

VAN SYOC CHARTERED
TARA PROFESSIONAL PARK
401 SOUTH KINGS HIGHWAY, BUILDING 1
CHERRY HILL, NEW JERSEY 08034
(856) 429-6444
ATTORNEYS FOR PLAINTIFF

FILED

3/20/10

APR 1 2010

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SAMANTHA MULLER,

Plaintiff,

v.

CITY OF SEA ISLE CITY,

Defendant.

SUPERIOR COURT OF NEW JERSEY
- LAW DIVISION - CAPE MAY
COUNTY

DOCKET NO.

CPML-200-10

Civil Action

COMPLAINT, DEMAND FOR JURY
TRIAL, AND DESIGNATION OF
TRIAL COUNSEL

Plaintiff Samantha Muller, who resides in Cape May County, New Jersey, by way of
Complaint against defendants, says:

FIRST COUNT

1. At all relevant times herein, defendant City of Sea Isle City ("Sea Isle") was an organization created and existing pursuant to the laws of the State of New Jersey which was the employer of the plaintiff.

2. On or about August 16, 2001, plaintiff began her employment with Sea Isle as a seasonal employee in Sea Isle's Public Works, Maintenance Department.

3. On or about January, 2002 plaintiff was hired as a full time, permanent employee with the Maintenance Department.

4. Since that time, Plaintiff has been continuously employed by Sea Isle and has fully performed each and every task associated with her position in an exemplary manner.

5. Plaintiff's primary job duties are custodial.
6. The main office of Public Works, where plaintiff clocks in and out daily, is located in the 40th Street Shop.
7. The maintenance employees' locker and rest room facilities are also located in the 40th Street Shop.
8. The male employees are provided with a full locker room and rest room with one shower, two urinals, two stalls, a sink, a utility sink, and full size lockers.
9. The female employees are provided with no private rest room facilities.
10. The many female employees, including plaintiff, are limited to using one single bathroom that is also used by male employees and is used to conduct random drug testing on CDL drivers.
11. Plaintiff's locker is also in this single bathroom and is significantly smaller than the full-size lockers provided to the male employees, being only five foot, by one foot, by one foot in size.
12. Plaintiff has requested that the female employees be provided with a locker room or a restroom designated solely for use by female employees and her requests have not been addressed.
13. Because the only restroom provided to plaintiff was single, plaintiff had to wait until anyone else, male or female, was finished using the facilities even if she merely needed to get into the room to get to her locker.
14. For an approximately two year period prior to Spring 2003, plaintiff was locked out of the rest and locker room facilities entirely if she worked overtime, as the building was locked and plaintiff was not provided with a key until Spring 2003.

15. During this time, plaintiff was often forced to use a public restroom across the street from the 40th Street Shop.

16. Sea Isle Public Works employees are also provided with an employee lounge / break room in the 40th Street Shop.

17. This employee lounge is shared by both male and female employees.

18. From the time she was first hired, plaintiff was routinely exposed to offensive pornographic materials in the common employee lounge.

19. Specifically, plaintiff would routinely find magazines such as Playboy and others like it lying on the table open to graphic photographs of naked women.

20. Plaintiff also routinely found such magazines in the bathroom at the 80th Street Shop.

21. Male employees also used to hang photographs of naked women on the exteriors of their locker doors.

22. A male, seasonal, summer employee once complained about the pornographic photographs that were displayed on the exteriors of male employees' lockers.

23. He was forced to engage in loud verbal arguments with the employees' who were displaying the photographs and did not want to take them down.

24. The seasonal employee's complaints eventually led to the photographs coming down, but the young man was bitterly ostracized by the other employees.

25. The treatment the young man received as a result of having made complaints regarding the other male employees' displaying pornographic materials in the locker room made Plaintiff fearful of making her own complaints because, while the young man left at the

end of the Summer, Plaintiff had to deal with the young man's cruel tormentors year round on a daily basis.

