

Dated: 4-16-14  
Name of the defendant served: Heather Romanow  
Address for service: 4 W. Carthage

DONALD F. PHELAN  
CLERK OF THE SUPERIOR COURT

If you cannot afford to pay an attorney, you can contact a Legal Services Office. An individual not eligible for free legal assistance may obtain a referral to an attorney by calling a county lawyer referral service. This number may be listed in the yellow pages of your phone book or may be obtained by calling the New Jersey State Bar Association Lawyer Referral Service toll free at (800) 367-0089. The phone numbers for the county in which this action is pending are: Union County Bar Association, (908) 354-0089, Union County Legal Services, (908) 354-4340, Elizabeth) or (908) 755-6663 (Plainfield).

You are hereby SUMMONED in a Civil Action in the Superior Court of New Jersey, instituted by the above named plaintiff and required to serve upon the attorney for the plaintiff, who name and answer to the annexed complaint, or (2) a general appearance in accordance with R. 5:4-3(a), within 35 days after the service of the summons and complaint upon you, exclusive of the day of service. If you fail to answer, or fail to file a general appearance in accordance with R. 5:4-3(a), judgment by default may be rendered against you for the relief demanded in the complaint. You shall promptly file your answer or your general appearance and proof of service therewith with the local filing in accordance with the rules of civil practice and procedures.

The state of New Jersey, To The above Named Defendant:

CIVIL ACTION  
SUMMONS

DOCKET NO. FM-20-1146-14

Heather Romanow  
DEFENDANT  
(OTHER PARTY'S NAME)

VS.

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION-FAMILY PART  
UNION COUNTY

(YOUR NAME)  
PLAINTIFF

PRO SE

NAME: Susan Lemmonly  
ADDRESS: 1005 5th Ave St  
Elizabeth NJ 07206  
TELEPHONE: 608-584-5627

UNION COUNTY COUNSEL  
RECEIVED  
MAY - 6 2014  
4/25/14  
ADMINISTRATION BUILDING  
ELIZABETH, NJ

*[Handwritten signature]*

Address of Defendant to Be Served: UC Courthouse  
Name of Defendant to Be Served: Gregory Flemming  
DATED: 4/16/14

Clerk of the Superior Court

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). 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 directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

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.

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the 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. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf)). If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey 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 of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

From The State of New Jersey To The Defendant(s) Named Above:

Defendant(s)

Gregory Flemming

vs.

Plaintiff(s)

LSJ

Attorney(s) for Plaintiff

Attorney(s) Justin Lemire  
Office Address Box 5, Office 5F  
Town, State, Zip Code Lawrenceville, GA 30046  
Telephone Number 678-884-5227

CIVIL ACTION  
SUMMONS

Docket No: 1146-14  
DIVISION \_\_\_\_\_  
COUNTY \_\_\_\_\_

Superior Court of  
New Jersey

SUMMONS

Perry maben  
130 S. Stiles St  
Linden, NJ 07036

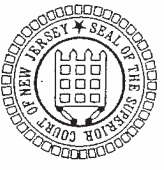
Gregory Fleming  
32 Rahway ave  
Elizabeth, NJ 07202

DV DANIELS NJ 070  
25 APR 2014 PM 11



07202211532



FOR USE BY CLERK'S OFFICE ONLY	
PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> JCG <input type="checkbox"/> CA	CHG/CK NO.
AMOUNT:	OVERPAYMENT:
BATCH NUMBER:	
<b>CIVIL CASE INFORMATION STATEMENT</b> (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	
	
ATTORNEY / PRO SE NAME	JUSTIN B. GONZALEZ
TELEPHONE NUMBER	908-972-3306
COUNTY OF VENUE	Lancaster
FIRM NAME (if applicable)	
OFFICE ADDRESS	130 S. 5th St Lancaster NJ 07366
DOCUMENT TYPE	Complaint
JURY DEMAND	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
NAME OF PARTY (e.g., John Doe, Plaintiff)	Justin B. Gonzalez
CAPTION	Justin Gonzalez vs. John S. Thorski et al
CASE TYPE NUMBER	618,005
(See reverse side for listing)	
HURRICANE SANDY RELATED?	<input type="checkbox"/> YES <input type="checkbox"/> NO
IS THIS A PROFESSIONAL MALPRACTICE CASE?	<input type="checkbox"/> YES <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known)	<input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>	
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION	
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
IF YES, IS THAT RELATIONSHIP:	<input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> BUSINESS <input type="checkbox"/> OTHER (explain)
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY?	<input type="checkbox"/> YES <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	mental
WILL AN INTERPRETER BE NEEDED?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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: Justin B. Gonzalez	





