administrative experience in work involving maintenance, construction and repairs of large buildings and structures.

DIRECTOR, REPAIR AND MAINTENANCE - (C. 11111)

Knowledge

- Thorough knowledge of the problems and work involved in maintenance, repair and construction work.
- Of the standard tools, materials, methods, practices, occupational hazards and safety precautions.
- Of the preparation of specifications for materials and equipment.
- Of the proper scheduling of work in a large facility.

Ability

- Ability to read, write, speak and understand English sufficiently to perform the duties of this position.
- Ability to plan, develop, organize, install, analyze, and administrate building maintenance and repair functions.
- To give suitable assignments and instructions.
- To direct the establishment and maintenance of suitable records and files.
- Good health and freedom from disabling physical and mental defects which would impair the proper performance of the required duties or which might endanger the health and safety of oneself or others.

ES
7-14-76

EXHIBIT B

HARVEY M. HAMMER, M.D., P.A.
71 MAPLE AVENUE
MORRISTOWN, NEW JERSEY 07960
(973) 267-1313

DIPLOMATE, AMERICAN BOARD
OF PSYCHIATRY AND NEUROLOGY

LIFE FELLOW, AMERICAN
PSYCHIATRIC ASSOCIATION

June 22, 2011

Psychiatric Report

To Whom it May Concern:

Mr. Richmond Lapolla, age 52 (6/7/58), was first seen by me on November 9, 2010. He appeared depressed and anxious. Mr. Lapolla began working for Union County in 1979. He began as a carpenter. In 1987, he became Assistant Director of Buildings & Grounds for Union County. In 1991, he became Director of Buildings & Grounds. He served as Director until 2002/2003. Mr. Lapolla then became Director of Operations & Facilities on June 22, 2002. He was one of nine or ten Department Heads. A change of Administration occurred in 2002/2003 and the County Manager who had promoted Mr. Lapolla sent Mr. Lapolla to an unacceptable location as described below.

Mr. Lapolla was sent to a vocational school in Scotch Plains, NJ. Mr. Lapolla completed his work as it was assigned. After approximately five years, Mr. Lapolla was "shipped" to Union County Juvenile Detention Center. (August of 2010). Mr. Lapolla was assigned to an office in a storage room. His office remains a storage room. There are no windows in this cinder block office/storage room. Mr. Lapolla has no contact with anyone. He was not assigned any specific task. Entry & Exit to his office requires the opening of a steel jail door by prison officials. Mr. Lapolla spends his entire working day in this office/storage room. Mr. Lapolla has a computer in his office, but has never received any work whatsoever. His working hours are 9AM to 5PM, five days a week. These working conditions are not conducive to a reasonable work environment.

Mr. Lapolla has been waiting for an assignment since last August. Mr. Lapolla is fearful of complaining because he is afraid he will be fired. He is extremely depressed and anxious concerning his "confinement".

Mr. Lapolla has always received positive performance reviews over his 32 years of service with Union County.

Mr. Lapolla related that he had been investigated some 18 months ago, but "nothing came of it". Mr. Lapolla related events that had suggested harassment.

The only counseling Mr. Lapolla has had in the past involved assistance when he had a bone marrow transplant for the Leukemia (CML). Mr. Lapolla had full body radiation and chemotherapy at the time of his diagnosis. Mr. Lapolla is still followed by his oncologist on a once a year basis.

Mr. Lapolla experienced a "Panic Attack" shortly before he came to see me in November of 2010. He presented with signs and symptoms of a progressive anxiety/depressive disorder. He felt both humiliated and isolated. Mr. Lapolla described himself as being a "prisoner" in his job. He stated: "like someone in solitary confinement". The severity of Mr. Lapolla's symptoms were very suggestive of PTSD, including hyper vigilance, preoccupations, intrusive thinking and severely impaired self imagery.

Mr. Lapolla was placed on Clonopin, Zoloft and Abilify. Mr. Lapolla is still taking Zoloft, 150 mgs every day. He takes Clonopin 0.5 mgs once or twice a day.

He continues to have severe sleep difficulties. He is a "stress eater" and has gained weight. His mood is depressed. He is very agitated and preoccupied. He denies any suicidality. He has periods of overwhelming anxiety. He is fully oriented. His concentration is somewhat impaired. He expresses feelings of hopelessness, helplessness and despair. He is both negativistic and nihilistic. Mr. Lapolla has a very grim outlook for his future.

