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Attorneys for Plaintiff, Alyssa Sanchez

<p>ALYSSA SANCHEZ,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>VERANO NJ LLC; VZL STAFFING SERVICES LLC; LARRY WHARTON; KEN MERCED; LATOYA BYNUM; KIM TORRES; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION SOMERSET COUNTY DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">COMPLAINT & DEMAND FOR TRIAL BY JURY; FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS</p>
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Plaintiff Alyssa Sanchez (“Plaintiff”), by way of Complaint against Defendant Verano NJ LLC (“Defendant Verano”), Defendant VZL Staffing Services LLC (“Defendant VZL”), Defendants ABC Corporations 1-5 (fictitious names describing presently unidentified business entities) (along with “Defendant Verano” and “Defendant VZL,” collectively referred to as “Corporate Defendants” or “the Verano Defendants”), Defendant Larry Wharton (“Defendant Wharton”), Defendant Ken Merced (“Defendant Merced”), Defendant Latoya Bynum (“Defendant Bynum”), Defendant Kim Torres (“Defendant Torres”), and Defendants John Does 1-5 (fictitious

names describing presently unidentified individuals) (along with “Defendant Wharton,” “Defendant Merced,” “Defendant Bynum,” and “Defendant Torres,” collectively referred to as the “Individual Defendants”), alleges as follows:

PRELIMINARY STATEMENT

Plaintiff Alyssa Sanchez is a former Security Guard for Corporate Defendants who was forced to endure a work-environment rife with relentless sexual harassment, gender discrimination, and retaliation in a textbook violation of the New Jersey Law Against Discrimination N.J.S.A. 10:5-1, et seq, (hereinafter the “NJLAD”). The primary source of utterly intolerable work environment was Plaintiff’s manager, Defendant Larry Wharton. Defendant Whartons’ penchant for misogyny and harassment was seemingly limitless. For example, Defendant Wharton frequently asked Plaintiff intimate details about her sex life. Additionally, Defendant Wharton gratuitously called Plaintiff on multiple occasions to tell her, **“I thought about you last night.”**

Moreover, the facts conclusively reveal Defendant Wharton went to almost absurd lengths to be near Plaintiff on an almost daily basis. He consistently sought out and surveilled Plaintiff’s every move in an attempt to engage her in a romantic and/or sexual relationships. This was confirmed when he admitted to inappropriately watching Plaintiff via the company’s security cameras. Additionally, Defendant Wharton routinely stared at Plaintiff for absolutely no legitimate reason, causing her to become extremely uncomfortable.

At her wits’ end, Plaintiff complained about Defendant Wharton’s behavior to her Production Manager, Defendant Merced. Defendant Merced admitted to receiving complaints about Defendant Wharton from other female employees in the past. Defendant Merced then promised Plaintiff there would be a meeting to discuss her concerns. Nevertheless, Plaintiff had to

consistently follow up with Defendants about her concerns. Although a meeting did eventually occur, her complaints were brushed aside, and she was immediately subject to reprisal. In fact, Plaintiff ended up being escorted out of the building by a security guard. Later that same day, Plaintiff's union representative informed her that Defendants claimed she resigned her position from the company. Fortunately, New Jersey's broad and liberally construed Law Against Discrimination, N.J.S.A. 10:5-1, et seq., provides redress for employees subjected to such outrageous and unlawful conduct. Thus, Plaintiff brings this action to vindicate her rights to a safe workplace free from sexual harassment.

PARTIES

1. Plaintiff is an individual residing in Somerville, New Jersey and, at all times relevant hereto, was employed by Defendant Verano as a Security Guard at their indoor cultivation facility located at 35-72 U.S. Route 22 West, Somerville, NJ 08876.

2. Defendant Verano is a national operator of licensed cannabis cultivation, manufacturing, and retail facilities, with an indoor cultivation room located at 35-72 U.S. Route 22 West, Somerville, NJ 08876. Defendant Verano maintains a principal place of business located at 35-72 U.S. Route 22 West, Somerville, NJ 08876 (the "Somerville facility"). At all times relevant hereto, Defendant Verano is an "employer" as defined under the NJLAD and Plaintiff's employer.

3. Defendant VZL is a staffing agency that is duly authorized to do business in the State of New Jersey, with a principal place of business located at 415 North Dearborn Street, Suite 400, Chicago, Illinois 60654-4696. At all times relevant hereto, Defendant VZL is an "employer" as defined under NJLAD.

4. Defendant Wharton, at all times relevant herein, is a manager employed by the Verano Defendants. Accordingly, this claim is brought by Plaintiff against Defendant Wharton in his individual capacity and/or as an agent or servant of the Verano Defendants who aided and abetted the discrimination and retaliation referenced herein. At all times relevant hereto, Defendant Wharton is an “employee” as defined under the NJLAD.