26. Even after the male employees were forced to take the pornographic materials down from the exteriors of their locker doors, the offensive and pornographic magazines remained on display in the common employee lounge until 2005, when a new Director of Public Works started.

27. Such pornographic magazines still appear on occasion at the 80th Street Shop facility of the Public Works Department.

28. As described more fully below, Plaintiff has also been denied promotions and overtime opportunities based on her gender.

29. Specifically, Plaintiff has been told directly by her superiors at Public Works that they would not allow a female to do certain work that was necessary for Plaintiff to receive promotions and the associated pay raises or overtime opportunities and the associated additional compensation.

30. On one occasion, Plaintiff was in the 80th Street Shop speaking to Scavetti in the electrician shop, which had once been a closet, when someone turned off the light and locked the door.

31. While Plaintiff banged on the door to be let out, Scavetti approached her from behind, put his hands on her waist and said "Oh baby!"

32. Plaintiff banged harder on the door and told Scavetti to stop.

33. The door was unlocked and Plaintiff ran out of the room to see Snyder and DiAntonio there.

34. She asked who had locked the door and Snyder told her he had not done it and Anthony just smiled.

35. The three men laughed and Plaintiff told them never to do it again and told Scavetti specifically never to touch her that way again.

36. Scavetti replied by saying, "Come here baby, I'm sorry" with a big smile on his face.

37. The sexual harassment would intensify during periods of time when Scavetti was unmarried and without a girlfriend.

38. During such times he would continuously proposition and sexually harass Plaintiff by the following conduct:

- a. Telling Plaintiff he could not stand to be alone and asking her if she wanted company;
- b. Telling Plaintiff that he liked women who were "active" in bed;
- c. Telling Plaintiff how much he likes breasts and how they feel, then asking Plaintiff if he could see and touch her breasts and at times reaching out to attempt to grab Plaintiff's breasts;
- d. Telling Plaintiff that he needed to have sex because he was so horny;
- e. Asking Plaintiff if she liked fellatio;
- f. Asking Plaintiff if she was good at performing fellatio;
- g. Asking Plaintiff if she liked to be on top during sex;
- h. Putting his arm around Plaintiff and telling her that he loved women and their bodies, that he liked to touch all of a woman's body parts, and that he loved to make women "cum;"

- i. Asking Plaintiff to describe her undergarments;
- j. Asking Plaintiff what she wore to bed;
- k. Asking Plaintiff is she ever cooked in the nude;
- l. Asking Plaintiff if he could shower with her.

39. Plaintiff often asked Scavetti to stop making such comments and to leave her alone.

40. Scavetti's harassment of Plaintiff was witnessed by many Public Works employees, including, but not limited to, Butch Willis, Dan Ford, Anthony DiAntonio, Ray Romano, and Mary Romano.

41. Plaintiff also commented to many of her co-workers that Scavetti's sexual interest in her was unwelcome and troubling to her and that she wanted him to stop.

42. At least one such employee told Plaintiff that Scavetti was lonely and that she should let him move in with her.

43. Other employees joined in the sexual harassment by responding to innocent comments from Plaintiff with offensive speculations regarding her personal life. For example, if Plaintiff would comment that she was tired on a particular day, male employees such as Scavetti, Ford and DiAntonio would say things like "You got the one eye," "You got laid last night," or "You got some salami." If Plaintiff would comment that her back was sore on a particular day, the male employees would tell Plaintiff that Scavetti would "work out the kinks" for her and Scavetti would offer to rub her all over if she needed it.

44. The harassment was such that Plaintiff would ask for extra work to minimize her break time and avoid the interaction with her co-workers.

45. In addition to the sexual harassment, Plaintiff was also subjected to other acts of harassment such as giving Plaintiff an athletic supporter in place of a protective facemask, intentionally soiling Plaintiff's work vehicle, repeatedly spitting phlegm and saliva on the floor of the common work areas, and writing "Manning Tight Pants Off" on the 80th Street facility break room calendar.