I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made

CERTIFICATION OF NO OTHER ACTIONS

Dated: 4-1-14  
Signature: [Handwritten Signature]

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

- 1. ~~emotional distress, psychological breakdowns, loss of freedom,~~
- 2. ~~violations of both state & federal rights~~
- 3. ~~post traumatic stress~~

(list each item of damage and injury):

3. The harm that occurred as a result of defendant's acts include:

2. Plaintiff is entitled to relief from defendant under the above facts.

(name of county where defendant lives)

In the County of \_\_\_\_\_ State Of New Jersey.

The defendant in this action resides at Lincoln County Courthouse (defendant's address)

a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 4-1-14  
Signature: [Handwritten Signature]

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

**JURY DEMAND**

The plaintiff demands trial by a jury on all of the triable issues of this complaint pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

Dated: 4-1-14  
Signature: \_\_\_\_\_

Address of Defendant to Be Served: 10 Elizabethtown Plaza, Elizabeth, NJ 07207

Name of Defendant to Be Served: County of Union

DATE: 05/13/2014

Clerk of the Superior Court

*Michelle Smith*

[http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf)

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From The State of New Jersey To The Defendant(s) Named Above:

Defendant(s)

Lyons, Tina Mallock, Alberto Rodriguez, Carl Cunningham  
County of Union, Union County Detention Center, Greg

Vs.

Plaintiff(s)

Attorney(s) Brian S. Schiller, Esq.  
Office Address Schiller & Pittenger, P.C.  
Town, State, Zip Code 1771 Front Street  
Scotch Plains, NJ 07076  
Telephone Number (908) 490-0444  
Attorney(s) for Plaintiff Shiquon Fowler

Superior Court of  
New Jersey

UNION COUNTY  
LAW DIVISION  
Docket No: UNN-L-1589-14

CIVIL ACTION  
SUMMONS AND COUNSEL  
RECEIVED  
MAY 16 2014  
ADMINISTRATION BUILDING  
ELIZABETH, NJ

SUMMONS



UNION COUNTY SUPERIOR COURT  
2, BRAD STREET  
ELIZABETH NJ 07202

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (908) 659-4817  
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 06, 2014

RE: POWERS VS UNION COUNTY ET AL.

DOCKET: UIN L - 001589 14

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 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 ALAN G. LESNRWICH

IF YOU HAVE ANY QUESTIONS, CONTACT TRAM 001

AT: (908) 659-4820.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A

PETITION 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: BRIAN S. SCHILLER

SCHILLER & PITTMAN

1771 FRONT STREET

SUITE D

SCOTCH PLAINS NJ 07076

ALAN

said County.

4:2-3 of the Rules Governing the Courts of the State of New Jersey inasmuch as the claims arose in  
Governing the Courts of the State of New Jersey. Venue is proper in Union County pursuant to Rule  
1. This is an action in a case of actual controversy and is brought pursuant to the Rules

**Jurisdiction and Venue**

following:

Plaintiff, Shiquon Fowler, by way of Complaint against the Defendants, says the

Defendants.

identified,  
20, fictitious names for persons/entities yet to be  
DOUGLAS POKE and JOHN DOES 1 through  
OWEN WILLIAMS, SHERITA LAWSON,  
REBECCA MENTOR, SHAVONA HOLIDAY,  
HINIOSA, SHERIE BROWN-BRASWELL,  
ALLEN, THELMA ABNEY, ANTONIO  
CUNNINGHAM, EDWARD KOON, TEKKI  
MATLOCK, ALBERTO RODRIGUEZ, CARL  
DETENTION CENTER, GREG LYONS, TINA  
COUNTY OF UNION, UNION COUNTY

v.