5. Defendant Merced, at all times relevant herein, is a Production Manager employed by the Verano Defendants. Accordingly, this claim is brought by Plaintiff against Defendant Merced in his individual capacity and/or as an agent or servant of the Verano Defendants who aided and abetted the discrimination and retaliation referenced herein. At all times relevant hereto, Defendant Merced is an “employee” as defined under the NJLAD.

6. Defendant Bynum, at all times relevant herein, is a Human Resources (“HR”) Manager employed by the Verano Defendants. Accordingly, this claim is brought by Plaintiff against Defendant Bynum in her individual capacity and/or as an agent or servant of the Verano Defendants who aided and abetted the discrimination and retaliation referenced herein. At all times relevant hereto, Defendant Bynum is an “employee” as defined under the NJLAD.

7. Defendant Torres, at all times relevant herein, is a HR Manager employed by Defendant Verano. Accordingly, this claim is brought by Plaintiff against Defendant Torres in her individual capacity and/or as an agent or servant of the Verano Defendants who aided and abetted the discrimination and retaliation referenced herein. At all times relevant hereto, Defendant Bynum is an “employee” as defined under the NJLAD.

8. Upon information and belief, Defendants ABC Corporations 1-5 are currently unidentified business entities that acted in concert with the Verano Defendants and/or currently

unidentified business entities responsible for the creation and/or implementation of anti-retaliation policies of the Verano Defendants, and/or currently unidentified business entities that may have liability for the damages suffered by Plaintiff under any theory advanced herein.

9. Upon information and belief, Defendants John Does 1-5 are currently unidentified individuals who have acted in concert, aided and abetted, were complicit in, engaged in, and/or encouraged conduct with regard to the instant matter and/or were responsible for the creation and/or implementation of anti-retaliation policies of the Verano Defendants and are currently unidentified individuals who may have liability for the damages suffered by Plaintiff under any theory advanced herein.

10. At all relevant times, Defendant Verano and Defendant VZL have been single and joint employers of Plaintiff within the meaning of the NJLAD. Upon information and belief, Defendant Verano and Defendant VZL's operations are interrelated and unified, and they share common management, centralized control of labor relations, common ownership, common control, common business purposes, and interrelated business goals. In addition, they jointly determine and manage the pay practices, rates of employee pay and method of payment, maintenance of employee records and personnel policies, practices, and decisions with respect to the employees.

FACTS COMMON TO ALL CLAIMS

11. Corporate Defendants claim, at all times relevant hereto, that they had in effect at their facilities and locations within the State of New Jersey specific policies prohibiting sexual harassment, gender-based discrimination, and retaliation.

12. Corporate Defendants claim, at all times relevant hereto, that they had in effect at their facilities and locations within the State of New Jersey a zero-tolerance policy when it comes to sexual harassment, gender-based discrimination, and retaliation.

13. Corporate Defendants claim, at all times relevant hereto, that they had in effect at their facilities and locations within the State of New Jersey policies and procedures requiring an employee who believes he or she was the victim of sexual harassment, gender-based discrimination, or retaliation to report the harassment, discrimination, or retaliation to supervisory and management staff.

14. Corporate Defendants claim, at all times relevant hereto, that they had in effect at their facilities and locations within the State of New Jersey policies and procedures whereby they would engage in a timely and effective investigation of complaints of sexual harassment, gender-based discrimination, or retaliation brought to their attention by employees.

15. Corporate Defendants claim, at all times relevant hereto, that they had in effect at their facilities and locations within the State of New Jersey policies and procedures committing them to engage in a timely and effective investigation of complaints of sexual harassment, gender-based discrimination, or retaliation brought to their attention by employees.

16. Corporate Defendants claim, at all times relevant hereto, that they had in effect at their facilities and locations within the State of New Jersey policies and procedures committing to undertake prompt and effective remedial measures to put a stop to any sexual harassment, gender-based discrimination, or retaliation they found to exist.

17. Corporate Defendants claim, at all times relevant hereto, that they had in effect at their facilities and locations within the State of New Jersey policies prohibiting retaliation against

an employee who discloses to a supervisor or manager any conduct engaged in by the company or a coworker which the employee reasonably believes is or was contrary to laws or public policy.

18. On or about April 9, 2022, Plaintiff commenced employment with Defendants as a Harvest Cultivist at Defendant Verano's Somerville facility. Throughout her employment, Plaintiff performed her job responsibilities competently and diligently, loyally dedicated to Defendants, their mission, and the clients which they serve.