46. Plaintiff complained to her superiors several times about the harassment, but received no response.

47. Specifically, Plaintiff complained to Scavetti verbally about the pervasive use of the word "fuck" and the fact that it was often directed at Plaintiff.

48. Plaintiff complained in writing to Scavetti about the use of foul language and the spitting on February 6, 8, and 11, 2008. No action was taken on Plaintiff's complaints.

49. Instead, Scavetti told Plaintiff that he was frustrated with her whining and causing problems and that he would prefer not to be her supervisor. ✓

50. From the time she was hired to the present, Plaintiff has endured a constantly hostile work environment caused by the following offensive and frightening actions/conduct of her co-employees:

- a. A male co-employee exposing his bare buttocks on several occasions in the workplace;
- b. A male co-employee often taking out a large pocket knife and waving it around in the workplace, one day cutting a co-employee, and routinely displaying knives to the other employees by piercing table tops with the blades and playing with them in an obvious attempt to intimidate other employees;

- c. The same male co-employee accompanying his knife play with statements that is co-employees had better "watch out when he retires" and that he "wanted revenge on people who had messed with him;"
- d. The same male co-employee talking about the violent things he would do to other people if he could, such as cutting them, killing them, or "pissing on their graves;"
- e. Co-employees using the word "nigger" regularly and more frequently around Plaintiff after learning that she was mother to two sons of half African-American descent; and
- f. Co-employees calling one another "monkey" while also using the word "nigger."

51. Plaintiff was afraid to complain about her co-employees' offensive language because of how employees who has spoken up in the past had been treated and because her supervisor, Scavetti, had long been one of her harassers.

52. Plaintiff was specifically targeted for harassment by DiAntonio.

53. DiAntonio's offensive behavior and language (he routinely used words such as: "nigger," "pussy," "bitch," "asshole," "mother-fucker," and others) typically escalated when he was angry.

54. DiAntonio's mother-in-law is Commissioner of Public Works, and it was clear to Plaintiff that that relationship insulated DiAntonio from any punishment for his hostile, offensive and discriminatory behavior.

55. After another incident in Summer 2005 in which DiAntonio interrupted a conversation between Plaintiff and Scavetti to shout at Plaintiff in offensive, profane and

hostile language and during which not one person, including Plaintiff and DiAntonio's superior, Scavetti, told DiAntonio to stop abusing Plaintiff, Plaintiff requested a meeting with the Public Works Director, John Manganero ("Manganero") to discuss the hostile work environment to which she was being subjected.

56. Plaintiff made this request in writing on her Daily Work Report.

57. Plaintiff received no response to her request until after she made two (2) additional written requests for a meeting with Manganero to discuss the hostile work environment.

58. A meeting was then set up for 10 a.m. on a Wednesday.

59. The meeting was attended by Manganero, Scavetti, Mike Snyder, Jerry Rutledge (the union shop steward), and Plaintiff and occurred in the Commissioner's Office at the 40th Street Shop Building.

60. During this meeting Plaintiff told the attendees about D'Antonio's abusive and hostile behavior, the frequent use of the word "nigger" by D'Antonio and other employees, and other examples of workplace hostility to which she had been subject.

61. Specifically, Plaintiff told the meeting's attendees about having been improperly denied an offer of overtime that should have been extended to her based on her seniority and Scavetti's overtly hostile response when she asked him about it.

62. During that incident, which occurred on July 27, 2005, Plaintiff approached Scavetti in the parking lot outside of the 40th Street Shop and asked if they could discuss overtime, to which Scavetti said, "what's the problem now?"

63. Plaintiff calmly told Scavetti that she should have been asked first to cover John J.'s overtime based on her seniority.