Plaintiff,

SHIQUN FOWLER,

Attorneys for Plaintiff, Shiquon Fowler  
Brian S. Schiller - 024722009  
SCHILLER & PITTINGER, P.C.  
1771 Front Street  
Scotch Plains, New Jersey J 07076  
(908) 490-0444

UNN-L-1589-14

COMPLAINT  
AND  
JURY DEMAND

Civil Action

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY  
DOCKET NO: UNN-L- 13

RECEIVED FILED  
Superior Court of New Jersey  
MAY 05 2014  
CIVIL CASE MANAGEMENT  
UNION COUNTY

The Parties

2. At all times relevant hereto, Plaintiff, Shiquon Fowler ("Plaintiff"), was a citizen of the State of New Jersey, residing 1165 U.S. Route 22 in the Township of North Plainfield, County of Somerset and State of New Jersey, and was entitled to all the rights and privileges secured by the Constitution of the United States and State of New Jersey.

3. At all times relevant hereto, Defendant, County of Union ("County"), was a governmental entity and corporation of the State of New Jersey.

4. At all times relevant hereto, Defendant, Union County Juvenile Detention Center ("Detention Center"), located in the City of Linden, Union County, New Jersey was a secure facility which housed juveniles primarily for serious offenses.

5. At all times relevant hereto, the County owned, was responsible for and operated the Detention Center through and by County employees.

6. At all times relevant hereto, Defendant, Greg Lyons ("Lyons") was employed by the County as the Superintendent of the Detention Center and acted within the scope of his employment by the County.

7. At all times relevant hereto, Defendant, Tina Matlock ("Matlock") was employed by the County as the Assistant Superintendent of the Detention Center and acted within the scope of her employment by the County.

8. At all times relevant hereto, Defendant, Antonio Rodriguez ("Rodriguez") was employed by the County as the Chief of the Detention Center and acted within the scope of his employment by the County.

9. At all times relevant hereto, Defendant, Carl Cunningham ("Cunningham") was employed by the County as a Senior Officer of the Detention Center and acted within the scope of his employment by the County.

10. At all times relevant hereto, Defendant, Edward Koon ("Koon") was employed

- by the County as a Senior Officer of the Detention Center and acted within the scope of his employment by the County.
11. At all times relevant hereto, Defendant, Tekki Allen ("Allen") was employed by the County as a Senior Officer at the Detention Center and acted within the scope of her employment by the County.
12. At all times relevant hereto, Defendant, Thelma Abney ("Abney") was employed by the County as a Supervising Officer at the Detention Center and acted within the scope of her employment by the County.
13. At all times relevant hereto, Defendant, Antonio Hinojosa ("Hinojosa") was employed by the County as a Senior Officer at the Detention Center and acted within the scope of his employment by the County.
14. At all times relevant hereto, Defendant, Sherrie Brown-Braswell ("Braswell") was employed by the County as an Officer in the Detention Center and acted within the scope of her employment by the County.
15. At all times relevant hereto, Defendant, Rebecca Mentor ("Mentor") was employed by the County as an Officer in the Detention Center and acted within the scope of her employment by the County.
16. At all times relevant hereto, Defendant, Shavona Holiday ("Holiday"), was employed by the County as an Officer in the Detention Center and acted within the scope of her employment by the County.
17. At all times relevant hereto, Defendant, Owen Williams ("Williams"), was employed by the County as an Officer in the Detention Center and acted within the scope of his employment by the County.

- 26. At all times relevant hereto, each of the Defendants had access to Plaintiff's room whether or not his door was locked.
- 25. At all times relevant hereto, Plaintiff was under the care and supervision of the Defendants, all of whom owed him a duty to be safe from injury and wrongful acts by either other inmates or the officers themselves.
- 24. At all times, Defendant Braswell was assigned direct responsibility for those inmates in Unit E. At all times, other officers, inclusive of the Defendants, were also present on the floor to monitor activity in the Units.
- 23. At all times relevant hereto, Plaintiff was an inmate at the Detention Center housed in Unit E. The Units were compromised of separate rooms, each of which was occupied by one inmate.
- 22. Plaintiff was a minor until his eighteenth birthday on October 1, 2012.
- 21. On or about March 24, 2012, Plaintiff was admitted to the Detention Center as an inmate.