19. As a testament to her exceptional job performance and Defendants' trust in Plaintiff, Defendants promoted Plaintiff to a position as Security Guard. Unfortunately, despite Plaintiff's demonstrated ability to maintain the very highest level of job performance, her employment came to a grinding halt when she found herself subjected to an intolerably hostile work environment rife with sexual harassment and discrimination.

A. Plaintiff is Subjected to Repeated Sexual Harassment and Gender-Based Discrimination at the Hands of Defendant Wharton.

20. From the outset her employment with Corporate Defendants, it was clear to Plaintiff that Defendant Wharton, who was Plaintiff's direct supervisor, had a predilection for inappropriate behavior. Plaintiff quickly became the latest victim of Defendant Wharton's harassment after she was hired.

21. Specifically, upon learning Plaintiff was married to another woman, Defendant Wharton asked Plaintiff intimate details about her sex life and her marriage. Plaintiff was unwilling to discuss same with Defendant Wharton, especially while at work.

22. Unfortunately for Plaintiff, questioning Plaintiff about her sex life was not the only way Defendant Wharton pushed professional boundaries.

23. On one occasion, Defendant Wharton called Plaintiff on her day off to tell her, **“I thought about you last night.”**

24. The purpose of Defendant Wharton’s call was to complain that Plaintiff was not at work that day and that two of Plaintiff’s co-workers had to cover her shift.

25. Defendant Wharton subjected Plaintiff to countless other harassing, misogynistic, and lewd comments, all of which added fuel to the intolerably hostile work environment he had already created.

26. For example, Defendant Wharton frequently compared Plaintiff to his wife.

27. Each time Defendant Wharton made inappropriate comments to Plaintiff, Plaintiff made it clear to Defendant Wharton she wished to keep their relationship professional.

28. However, Plaintiff’s attempts to dissuade Defendant Wharton from behaving inappropriately toward her did not deter him.

29. In yet another attempt to discourage Defendant Wharton’s behavior, Plaintiff reminded him again that she was married.

30. However, knowing Plaintiff was married did not make Defendant Wharton stop acting inappropriately toward her.

31. Rather, knowing Plaintiff was married seemed to have the opposite effect than what Plaintiff intended, as Defendant Wharton’s harassing conduct only intensified.

32. Defendant Wharton made his infatuation with Plaintiff very clear by way of his relentless harassing behavior.

33. By way of example, but not limitation, Defendant Wharton tried very hard to isolate Plaintiff from her co-workers due to his open favoritism of her.

34. On several occasions, Defendant Wharton openly lauded Plaintiff's work performance while harshly criticizing that of her female coworkers, pitting them against one another seemingly for his own perverse amusement.

35. By way of further example, Defendant Wharton constantly searched for Plaintiff throughout the workplace, eager to engage with Plaintiff at every possible opportunity. Plaintiff routinely noticed him hovering nearby her on purpose, and if Plaintiff was engaged in a conversation with another co-worker, Defendant Wharton would simply stare at Plaintiff intensely.

36. Understandably, Defendant Wharton's unrelenting, claustrophobic presence throughout Plaintiff's workday made her extremely uncomfortable.

37. Just when Plaintiff thought Defendant Wharton's behavior could not possibly get any worse, Plaintiff discovered he frequently watched her through the security cameras at work.

38. Suffice to say, Plaintiff felt extremely violated by Defendant Wharton's comments and conduct. After enduring such endless and persistent sexual harassment by Defendant Wharton, it was clear to Plaintiff that the terms and conditions of her employment had irrevocably changed for the worse, and that her work environment was hostile.

B. Defendant Wharton Ignores Plaintiff's Safety Concerns.

39. On or about July 1, 2022, a maintenance worker approached Plaintiff and showed her a video of what appeared to be male ejaculate on multiple surfaces of an employee restroom.

40. The maintenance worker showed Plaintiff this video because Plaintiff was responsible for patrolling the restroom area where this occurred.

41. Reasonably concerned for her health and safety, Plaintiff mentioned the incident to Defendant Wharton.

42. Defendant Wharton could not have cared less about Plaintiff's concerns. He did nothing in order to investigate the situation or ensure Plaintiff felt safe.

C. Plaintiff Complains to Defendant Merced About Defendant Wharton.

43. On or about July 6, 2022, Plaintiff brought her many concerns regarding Defendant Wharton to Defendant Merced.

44. In addition to voicing her concerns about Defendant Wharton's tactless behavior, Plaintiff informed Defendant Merced of the interaction she had with Defendant Wharton the previous day.

45. The day prior to her meeting with Defendant Merced, Plaintiff asked Defendant Wharton if she could be assigned overtime. Defendant Wharton denied Plaintiff's request without reasonable justification, and instead questioned her relentlessly about her personal reasons for requesting overtime in the first place.

46. Defendant Merced conceded that Defendant Wharton handled the situation inappropriately and assured Plaintiff she would be assigned some overtime hours.