64. Scavetti then told Plaintiff that she "should see a doctor for all of [her] problems" and that she "needed help."

65. Plaintiff told Scavetti that his comment was uncalled for and that she was going to walk away before he said anything else to offend her.

66. Scavetti then became so angry that he physically lunged toward Plaintiff, but lost his footing and almost fell on the stones, giving Plaintiff a chance to get into her van.

67. Scavetti then approached the window of Plaintiff's van yelling that they should take it up with Bobby McKeefry, Assistant Superintendent, and that he was going to tell him what had just happened.

68. Plaintiff was shocked and upset by Scavetti's reaction, but continued her work for the day.

69. At the end of her shift, Scavetti approached Plaintiff and, still obviously angry, asked Plaintiff which of John J.'s shifts she wanted.

70. Prompted by the incident with Scavetti, Plaintiff again requested a meeting with Manganero and was told she should follow the chain of command.

71. Plaintiff then went to McKeefry and told him about the incident with Scavetti in the parking lot and that she was frightened of him because of the way he had reacted to her simple request to discuss the overtime assignments.

72. At that time McKeefry told Plaintiff that Scavetti had come to him the day of the incident with Plaintiff and that McKeefry had told Scavetti that he may need to be refreshed as to how overtime assignments were to be offered because it was based on seniority.

73. McKeefry then told Plaintiff that he would speak to Scavetti about the incident.

74. The meeting with Manganero, Scavetti, Snyder, Rutledge, and Plaintiff to discuss the hostile work environment followed.

75. After Plaintiff detailed the hostile work conditions during the meeting, Manganero said that he would fire anyone who used the word "nigger" without hesitation, but Plaintiff never heard another word about any of the incidents she described at the meeting and never received even a simple apology for the way she had been treated by the other employees.

76. The only action taken in response to Plaintiff's reporting of the hostile work environment was an in-house seminar that was given regarding work place harassment.

77. For a period of time following the seminar Plaintiff's co-workers stopped cursing and yelling at her, but stopped speaking to Plaintiff at all unless they had to.

78. In time, the hostile and harassing work environment resumed and continues to this day.

79. In 2003, Plaintiff inquired of Pat LaRosa ("LaRosa") as to how and when she could obtain a promotion and was told that after being a full-time employee for one year she should already have been bumped up to the next position.

80. Plaintiff noted that two employees, both male, who had been hired after her had already been promoted and that she had not.

81. Plaintiff advised LaRosa that she would do whatever work she needed to do to obtain the promotion, including work on the back of a garbage truck.

82. LaRosa then told Plaintiff that he "would not put a woman on the back of a garbage truck."

83. LaRosa also told Plaintiff that there was no money for a promotion for her, but he would see if he could get her paid from May to September at the rate she would be paid if she were promoted.

84. In May of that year Plaintiff met with LaRosa and Angel Dalrymple ("Dalrymple"), Commissioner of Public Works, to discuss a raise for Plaintiff.

85. At that point, Plaintiff was working out of title, supervising two other employees.

86. Plaintiff, again, stated that she would be willing to do any type of work necessary to receive a promotion, including work on the back of a garbage truck.

87. Dalrymple told Plaintiff that that was not what Plaintiff was hired for and that Dalrymple would not allow Plaintiff to work on a garbage truck.

88. Ultimately, Plaintiff was moved to a lateral position (from laborer to Building Maintenance Worker) for a year, making it June 2004 before Plaintiff would receive any promotion.

89. In April 2005 a Civil Service Desk Audit requested by Plaintiff determined that Plaintiff should have had the title of Senior Building Maintenance Worker.

90. At the time of the desk audit there was an open Senior Building Maintenance Worker position open and Plaintiff submitted an application for the position.

91. Plaintiff's Civil Service test results ranked her number one in line for the position, but it was not given to her.

92. In 2007 Plaintiff requested a meeting with Manganaro to discuss overtime assignments.

93. The meeting was attended by Plaintiff, Plaintiff's Union Representatives, Plaintiff's immediate supervisor, and Director Managanero.