Mr. Lapolla has seen me on 11/9/10, 11/16/10, 11/22/10, 11/30/10, 1/18/11, 2/16/11, 5/12/11 and 5/26/11.

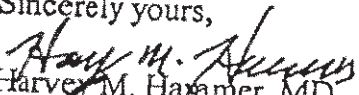
Mr. Lapolla requires ongoing psychiatric treatment, the frequency to be determined by the progression of his illness.

He carries a diagnosis of: Major Depressive Disorder, Single Episode, severe: DSMIV-296.23.

This Disorder is directly related to the punitive measures imposed on Mr. Lapolla by Union County as related to his employment and his employment environment.

Mr. Lapolla's prognosis is guarded and is dependent in part in some relief from his oppressive work environment.

Sincerely yours,


Harvey M. Hammer, MD

HMH/hk

EXHIBIT C

NOTICE OF JOB VACANCY

DEPARTMENT: Public Works & Facilities Management

POSITION: County Division Head, Division of Facilities Management

BRIEF DESCRIPTION OF POSITION: Under general supervision of the Public Works and Facilities Director, coordinates day-to-day operations, maintenance, repair, alteration, and renovation of all Union County owned facilities. Plans, oversees, controls, directs and staffs building maintenance, grounds maintenance, and custodial operations. Provides technical expertise and assistance with the design and construction of complex building projects and ensures project compliance with established plans, specifications, adopted standards, and best industry practices.

REQUIREMENTS: A minimum of seven (7) years experience in administration of building construction/maintenance functions and operations of facilities systems including three (3) years of related supervisory experience.

Applicants will be required to possess and maintain a valid N.J. Driver's License.

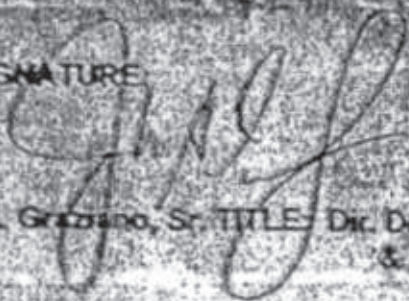
Familiar with FEMA standards preferred but not required.

Licensed Mechanical Engineer preferred but not required.

SALARY RANGE: \$73,945.00 - \$110,915.00

ISSUE DATE: Feb 20, 2014 **CLOSING DATE:** Feb 27, 2014

AUTHORIZED SIGNATURE:



NAME: Joseph A. Graziano, Sr. **TITLE:** Dir. Dept. of Public Works & Facilities Management

INTERESTED APPLICANTS MAY CONTACT UNION COUNTY DEPARTMENT OF ADMINISTRATIVE SERVICES/DIVISION OF PERSONNEL MANAGEMENT

UNION COUNTY IS AN EQUAL OPPORTUNITY EMPLOYER

EXHIBIT D

PROPOSED PERSONNEL ACTION

AGENDA #:

POSITION CONTROL #

00-25841

ACTION TO BE TAKEN

<p>NEW HIRE</p> <p><input type="checkbox"/> Interim <input type="checkbox"/> Temporary</p> <p><input type="checkbox"/> Permanent <input checked="" type="checkbox"/> Unclass</p> <p><input type="checkbox"/> Provisional <input type="checkbox"/> WIA</p>	<p><input type="checkbox"/> PROMOTION IN POSITION <input type="checkbox"/> INTERIM APPOINTMENT</p> <p><input type="checkbox"/> PROMOTION TO VACANCY <input type="checkbox"/> FUNDING ALLOCATION CHANGE</p> <p><input type="checkbox"/> TRANSFER <input checked="" type="checkbox"/> SALARY CHANGE</p> <p><input checked="" type="checkbox"/> REPLACE VACANCY <input checked="" type="checkbox"/> TITLE CHANGE</p> <p><input type="checkbox"/> TEMPORARY APPOINTMENT <input checked="" type="checkbox"/> OTHER <u>Grade</u></p>
---	---

Certification #: _____

CURRENT POSITION INFORMATION

DEPT/DIV 775-670 PWF Facilities Management

PREVIOUS EMPLOYEE VACANT (Palmieri Niel)