47. That same night, while Plaintiff was working overtime, Defendant Merced apologized to Plaintiff on behalf of Defendant Wharton and admitted to Plaintiff he had received several complaints about Defendant Wharton from other employees.

48. At the end of Plaintiff's conversation with Defendant Merced, Defendant Merced promoted Plaintiff from Security Guard to Security Supervisor. This was Plaintiff's second promotion within six (6) months of working for Defendants.

49. The next day, on or about June 7, 2022, Defendant Wharton was not scheduled to work. Nonetheless, he came into the work dressed in normal clothing and called Plaintiff on her personal cell phone. On the phone, Defendant Wharton again told Plaintiff, **“I was thinking of you last night.”**

50. Defendant Wharton proceeded to confront Plaintiff and ask her, “what’s wrong with you,” and “what’s going on in your life that you need overtime.”

51. Defendant Wharton proceeded to tell Plaintiff that he saw her talking to Defendant Merced on the security cameras and that he was jealous. He told Plaintiff that she violated his trust and that he needs it back. Defendant Wharton proceeded tell Plaintiff, “I need you Aly¹.”

52. Plaintiff immediately went to Defendant Merced to inform him of her conversation with Defendant Wharton.

53. Defendant Merced informed Plaintiff he would have a meeting with Defendant Wharton and HR in order to address Defendant Wharton’s inappropriate and wildly harassing behavior.

54. On or about July 11, 2022, Plaintiff arrived to work and went to her locker to put her belongings away. While at her locker, Defendant Wharton came up to Plaintiff and attempted to speak with her. Plaintiff did her best to ignore him.

55. Once at her assigned work area, Plaintiff was patrolling the cameras when she noticed Defendant Wharton walking toward her. Defendant Wharton then ambushed Plaintiff and tried speaking to her yet again.

56. Plaintiff again went to Defendant Merced after her forced interaction with Plaintiff.

¹ Plaintiff was known and referred to as Aly throughout Corporate Defendant’s workplace.

57. Defendant Merced reassured Plaintiff that he and Plaintiff, along with Defendant Wharton, would have a meeting to discuss Plaintiff's concerns.

D. Plaintiff Involves Her Union Representative and Defendants Retaliate Against Her For Same and For Complaining About Defendant Wharton.

58. Afterward, Plaintiff spoke with Defendant Bynum in HR. Defendant Bynum told Plaintiff the meeting would occur later that same day. However, the meeting did not occur on that day.

59. Plaintiff's next day of work was July 13, 2022. On that day, HR still had not set up a meeting.

60. On or about July 13, 2022, desperate to voice her concerns about Defendant Wharton, Plaintiff called her on-site union representative. Plaintiff's union representative assured Plaintiff he would help her set up the meeting.

61. Only after Defendants were made aware that Plaintiff involved her union representative did they decide to schedule a meeting on July 14, 2022.

62. The meeting was between Plaintiff, Defendant Bynum, Defendant Torres, Defendant Merced, and Defendant Wharton. Plaintiff's union representative was also present at the meeting.

63. During the July 14, 2022 meeting, it was clear to Plaintiff her complaints were not going to be taken seriously.

64. For example, Defendant Bynum was on her computer and not paying attention the entire time. Defendant Bynum made comments about how the meeting was “too much for her” and walked out of the room.

65. Defendant Torres consistently said the meeting needed to hurry up and was hostile toward Plaintiff.

66. Defendant Wharton did not speak during the entirety of the meeting, nor was he asked any questions by Defendants.

67. Defendant Merced’s conduct during the meeting was also questionable, as he denied ever having promoted Plaintiff to the position of Security Supervisor.

68. Defendant Merced seemed to think Plaintiff’s issues stemmed from being denied overtime by Defendant Wharton, when in reality, Defendant Wharton’s harassing behavior was what Plaintiff was most concerned over.

69. Defendant Torres walked out of the meeting while telling Plaintiff she was causing issues. Plaintiff took this as her invitation to leave work for the day, and as she stood up, Defendant Torres yelled, “she has to go!”

70. Plaintiff was escorted out of the building by a male security guard, and at the same time, out of frustration, Plaintiff released her keys and her badge.

71. The next day, Plaintiff received a call from her outside union representative, Jonathan Powers (“Mr. Powers”), who informed Plaintiff that Defendants claimed Plaintiff resigned from her position.

72. By no means did Plaintiff intend to resign from her position with Defendants. Mr. Powers confirmed to Plaintiff, “we pretty much knew they would try to flip the script.”

73. On or about July 16, 2022, Plaintiff received a text from a former co-worker that said Plaintiff had been fired for getting into an altercation with Defendant Bynum.