94. During the meeting Plaintiff asked why she could not be on the list to work overtime shifts in any area other than janitorial, to which Plaintiff's Supervisor responded that she could not work other overtime jobs because they were "man's work" and that the equipment was "too heavy" for Plaintiff.

95. Director Manganero responded that he was afraid to allow Plaintiff to work any overtime other than janitorial because Plaintiff had previously been out with work related injuries. Manganero said this despite the fact that Plaintiff had been released by her physicians with no work restrictions whatsoever.

96. Again in Spring 2008, Plaintiff asked to be assigned overtime for work other than janitorial such as garbage pick-up, recycling pick-up, depot yard duty, and concerts.

97. Again, Plaintiff was told by her supervisor that she would not be offered any such overtime because it women cannot perform such duties and that he needs men on those jobs.

98. Again, Manganaro said that he would not allow Plaintiff to be offered overtime shifts doing such work because she had previously suffered workplace injuries despite the fact that Plaintiff's surgery had been performed two years prior and she had long since been cleared for work without restrictions.

99. No explanation was given to Plaintiff as to why she could not work overtime shifts in the depot yard where her only duties would be directing the public as to where to put their trash and recyclables and no heavy lifting would be required.

100. From Spring 2008 on Plaintiff has had to share any available janitorial overtime shifts with another employee, which drastically limits her overtime opportunities as compared to prior years.

101. Despite the fact that Plaintiff is a long-standing, full-time, year-round employee, she is the only employee who is limited to one overtime opportunity per week and to overtime in only one area (janitorial), while seasonal and part-time employees are frequently offered various overtime opportunities, including shifts in the depot yard.

102. The intentional denial of overtime opportunities to Plaintiff is so open and obvious that Plaintiff's name was not even put on the overtime sign-up sheet for the Summer of 2008.

103. On July 28, 2009 Plaintiff was supposed to meet with Lisa Rutledge regarding Plaintiff's need to take time off under the Family Leave Act to care for her son who had broken his leg and undergone surgery on July 25, 2009.

104. When Plaintiff arrived for the meeting she was confronted by Lee Nugent, Andre Cipaldi, Rutledge, and Manganero. No union representative was present to represent Plaintiff's interests.

105. The meeting attendees wanted to know Plaintiff's plans for her job, with Manganero stating that since he had been in his position Plaintiff had been out of work more than she had worked.

106. Plaintiff pointed out that her son's surgery was on Sunday and she was there on Tuesday because she knew she was needed.

107. Plaintiff then asked if she could come in at 4 AM so that she could get more work done and was told that she could not because they did not want a woman working that early with no men present.

108. In early 2010 Plaintiff was given a new schedule for Janitorial staff. Plaintiff was partnered with Ron Miller, who was working under an ADA classification and had related work limitations.

109. Plaintiff and Miller were assigned the heaviest workload because the buildings they were assigned to clean were used by the most people.

110. Plaintiff and Miller's workload was also increased by the fact that the buildings they were assigned were two story buildings and one of Miller's limitations was that he could not use stairs. Of the buildings that Plaintiff and Miller were assigned, most did not have working elevators.

111. When Plaintiff protested the unfairness of she and Miller being given the heaviest workload, a new schedule was posted that added a building to Plaintiff and Miller's assignment that was very heavily used by the public.

112. Two of the Plaintiff's co-workers, Butch Smith and Dan Fay, held higher titles than Plaintiff despite having been hired five or more years after Plaintiff.

113. Instead of taking action to remediate the hostile work environment to which Plaintiff has been subject and the harassing and retaliatory actions that had been taken against her, in response to Plaintiff's complaints Manganero has told Plaintiff that she needs therapy.