TITLE Bldg Supt / Co Div Head

SALARY \$111,804.82

FUND ALLOCATIONS 100% County

UNION/EXCLUSIONARY A50 Non-Contractuals

GRADE G21 HOURS 80.00 Date Avail.: 9/30/2013

PROPOSED POSITION INFORMATION

DEPT/DIV 775-670 PWF Facilities Management

PROPOSED EMPLOYEE Charles Chirafesi

TITLE County Division Head

SALARY \$88,000.00

FUND ALLOCATIONS 100% County

UNION/EXCLUSIONARY A50 Non-Contractuals

GRADE G20 HOURS 80.00 HIRE D _____

EMPLOYEE INFORMATION

NAME Charles Chirafesi

STARTING/PROPOSED SALARY \$88,000.00

GRADE G20 MIN: \$73,945 MAX: \$110,915

EFFECTIVE DATE _____

PROMOTION IN POSITION PROMOTION TO VACANCY

DATE OF LAST PROMOTION _____

EMPLOYEE'S CURRENT SALARY \$69,112.10

CURRENT GRADE G18 PC# _____

\$ Increase 18,887.90

Current Title Carpenter

Current Union _____

AUTHORITY FOR REQUESTED ACTION

	DATE		DATE
DEPARTMENT HEAD	<u>2/10/14</u>	ADMIN. SERVICES	<u>2/10/14</u>
PERSONNEL	<u>2/10/14</u>	COUNTY MANAGER	<u>2/10/14</u>
FINANCE	<u>2/10/14</u>		

COUNTY MANAGER DATE 2/10/14

RESOLUTION BOARD ACTION (if required)

RESOLUTION NO. _____ DATE ADOPTED _____

ADDITIONAL INFORMATION (including Position Funding with account numbers: x-xxxx-xxxx-xxx-form#)

6

EEO 4 FUNCTION CODE _____

BREUNINGER & FELLMAN
Attorneys at Law
1829 Front Street
Scotch Plains, New Jersey 07076
(908) 490-9900
Attorneys for Plaintiff

RICHMOND LAPOLLA Plaintiff, v. COUNTY of UNION; GEORGE DEVANNEY, County Manager and individually; Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - UNION COUNTY
DOCKET NO.: UNN-L-003547-11**

Civil Action

**ORDER GRANTING LEAVE
TO FILE A SECOND
AMENDED COMPLAINT**

This matter having been opened to the Court by Breuninger & Fellman, attorneys for Plaintiff Richmond Lapolla, for an Order granting leave to file a Second Amended Complaint pursuant to New Jersey Rules of Court 1:6-2 and 4:9-1, and the Court having considered the moving papers, and for other good cause shown:

ORDERED that Plaintiff is hereby granted leave to file the Proposed Second Amended Complaint alleging a Third Count against the Defendant County of Union;

IT IS FURTHER ORDERED that said Second Amended Complaint shall be filed within seven (7) days of the date of this Order; and

IT is FURTHER ORDERED that a copy of this Order be served upon all parties within _____ days.

J.S.C.

OPPOSED _____

UNOPPOSED _____

BREUNINGER & FELLMAN
Attorneys at Law
1829 Front Street
Scotch Plains, New Jersey 07076
(908) 490-9900
Attorneys for Plaintiff

RICHMOND LAPOLLA

Plaintiff,

v.

COUNTY of UNION; GEORGE
DEVANNEY, County Manager and
individually;

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - UNION COUNTY
DOCKET NO.: UNN-L-003547-11**

Civil Action

**ORDER EXTENDING DISCOVERY FOR
AN ADDITIONAL SIXTY (60) DAYS**

THIS MATTER having been brought before the Court on Motion by Breuninger & Fellman, attorneys for Plaintiff, pursuant to R.4:24-2 for an Order extending discovery for an additional sixty (60) days, and for good cause appearing;

ORDERED that the discovery end-date in this matter is extended for an additional thirty (60) days, until September 13, 2014;

ORDERED that a copy of the within Order shall be served upon all parties within days of the date herein contained.

J.S.C.

BREUNINGER & FELLMAN
ATTORNEYS AT LAW
1829 FRONT STREET
SCOTCH PLAINS, NEW JERSEY 07076

826 WASHINGTON STREET • SUITE B
HOBOKEN, NEW JERSEY 07030

(908) 490-9900

SUSAN B. FELLMAN (NJ & MICH)
E-mail: sfellman@comcast.net

Facsimile: (908) 490-9950

June 24, 2014

Via Overnight Courier
Superior Court of New Jersey
Union County Courthouse
2 Broad Street
Elizabeth, New Jersey 07207

Attn: Clerk - Law Division

RE: Richmond Lapolla vs. County of Union, et als
Docket No. UNN-L-003547-11

Dear Sir/Madam:

This office represents the Plaintiff in the above referenced matter.

Enclosed for filing please find an original and one copy of the following:

1. Notice of Motion To Extend Discovery;
2. Certification of Susan B. Fellman, Esq. with Exhibits; and
3. Proposed Order.