**Facts Common to All Counts**

- 19. At all times relevant hereto, Defendant, Douglas Poke ("Poke") was employed by the County as an Officer in the Detention Center and acted within the scope of his employment with the County. At all times relevant hereto, Defendants, John Does 1 through 20, are fictitious names for County employees, or other individuals, and entities, governmental or otherwise, whose actions and/or inactions contributed to Plaintiff's damages as alleged herein.
- 18. At all times relevant hereto, Defendant, Sherita Lawson ("Lawson") was employed by the County as an Officer in the Detention Center and acted within the scope of her employment with the County.

27. In or about April 2012, Braswell began to sexually assault, and demand sexual acts from Plaintiff which were non-consensual and against Plaintiff's will. Braswell threatened Plaintiff with physical abuse should he resist her sexual assaults or report this activity to another employee.
28. Braswell continued the sexually assaults and threats until approximately November 2012.
29. During the time of Braswell's unlawful behavior as stated, the Defendants Mentor, Holiday, Williams, Lawson, and Poke, and perhaps others, became aware of Braswell's continuing sexual abuse and assault of Plaintiff, yet did nothing to stop it nor did they report the behavior to their supervisors.
30. In or about October 2012, and perhaps sooner, Senior Officers Allen, Abney, and Hinojosa became aware of Braswell's conduct. Despite this knowledge, Allen, Abney and Hinojosa failed to inform their supervisors until in or about November 2012. During this entire time, Braswell was permitted to remain an officer and have contact with Plaintiff at will.
31. In or about November 2012, Braswell was instructed to have no further contact with Plaintiff. Nevertheless, she continued to threaten and harass Plaintiff through January 2013 when she resigned.
32. Lyons, Matlock, Rodriguez, Koon and Cunningham became aware of Braswell's conduct, at the latest, in or about November 2012 yet failed to terminate her employment.
33. The actions and inactions alleged herein were committed by the individual Defendants as officials, agents and/or employees of the County pursuant to governmental policy, practice and/or custom and under color of law.
34. As a result of the Defendants' unlawful actions as alleged herein, Plaintiff was caused to suffer serious and permanent physical and emotional injuries which will require extensive medical treatment and expense into the future.



35. Plaintiff's emotional injuries are the proximate result of the intentional and negligent actions of the Defendants.

36. By reason of Defendants' actions, Plaintiff has, and will continue to be, damaged on a permanent basis.

37. Plaintiff repeats the allegations of paragraphs 1 through 36 of the Complaint as if set forth herein at length.

38. At no time did Plaintiff consent, either by words or action, to the conduct of Braswell as aforesaid.

39. By virtue of threats and physical acts, Braswell did inflict unlawful assault and battery upon Plaintiff.

40. Defendants knew, or should have known of this conduct and taken steps to end it sooner.

41. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future. WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.

42. Plaintiff repeats the allegations of paragraphs 1 through 41 of the Complaint as if same were set forth herein at length.

43. At all times relevant hereto, Defendants were acting under color of law.

44. The actions of the Defendants as alleged herein have deprived Plaintiff of rights, privileges and privileges secured to him by the Constitutions of the United States and New Jersey or other laws.

Second Count

First Count

same were set forth herein at length.

52. Plaintiff repeats the allegations of paragraphs 1 through 51 of the Complaint as if

**Fourth Count**

compensatory and punitive, together with interest, costs of suit and attorney's fees.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both serious and permanent injuries, which will require medical treatment and expenses into the future. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of

51. abuse perpetrated by Braswell upon Plaintiff while a minor. carelessly and/or in wanton disregard to Plaintiff's well-being so as to permit the acts of sexual otherwise the custodian of Plaintiff, knowingly permitted or acquiesced or acted negligently and/or

50. The County, by and through the Detention Center, standing in *loco parentis* or

49. Defendants knew, or should have known, of those actions.

adult.

that there was sexual contact and/or sexual penetration between a child under the age of 18 and an

48. The actions of Braswell as aforesaid constitute a violation of N.J.S.A. 2A:61B-1 in

same were set forth herein at length.