114. As a direct and proximate result of the defendant's conduct, the plaintiff has been subjected to discrimination, disparate treatment, retaliation, sexual harassment, and a hostile work environment comparable to that which has been recognized as sufficient to support a claim for relief under Shepherd v. Hunterton Developmental Center, 336 N.J. Super. 395, 404, 765 A.2d 217 (App. Div. 2001), *aff'd in relevant part, rev'd in part and remanded*, 174 N.J. 1 (2002); Green v. Jersey City Board of Education, 177 N.J. 434 (2003); and Mancini

v. Township of Teaneck, 349 N.J.Super. 527, 568-569 (App. Div. 2002), *mod and aff'd*, 174 N.J. 425 (2004).

115. The conduct of the defendant as described herein was willful, wanton, intentional, occurred with actual malice, and is especially egregious, involving members of upper management.

116. As a direct and proximate result of the defendant's conduct directed against the plaintiff in violation of the Law Against Discrimination, N.J.S.A. 10:5-1, *et seq.*, including its provisions precluding, gender discrimination, disparate treatment, hostile work environment, reprisal, the plaintiff has been damaged.

WHEREFORE, plaintiff demands judgment against the defendant for compensatory damages, punitive damages, interest, attorney's fees, costs of suit, and such other relief as is just and equitable, which equitable relief should include, in part, additional anti-discrimination and anti-retaliation training, disciplinary charges against the individuals that discriminated and retaliated against the plaintiff, and a Court appointed monitor to over see Sea Isle City.

VAN SYOC CHARTERED

Attorneys for the Plaintiff

BY: 
CLIFFORD L. VAN SYOC

Dated: 3.24.10

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury as to all issues.


CLIFFORD L. VAN SYOC

DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Clifford L. Van Syoc, Esquire as trial counsel in this matter.

3-24-10

BY: Clifford L. Van Syoc
CLIFFORD L. VAN SYOC

CERTIFICATION

The undersigned counsel certifies that there are no other actions or arbitrations pending or contemplated involving the subject matter of this controversy at this time, and there are no additional known parties who should be joined to the present action at this time. I certify the foregoing to be true. I am aware if the above is willfully false, I am subject to punishment.

BY: Clifford L. Van Syoc
CLIFFORD L. VAN SYOC

DATED: 3-24-10

RULE 1:4-8 DEMAND

Plaintiff and her counsel hereby demand, pursuant to Rule 1:4-8, that the defendants or their agents, servants, or employees, or attorneys provide any and all facts and documents upon which they base any contention that this Complaint was instituted or continued in whole or in part for improper reasons, or that the claims are, in whole or in part, frivolous or without basis in law or fact.

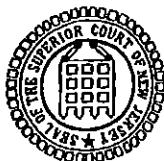
3-24-10

BY: Clifford L. Van Syoc
CLIFFORD L. VAN SYOC

CIVIL CASE INFORMATION STATEMENT

(CIS)

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



FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA
CHG/CK NO.
AMOUNT:
OVERPAYMENT:
BATCH NUMBER:

ATTORNEY/PRO SE NAME Clifford L. Van Syoc, Esquire		TELEPHONE NUMBER (856) 429-6444	COUNTY OF VENUE Cape May
FIRM NAME (If applicable) Van Syoc Chartered		DOCKET NUMBER (When available) CAM L-2009-10	
OFFICE ADDRESS 401 South Kings Highway, Building 1 Cherry Hill, NJ 08034		DOCUMENT TYPE Complaint	
NAME OF PARTY (e.g., John Doe, Plaintiff) Samantha Muller - Plaintiff		CAPTION Muller v. Sea Isle City	
CASE TYPE NUMBER (See reverse side for listing) 618	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, LIST DOCKET NUMBERS		
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 checked="" type="checkbox"/> UNKNOWN		

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	IF YES, IS THAT RELATIONSHIP <input checked="" type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input checked="" 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:	

<input checked="" type="checkbox"/> DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION:
<input type="checkbox"/> 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: *Sylvester B...*