Also enclosed is a check in the amount of \$30.00, the cost to file this Motion and a self-addressed envelope for the return of the executed Order.

Thank you for your attention to this matter.

Very truly yours,


SUSAN B. FELLMAN

SBF/ml
Enc.

Via Overnight Courier (w/enc.)

cc: Robert Varady, Esq.
Robert Renaud, Esq.

BREUNINGER & FELLMAN
Attorneys at Law
1829 Front Street
Scotch Plains, New Jersey 07076
(908) 490-9900
Attorneys for Plaintiff

RICHMOND LAPOLLA

Plaintiff,

v.

COUNTY of UNION; GEORGE
DEVANNEY, County Manager and
individually;

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - UNION COUNTY
DOCKET NO.: UNN-L-003547-11**

Civil Action

**NOTICE TO MOTION TO EXTEND
DISCOVERY PURSUANT
TO R. 4:24**

TO: Robert F. Varady, Esq.
La Corte, Bundy, Varady & Kinsella
989 Bonnel Court
Union, NJ 07083
Counsel for Defendant County of Union

Robert F. Renaud, Esq.
Palumbo & Renaud
190 North Avenue East
Cranford, NJ 07016
Counsel for Defendant George Devanney

PLEASE TAKE NOTICE that on **Friday, July 11, 2014** at 9:00 a.m. o'clock in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff, Richmond Lapolla shall apply to the above named Court at the Union County Court House in Elizabeth New Jersey, for an Order pursuant to R. 4:24 extending discovery for an additional sixty (60) days until September 13, 2014. In support of this Motion, Plaintiff will rely upon the Certification of Susan B. Fellman, Esq. attached hereto.

A proposed form of Order is submitted.

I hereby certify that the original of this Notice of Motion has been filed the Clerk of Union County and a copy has been served on all defense counsel via facsimile and regular mail.

Pursuant to R. 1:6-2(d), the undersigned requests oral argument if opposition is filed.

BREUNINGER & FELLMAN
Attorneys for Plaintiff

By:


SUSAN B. FELLMAN

Dated: June 24, 2014

Discovery End date: July 15, 2014

Trial date: October 6, 2014

BREUNINGER & FELLMAN
Attorneys at Law
1829 Front Street
Scotch Plains, New Jersey 07076
(908) 490-9900
Attorneys for Plaintiff

<p>RICHMOND LAPOLLA</p> <p>Plaintiff,</p> <p>v.</p> <p>COUNTY of UNION; GEORGE DEVANNEY, County Manager and individually;</p> <p>Defendants.</p>
--

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - UNION COUNTY
DOCKET NO.: UNN-L-003547-11**

Civil Action
**CERTIFICATION OF COUNSEL IN
SUPPORT OF MOTION TO EXTEND
DISCOVERY**

I, SUSAN B. FELLMAN, hereby certify as follows:

1. I am an Attorney at Law of the State of New Jersey and am a partner with the law firm of Breuninger & Fellman, the attorneys of record for Plaintiff Richmond LaPolla with regard to the within matter.

2. By way of Amended Verified Complaint dated October 4, 2011, Plaintiff brought suit against Defendants County of Union and County Manager George Devanney alleging violations by Defendants County of Union and George Devanney of the New Jersey State Constitution, and The New Jersey Civil Rights Act on the basis of political affiliation, freedom of association, and freedom of beliefs. Plaintiff also alleged intentional infliction of emotional and mental distress by Defendants.

3. Discovery in this matter has been extensive involving production of hundreds of documents and the depositions of many witnesses. ~~Discovery has been accomplished through the~~ case management of the Honorable James Hely, J.S.C.. In accordance with Judge Hely's Case Management Order entered on May 9, 2014, the present discovery end date is July 15, 2014 with trial is set for October 6, 2014. (A copy of this Order is attached as **Exhibit A**). The parties have

cooperated in completing the necessary discovery by the present deadline which based on information and belief would have been completed by the discovery end date. However, a very recent event requires that Plaintiff seek to file a Second Amended Complaint that sets fourth an additional Count for Retaliation for having filed a lawsuit alleging violation of his civil rights that will require additional, although limited discovery. Along with this Motion to Extend the Discovery End-Date, Plaintiff has filed a Motion for Leave to File the Second Amended Complaint with the Proposed Amended Complaint in which he alleges this new cause of action.