74. It is clear Defendants completely fabricated the reason why Plaintiff's employment ended.

75. Had she not complained about Defendant Wharton, Plaintiff would still be employed with Defendants.

COUNT ONE

NJLAD –SEXUAL HARASSMENT & HOSTILE WORK ENVIRONMENT

76. Plaintiff repeats each and every allegation set forth above as if set forth fully herein at length.

77. The pattern and practice of discrimination, harassment, and retaliation directed at Plaintiff is outlined above.

78. Plaintiff was subjected to repeated, pervasive, severe, and continuing instances of disparate treatment, harassment, and sexual assault based on her gender/sex.

79. The above-described conduct would not have occurred but for Plaintiff's gender/sex.

80. The harassing and discriminatory conduct was severe or pervasive enough to make a reasonable person and employee believe that the conditions of employment were altered, and the working environment was hostile and discriminatory.

81. As the employer and/or supervisor of Plaintiff, Defendants are vicariously, strictly, and/or directly liable to Plaintiff pursuant to the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, et seq., in that the affirmative acts of harassment, discrimination, and retaliation committed

by Individual Defendants occurred within the scope of their employment; the creation of a hostile work environment was aided by Defendant University Hospital in delegating power to Individual Defendants to control the day-to-day working environment; and/or Defendant University Hospital was deliberately indifferent, reckless, negligent and/or tacitly approved the discrimination, hostile work environment and/or retaliation; and/or Defendant University Hospital, Individual Defendants, and John Does 1-5 failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training and/or monitoring mechanisms for same, despite the foreseeability of harassment, discrimination, and retaliation in the workplace; and/or by having actual knowledge of the harassment, discrimination, and retaliation of Plaintiff and failing to promptly and effectively act to stop it.

82. Defendants aided, abetted, incited, compelled, and/or coerced, and/or attempted to aid, abet, incite, and/or coerce Individual Defendants and John Does 1-5 to commit acts and omissions that were in violation of the NJLAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering all Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e).

83. Individual Defendants and/or other supervisors of Plaintiff aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce Defendants to commit acts and omissions that were in violation of the NJLAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of their supervisory duty to halt or prevent harassment, retaliation, and discrimination rendering Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-2(e).

84. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiff has sustained damages.

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the law, punitive damages, emotional distress damages, pre-and post-judgment interest, and attorneys' fees and costs of suit. More specifically, Plaintiff demands judgment against Defendants for harm suffered in violation of the NJLAD as follows:

- A. Reinstatement of employment and all benefits;
- B. Back pay and benefits;
- C. Front pay and benefits;
- D. Compensatory damages;
- E. Consequential damages;
- F. Reinstatement;
- G. Punitive damages;
- H. Prejudgment interest and enhancements to off-set negative tax consequences;
- I. Any and all attorneys' fees, expenses and/or costs, including, but not limited to, court costs, expert fees and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to off-set negative tax consequences and/or enhancements otherwise permitted under law);
- J. Such other relief as may be available pursuant to the LAD and which the Court deems just and equitable;
- K. Ordering Defendants to take appropriate corrective action to stop and prevent retaliation at the workplace;
- L. Ordering Defendants to take appropriate corrective action to stop and prevent harassment at the workplace;
- M. Ordering Defendants to undergo anti-discrimination training;
- N. Ordering Defendants to undergo anti-retaliation training;
- O. Ordering Defendants to undergo anti-harassment training;
- P. Ordering Defendants to undergo workplace civility training;
- Q. Ordering Defendants to undergo bystander intervention training;
- R. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-discrimination training;
- S. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-retaliation training;

- T. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-harassment training;
- U. Ordering Defendants to engage a research organization to assess the effectiveness of their workplace civility training;
- V. Ordering Defendants to engage a research organization to assess the effectiveness of their bystander intervention training;
- W. Ordering Defendants to identify an appropriate professional to investigate any future complaints of discrimination;
- X. Ordering Defendants to identify an appropriate professional to investigate any future complaints of harassment;
- Y. Ordering Defendants to identify an appropriate professional to investigate any future complaints of retaliation; and
- Z. Such other relief as may be available and which the Court deems just and equitable.

COUNT TWO

NJLAD – RETALIATION/IMPROPER REPRISAL

85. Plaintiff repeats each and every allegation set forth above as if set forth fully herein at length.

86. Plaintiff complained and/or protested against the continuing course of harassing, discriminatory, and retaliatory conduct set forth at length above. Defendants had knowledge about those complaints and/or protests.

87. As a direct result, Defendants took retaliatory action against Plaintiff, which is outlined above.

88. Defendants are vicariously, strictly and/or directly liable to Plaintiff for unlawful retaliatory conduct in violation of the NJLAD pursuant to N.J.S.A. 10:5-12(d).