47. Plaintiff repeats the allegations of paragraphs 1 through 46 of the Complaint as if

**Third Count**

compensatory and punitive, together with interest, costs of suit and attorney's fees.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both

Civil Rights Act, N.J.S.A. 10:6-1 et seq.

46. Defendants' conduct and actions as alleged herein are in violation of the New Jersey

Defendants acting under color of law.

with, or attempted to be interfered with, by threats, actions, intimidation and coercion by the

45. Plaintiff's exercise and enjoyment of said rights and privileges have been interfered

60. Plaintiff repeats the allegations of paragraphs 1 through 59 of the Complaint as if same were set forth herein at length.

Sixth Count

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both future, compensatory and punitive, together with interest, costs of suit and attorney's fees.

59. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future, and to be regarded as atrocious and utterly intolerable in a civilized society.

58. Braswell's actions in sexually assaulting, abusing and threatening Plaintiff were so outrageous in character and so extreme in degree as to go beyond all possible bounds of decency and to be regarded as atrocious and utterly intolerable in a civilized society.

57. Braswell threatened and coerced Plaintiff to engage in each episode of sexual assault and abuse.

56. Plaintiff repeats the allegations of paragraphs 1 through 55 of the Complaint as if same were set forth herein at length.

Fifth Count

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both future, compensatory and punitive, together with interest, costs of suit and attorney's fees.

55. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future.

54. Defendants breached this duty and were therefore negligent.

from harm.

53. Defendants owed to Plaintiff a duty to house him in a facility reasonably safe

61. The County was negligent by virtue of the doctrines of vicarious liability and respondeat superior.

62. The wrongs of the individual Defendants were committed in the scope of their employment by the County.

63. The County was reckless and/or failed to exercise reasonable care.

64. The County had a non-delegable duty to provide Plaintiff with a reasonably safe environment while housed at the Detention Center.

65. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.

**Seventh Count**

66. Plaintiff repeats the allegations of paragraphs 1 through 65 of the Complaint as if same were set forth herein at length.

67. The County knew or had reason to know of the particular unfitness, incompetence or dangerous attributes of Braswell.

68. The County could reasonably have foreseen that such qualities create a risk of harm to other persons.

69. Plaintiff's injuries were proximately caused by Braswell's incompetence, unfitness or dangerous characteristics.

70. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future.

79. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future.

78. The County's upper management actually participated in the conduct and/or demonstrated willful indifference.

77. The conduct of Braswell was especially egregious.

76. Plaintiff repeats the allegations of paragraphs 1 through 75 of the Complaint as if same were set forth herein at length.

Ninth Count

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.

75. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future.

74. The County knew, or should have known, of its ability to control Braswell and the necessity and opportunity to exercise such control.

73. The acts perpetrated by Braswell were upon the premises of the County.

72. The County failed to exercise reasonable care so as to control the actions of Braswell, in the event she was acting outside the scope of her employment, as to prevent her from intentionally harming the Plaintiff.

71. Plaintiff repeats the allegations of paragraphs 1 through 70 of the Complaint as if same were set forth herein at length.

Eighth Count

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.

84. Plaintiff repeats the allegations of paragraphs 1 through 83 of the Complaint as if same were set forth herein at length.

85. Defendants' actions as alleged herein were in violation of N.J.S.A. 59:1-1 et seq.

86. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.

Eleventh Count

80. Plaintiff repeats the allegations of paragraphs 1 through 79 of the Complaint as if same were set forth herein at length.

81. The Defendants, after becoming aware of Braswell's conduct, negligently retained her as an employee.

82. Braswell continued to threaten and sexually assault Plaintiff after Defendants knew, or should have known, of Braswell's actions.

83. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive of serious and permanent injuries, which will require medical treatment and expenses into the future.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.

Tenth Count

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.



same were set forth herein at length.