4. As set forth in the Certification of Counsel in support of the Motion for Leave to File a Second Amended Complaint, in September, 2013, Plaintiff became aware that the position of Division Head in the Department of Facilities Management became vacant. This was the position Plaintiff had held for years and which was consistent with his Civil Service Title of Director Repair and Maintenance. The position was posted in February, 2014. Plaintiff applied for and was interviewed for the position. Based on information and belief, due to his Civil Service title and experience performing the job for the County for many years, Plaintiff was the most qualified person for the job.

5. On June 10, 2014, Plaintiff learned that another County employee had been selected by the Defendant County of Union to fill the position and that the individual was beginning the job that day.

6. Information Plaintiff just received pursuant to his OPRA request indicates that the successful candidate has a Civil Service Title of carpenter and, based on information and belief, has no administration nor supervisory experience, and as such, does not meet the minimum requirements set forth in the posted position.

~~7. By way of the companion Motion for Leave to File a Second Amended Complaint,~~
Plaintiff seeks to assert a cause of action against the Defendant County of Union that has just accrued for retaliation for his having filed a lawsuit asserting his rights under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq.

8. Plaintiff satisfies the requirements of R. 4:24-1 (c) for an extension of the discovery end-date after a trial date has been fixed, as it was in Judge Hely's Case Management Order. As set forth above, discovery would have concluded on the original causes of action set forth in the First Amended Complaint in accordance with the discovery end-date due to cooperation among the attorneys with the assistance of the Court. Plaintiff could not have asserted the claim for which he now seeks additional time for discovery any sooner as it was only on June 10, 2014 that the announcement was made and that Plaintiff learned that another County employee was given the job. Thereafter Plaintiff exercised due diligence in seeking by way of an OPRA request information regarding the successful candidate. Although much of what Plaintiff has requested has not as yet been provided, Plaintiff did receive and relies upon in his Proposed Second Amended Complaint the information as to the individual's civil service title and salary. Further, Plaintiff has timely moved for an extension of discovery by way of this Motion.

9. It is essential that Plaintiff be permitted to do the additional discovery as to this new cause of action. It is anticipated that the additional discovery will likely consist of depositions of the present County Manager, Department Director and HR representative who were the persons likely involved in the interview process and the decisions made; and document production which would include applications, resumes and other HR documents and notes.

10. Counsel for the County of Union has advised that he will not oppose the Motion to Extend discovery in the event the Court grants the Motion for Leave to File the Second Amended Complaint.

11. For the foregoing reasons, it is respectfully requested that this Honorable Court grant a sixty (60) day extension of the discovery end-date.

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

Dated: June 24, 2014

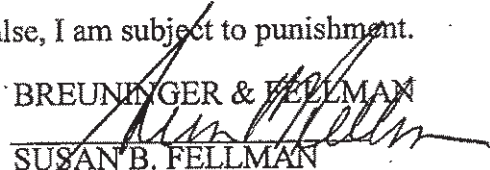
By: 
BREUNINGER & FELLMAN
SUSAN B. FELLMAN
Attorneys for Plaintiff

EXHIBIT A

FILED

MAY 09 2014

JAMES HELY, J.S.C.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, UNION COUNTY
DOCKET NO.: UNN-L- 3547-11

Lapolla

PLAINTIFF,

v.

Union County, et al

DEFENDANT.

CIVIL ACTION

CASE MANAGEMENT ORDER

A Case Management Conference having been held by the Court on 5/9/14;
and the Court having considered the matter, and good cause appearing:

It is hereby ordered and adjudged as follows:

CASE MANAGEMENT ORDER

CHECK IF
APPLICABLE

1. Plaintiff(s) is (are) to provide fully responsive answers to defendant's interrogatories on or before _____;
2. Defendant(s) is (are) to provide fully responsive answers to plaintiff's interrogatories on or before _____;
3. (a) If the form interrogatories found in Appendix II to the Rules of Court do not apply to this case, then interrogatories not exceeding 20 in number without subparts shall be served within 10 days of the date hereof. Otherwise, said form interrogatories are to be utilized. See R. 4:17-1;
- (b) The party served with interrogatories shall serve his/her answers thereto upon the party propounding them within 30 days after service of such interrogatories upon him/her;