89. As a proximate result of the discriminatory and retaliatory actions undertaken by Defendants, Plaintiff has been and continues to suffer economic losses and pecuniary damage in the form of lost income and benefits past, present and future.

90. As a proximate result of the discriminatory and retaliatory actions undertaken by Defendants, Plaintiff has been and continues to suffer non-economic damages in the form of humiliation, stress, anger, sadness, and anxiety, causing her mental and emotional anguish and dysfunction, and physical manifestations of same, including, but not limited to, nervousness, anxiousness, sleeplessness, physical tremors, loss of appetite and loss of sleep, all or some of which may be permanent.

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants on this Court, together with compensatory and equitable relief, all remedies available under the law, punitive damages, emotional distress damages, pre-and post-judgment interest, and attorneys' fees and costs of suit. More specifically, Plaintiff demands judgment against Defendants for harm suffered in violation of the NJLAD as follows:

- A. Reinstatement of employment and all benefits;
- B. Back pay and benefits;
- C. Front pay and benefits;
- D. Compensatory damages;
- E. Consequential damages;
- F. Reinstatement;
- G. Punitive damages;
- H. Prejudgment interest and enhancements to off-set negative tax consequences;
- I. Any and all attorneys' fees, expenses and/or costs, including, but not limited to, court costs, expert fees and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to off-set negative tax consequences and/or enhancements otherwise permitted under law);
- J. Such other relief as may be available pursuant to the LAD and which the Court deems just and equitable;
- K. Ordering Defendants to take appropriate corrective action to stop and prevent retaliation at the workplace;
- L. Ordering Defendants to take appropriate corrective action to stop and prevent harassment at the workplace;
- M. Ordering Defendants to undergo anti-discrimination training;
- N. Ordering Defendants to undergo anti-retaliation training;

- O. Ordering Defendants to undergo anti-harassment training;
- P. Ordering Defendants to undergo workplace civility training;
- Q. Ordering Defendants to undergo bystander intervention training;
- R. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-discrimination training;
- S. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-retaliation training;
- T. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-harassment training;
- U. Ordering Defendants to engage a research organization to assess the effectiveness of their workplace civility training;
- V. Ordering Defendants to engage a research organization to assess the effectiveness of their bystander intervention training;
- W. Ordering Defendants to identify an appropriate professional to investigate any future complaints of discrimination;
- X. Ordering Defendants to identify an appropriate professional to investigate any future complaints of harassment;
- Y. Ordering Defendants to identify an appropriate professional to investigate any future complaints of retaliation; and
- Z. Such other relief as may be available and which the Court deems just and equitable.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to *Rule* 4:10-2(b), demand is made that Defendants disclose to Plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of the judgment which may be entered in this action, or indemnify or reimburse for payments made to satisfy the judgment, and provide Plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary insurance coverage, but also any excess, catastrophe, and umbrella policies.

DEMAND FOR TRIAL BY JURY

Plaintiff demands a trial by jury on all issues.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, PETER D. VALENZANO, ESQUIRE, is hereby designated as trial counsel for Plaintiff.

CERTIFICATION

Pursuant to Rule 4:5-1, it is hereby certified that, to the best of my knowledge, there are no other civil actions or arbitration proceedings involving this matter with respect to this matter and no other parties need to be joined at this time.

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

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

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ALYSSA SANCHEZ,

Plaintiff,

v.

VERANO NJ LLC; VZL STAFFING SERVICES LLC; LARRY WHARTON; KEN MERCED; LATOYA BYNUM; KIM TORRES; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
SOMERSET COUNTY

DOCKET NO.

Civil Action

PLAINTIFF’S FIRST SET OF INTERROGATORIES, FIRST DEPOSITION NOTICES, AND FIRST NOTICE TO PRODUCE TO DEFENDANTS

McOMBER McOMBER & LUBER, P.C.
54 Shrewsbury Avenue
Red Bank, New Jersey 07701
(732) 842-6500 Phone
Attorneys for Plaintiff, Alyssa Sanchez

PLEASE TAKE NOTICE that McOmber, McOmber and Luber, P.C., attorneys for Plaintiff Alyssa Sanchez (“Plaintiff”), demand that Defendant Verano NJ LLC, Defendant VZL Staffing Services LLC, Defendant Larry Wharton, Defendant Ken Merced, Defendant Latoya

Bynum, and Defendant Kim Torres produce true and complete copies of the following Document Requests and answer under oath the following Interrogatories pursuant to the Rules of Court. Interrogatories answers shall be typed beneath the questions and the original shall be returned in accordance with Rule 4:17-4(c) and, if at any time prior to trial, you obtain information which renders any answer you provide incomplete or inaccurate, amended answers shall be served pursuant to Rule 4:17-7. Both the Document Requests and Interrogatories shall be continuing so as to require supplemental responses and/or answers if Defendant(s) obtain(s) further documents or information between the time the response is served and the time of trial/hearing.