94. Plaintiff repeats the allegations of paragraphs 1 through 93 of the Complaint as if

Fourteenth Count

compensatory and punitive, together with interest, costs of suit and attorney's fees.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both

expected to endure.

aforesaid damages as well as emotional distress so severe that no reasonable person could be

93. As a proximate result of the Defendants' actions, Plaintiff has suffered the

follow.

distress, or recklessly in disregard of a high degree of probability that emotional distress would

92. Braswell's actions were intentional in a fashion intended to product emotional

91. The conduct of Braswell was extreme and outrageous towards Plaintiff.

same were set forth herein at length.

90. Plaintiff repeats the allegations of paragraphs 1 through 89 of the Complaint as if

Thirteenth Count

compensatory and punitive, together with interest, costs of suit and attorney's fees.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both

future.

of serious and permanent injuries, which will require medical treatment and expenses into the

89. As a proximate result of the foregoing, Plaintiff has suffered damages, inclusive

88. The actions of Braswell intentionally harmed Plaintiff without justification.

same were set forth herein at length.

87. Plaintiff repeats the allegations of paragraphs 1 through 86 of the Complaint as if

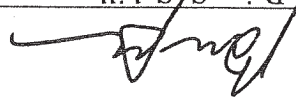
Twelfth Count

95. The negligence of the Defendants caused Plaintiff fright from a reasonable fear of bodily injury.

96. As a proximate result of the Defendants' actions, Plaintiff has suffered the aforesaid damages as well as emotional distress so severe that no reasonable person could be expected to endure.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages, both compensatory and punitive, together with interest, costs of suit and attorney's fees.

SCHILLER & PITTINGER, P.C.  
Attorneys for Plaintiff

BY:   
Brian S. Schiller

Dated:

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues.

DESIGNATION OF TRIAL ATTORNEY

Pursuant to Rule 4:25-4, Brian S. Schiller, Esq. is hereby designated as trial counsel for


Plaintiff.

DEMAND FOR INTERROGATORIES

Pursuant to Rule 4:17-1(b)(2), Plaintiff demands from Defendants answers to Form C

interrogatories.

SCHILLER & PITTINGER, P.C.  
Attorneys for Plaintiff

BY:   
Brian S. Schiller

Dated:

CERTIFICATION PURSUANT TO RULE 4:5-1

The undersigned hereby certifies that this matter is not the subject of any other pending action in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated, and all known necessary parties have been joined in this action.


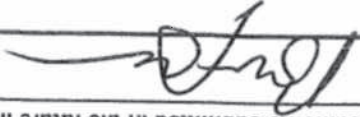
SCHILLER & PITTMER, P.C.  
Attorneys for Plaintiff



BY:

\_\_\_\_\_  
Brian S. Schiller

Date:

<p><b>CIVIL CASE INFORMATION STATEMENT</b> (CIS)</p> <p>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</p>			
<p>FOR USE BY CLERK'S OFFICE ONLY</p> <p>PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA</p> <p>CHG/CK NO. _____</p> <p>AMOUNT: _____</p> <p>OVERPAYMENT: _____</p> <p>BATCH NUMBER: _____</p>		<p>ATTORNEY / PRO SE NAME Brian S. Schiller TELEPHONE NUMBER (908) 490-0444 COUNTY OF VENUE Union</p>	
<p>FIRM NAME (if applicable) Schiller &amp; Pittenger, P.C. DOCKET NUMBER (when available) UNN13 1589-14 COMPLAINT</p>		<p>OFFICE ADDRESS 1771 Front Street Scotch Plains, NJ 07076</p>	
<p>NAME OF PARTY (e.g., John Doe, Plaintiff) Shiquon Fowler CAPTION Shiquon Fowler v. County of Union et. al.</p>		<p>CASE TYPE NUMBER 605 (See reverse side for listing) HURRICANE SANDY RELATED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>	
<p>IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>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.</p>		<p>RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>	
<p>DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		<p>NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN</p>	
<p><b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b></p>			
<p>CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION</p>			
<p>DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>		<p>IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS <input checked="" type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain)</p>	
<p>DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES</p>			
<p>USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION</p>			
<p>DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		<p>IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION</p>	
<p>WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		<p>IF YES, FOR WHAT LANGUAGE?</p>	
<p>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).</p>			
<p>ATTORNEY SIGNATURE: </p>			