- (c) In the event that relief is required from the accelerated discovery provisions of this Order, such relief shall be sought within 30 days from this date on formal motion supported by a detailed certification as to why the discovery cannot be completed within the time allotted. The provisions of R. 4:24-1 do not apply.
4. Plaintiff(s) is (are) to respond to defendant's Notice to Produce on or before _____;
5. Defendant(s) is (are) to respond to plaintiff's Notice to Produce on or before _____;
6. Plaintiff(s) _____ is (are) to be produced for depositions on or before _____. If the depositions are adjourned by defendant without good cause, the right to take same is waived. If adjourned by plaintiff without good cause, plaintiff's testimony is barred at trial. If the depositions are not noticed by the above date, the right to same is waived;
7. Defendant(s) _____ is (are) to be produced for depositions on or before _____. If the depositions are adjourned by plaintiff without good cause, the right to take same is waived. If adjourned by defendant without good cause, defendant's testimony is barred at trial. If the depositions are not noticed by the above date, the right to same is waived;
8. Plaintiff is to serve medical expert's report(s) on or before _____ or be barred from introducing evidence on this issue;
9. Plaintiff is to serve liability expert's report(s) on or before _____ or be barred from introducing evidence on this issue;
10. Plaintiff is to serve economic expert's report(s) on or before _____ or be barred from introducing evidence on this issue;
11. If desired, defendant(s) are to serve medical expert's report(s) on or before _____ or be barred from introducing evidence on this issue;
-
12. If desired, defendant(s) are to serve liability expert's report(s) on or before _____ or be barred from introducing evidence on this issue;
13. If desired, defendant(s) are to serve economic expert's report(s) on or before _____ or be barred from introducing evidence on this issue;

14. If noticed, plaintiff is to produce medical expert(s) for depositions on or before _____. If not noticed, defendant will waive right to same. If adjourned by plaintiff, testimony from such witness will be barred absent exceptional circumstances. If adjourned by defendant, the right to same is waived;
15. If noticed, plaintiff is to produce liability expert(s) for depositions on or before _____. If not noticed, defendant will waive right to same. If adjourned by plaintiff, testimony from such witness will be barred absent exceptional circumstances. If adjourned by defendant, the right to same is waived,
16. If noticed, plaintiff is to produce economic expert(s) for depositions on or before _____. If not noticed, defendant will waive right to same. If adjourned by plaintiff, testimony from such witness will be barred absent exceptional circumstances. If adjourned by defendant, the right to same is waived;
17. If noticed, defendant is to produce medical expert(s) for depositions on or before _____. If not noticed, plaintiff will waive right to same. If adjourned by defendant, said expert testimony is barred;
18. If noticed, defendant is to produce liability expert(s) for depositions on or before _____. If not noticed, plaintiff will waive right to same. If adjourned by defendant, said expert testimony is barred;
19. If noticed, defendant is to produce economic expert(s) for depositions on or before _____. If not noticed, plaintiff will waive right to same. If adjourned by defendant, said expert testimony is barred;
20. Depositions of any currently known fact witnesses are to be noticed to be held on or before _____. If not noticed, same are waived. Once noticed, the depositions are not to be adjourned by any party without leave of court;
21. Defendant is granted leave to schedule an Independent Medical Exam on or before _____. If same is not scheduled, the right to same is waived. ~~If plaintiff fails to attend or complete the~~
Independent Medical Exam as scheduled, testimony concerning plaintiff's injuries will be barred at trial absent exceptional circumstances;
22. Dispositive motions are to be filed and returnable no later than _____
23. A case management/settlement conference is scheduled for _____ a.m. / p.m. on _____. If defendant(s) has/have

no settlement authority, defendant(s) is/are to notify all parties and the court within three (3) days of the above date. Plaintiff shall be present at the settlement conference. Defendant(s) shall have a representative with settlement authority either present or available by telephone;

24. All parties are to confirm the availability of each witness for the assigned trial date forthwith. If any witness is unavailable after an adjournment has been given to assure the presence of any witness, his/her testimony is to be preserved via videotape. In the event that a witness is unavailable and his/her testimony has not been preserved, the party wishing to produce same will be deemed to have waived that witness' testimony at trial;

25. TRIAL DATE: _____;

26. Before opening statements, the attorneys shall submit to the trial judge copies of any materials exchanged pursuant to R.4:25-7 and written stipulations, special voir dire questions, proposed jury instructions with specific reference to the Model Civil Jury Charges, if applicable, a proposed Jury Verdict Sheet and a list of exhibits, all of which are to be pre-marked. Failure to exchange or submit the required information may result in sanctions.

27. OTHER: = Discovery End date is now

July 15, 2014.

- Trial to be set for 10/6/14

James Hely
JAMES HELY, J.S.C.

cc: Civil Assignment
Angie Jordan, Court Clerk