DEFINITIONS

1. “Plaintiff” shall mean, individually and collectively, each Plaintiff identified in the above-captioned action. If more than one Plaintiff is identified in the caption as a party to this lawsuit, Defendant(s) must respond to each request with specific responses applicable to each Plaintiff in this lawsuit.

2. “Defendant Verano” shall mean Verano NJ LLC, and any of its officers, directors, employees, agents, representatives, successors, predecessors, assigns, divisions, affiliates, subsidiaries, and all persons acting or purporting to act on its behalf.

3. “Defendant VZL” shall mean VZL Staffing Services LLC, and any of its officers, directors, employees, agents, representatives, successors, predecessors, assigns, divisions, affiliates, subsidiaries, and all persons acting or purporting to act on its behalf.

4. “Defendant Wharton” shall mean Larry Wharton, Defendant in the above-captioned action.

5. “Defendant Merced” shall mean Ken Merced, Defendant in the above-captioned action.

6. “Defendant Bynum” shall mean Latoya Bynum, Defendant in the above-captioned action.

7. “Defendant Torres” shall mean Kim Torres, Defendant in the above-captioned action.

8. “Defendant(s)” shall individually and collectively mean all Defendants in the above-captioned action.

9. The term “Corporate Defendant(s)” shall individually and collectively mean any Defendant company, corporation, partnership, union, joint venture, sole proprietorship, association, government agency, or organization, or any other similar type of group through which business is conducted, or any director, officer, employee, or agent thereof.

10. The term “Individual Defendant(s)” shall mean any Defendant in this matter sued in his/her individual capacity or as an agent/servant of any Corporate Defendant.

11. The terms “you,” “your,” or “yours” shall mean the party answering these interrogatory questions.

12. “Entity” shall mean any company, corporation, partnership, union, joint venture, sole proprietorship, association, government agency, or organization, or any other similar type of group through which business is conducted, or any director, officer, employee, or agent thereof.

13. “Person” shall mean any natural Person, partnership, corporation, or other business entity and all present and former officers, directors, agents, employees, attorneys and others acting

or purporting to act on behalf of such natural Person, partnership, corporation or other business entity.

14. The term “Action” shall mean the civil action captioned above.

15. The “Complaint” shall mean the Complaint filed by Plaintiff(s) in this Action.

16. The term “Answer” shall mean any Answer to the Complaint filed by any party in this Action, which specifically includes all Affirmative Defenses, Denials, and Counterclaims, and was filed with the Court in the above-captioned Action.

17. The term “Investigation” shall mean any investigation, inquiry, analysis, review, examination, research, study, interview, interrogation, and/or collection of evidence, statements (oral or written), and documents.

18. The term “Grievance” shall mean any complaint, grievance, accusation, allegation, protest, and/or objection (formal or otherwise) by Plaintiff(s) or any Person concerning any of the Defendant(s) and/or Plaintiff.

19. “Document” or “documents” is defined in accordance with New Jersey Court Rule 4:18-1 and includes the original and any identical or non-identical copy, regardless of origin or location, of any written, reported, filmed, magnetically stored, or graphic matter, or record of any type or description, whether produced, reproduced, or producible on paper, cards, tapes, film, electronic facsimile, computer storage devices, or any other media, including, but not limited to, memoranda, notes, minutes, records photographs, computer programs, correspondence, telegrams, diaries, bookkeeping entries, specifications, source code, object code, flow charts, financial statements, charts, studies, reports, graphs, statements, notebooks, handwritten notes, application, feasibility studies, agreements, books, pamphlets, periodicals, appointment calendars, notes,

records and recordings of oral conversations or voicemails, emails, inter-office or intra-office communications, handwritten or other notices, diaries, invoices, purchase orders, bills of lading, work papers, and also including, but not limited to, originals and all copies which are different from the original, whether by interlineation, receipt stamp, notation, indication of copy sent or received, or otherwise, and drafts, which are in the possession, custody or control of the present or former agents, representatives, employees, or attorneys of Defendant(s), or all persons acting on Defendant(s)' behalf, including documents at any time in the possession, custody or control of such Individuals or entities who are known by Defendant(s) to exist. Include any catalog, brochure, or any other data compilations from which information can be obtained and translated if necessary, or any other written, recorded, stored, transcribed, punched, taped, filed or graphic matter however produced or reproduced, to which Defendant(s) have or have had access.

20. The term "communication" means any conversation, correspondence, discussion, meeting, message, record of phone calls, or other occurrence in which data, conclusions, information, opinions, or thoughts are exchanged between two or more persons, whether it be written, oral, or electronically transmitted.

21. The terms "all" and "any" shall both be construed as "any and all."

22. The terms "and," "or," and "and/or" shall be construed in both the disjunctive and conjunctive to permit the broadest possible reading of the request so as to bring within the scope of the request documents and other material that might otherwise be construed to be outside the request.

23. The term "concerning" means concerning, comprising, constituting, containing, commenting on, dealing with, describing, discussing, embodying, evidencing, illustrating,

pertaining to, referring to, reflecting, regarding, relating to, responding to, stating, or supporting in any way, either directly or indirectly.

24. The phrases “relating to” or “relate to” or “relates to” or “refer to” or “refers to” or “referred” or “relating to” and/or “regarding” shall be construed in the broadest possible sense to mean, inter alia, concerning, referring to, embodying, constituting, describing, connected with, commenting on, responding to, evidencing, identifying, supporting, contradicting, rebutting, pertaining to, and/or relating in any way.

25. The term “including” or “include” shall mean “including without limitation.”

26. Masculine forms of any noun or pronoun shall embrace and be read to include the feminine or neuter, as the context may make appropriate.

INSTRUCTIONS

1. In addition to the specific instructions enumerated below, the following Document Requests and Interrogatories shall be subject to the New Jersey Rules of Court.

2. If more than one Plaintiff is identified in the caption as a party to this lawsuit, Defendant(s) must respond to each request with specific responses applicable to each Plaintiff in this lawsuit.

3. When referring to a person, “to identify” means to give, to the extent known, the person’s full name, present or last known address, and last known place of employment.

4. These Document Requests and Interrogatories shall be deemed continuing in nature so as to require prompt supplementation if, as, and when obtain additional information.

5. If anyone identified in response to any of the Document Requests and/or Interrogatories was formerly, but is no longer, employed by you, please so state in the answer and

provide the former employee's current address and telephone number (business or home), if known. If the current address and telephone number are not known, then please provide the former employee's last known address and telephone number.

6. You shall be under a continuing obligation to supplement answers to the Document Requests and Interrogatories.

7. If you cannot respond to any of the following Document Requests and/or Interrogatories in full after exercising due diligence to secure the information to do so, then respond to the extent possible and explain your inability to provide a complete answer. State whatever information or knowledge you have about the unanswered portion of any Document Request and/or Interrogatories.

8. Whenever a Document Request and Interrogatories asks for a date, state the exact day, month and year, if ascertainable or, if not, the best approximation thereof.

9. Documents shall be produced in their original state (i.e., in their original file folders in the exact order as found) without removal or rearrangement of anything contained therein.

10. Each document request that seeks information relating in any way to communications to, from, or within a business or entity is hereby designated to mean, and should be construed to include, all communications by and between that business and/or entity's present or former representatives, employees, agents, and servants of the business and/or entity.

11. All documents shall be organized and labeled to correspond with the numbered paragraphs of these document requests. If there are no documents responsive to a particular document request, Defendant(s) shall so state in writing.

12. All electronically stored information shall be produced in a reasonably usable form, and it shall not be converted from the form in which it is ordinarily maintained to a different form that would make it more difficult or burdensome for Plaintiff to use such information.

13. In the event that any document or portion thereof is withheld on the basis of any privilege or otherwise claimed to be protected against production, such document shall be identified by stating: (a) the nature of the privilege or reason for withholding which Defendant(s) contend applied; (b) the factual basis for Defendant(s)' assertion of privilege or the reason for withholding; (c) the type of document (e.g., letter, memorandum, etc.); (d) all authors and addressees; (e) all indicated and blind copies; (f) all persons to whom the document was distributed, shown, or explained; (g) the document's date; (h) a summary description of the document's subject matter; (i) the number of pages and attachments or appendices comprising the document; and (j) its present custodian.

14. Whenever a claim of privilege concerns any oral communication or statement, identify the participants to the communication and the person giving and receiving the statement, and set forth the date and place of the communication or statement and state the general subject matter thereof and state the basis for the claim of privilege.

15. If any document was, but is no longer, in Defendant(s)' possession, or subject to Defendant(s)' control, or in existence, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred, voluntarily or involuntarily, to others; or (d) has been otherwise disposed of. In each instance, explain the circumstances surrounding any such disposition, including the authorization of the disposition, the date of destruction or discard, the manner of destruction or discard and reason for destruction or discard, the persons who authored and carried

out such destruction or discard, whether any copies of the document presently exist, and, if so, the name of the custodian of each copy.

16. An objection or claim of privilege directed to part of a request does not constitute an excuse for failure to respond to the parts of the Document Request and/or Interrogatory for which no objection to claim of privilege is made.

17. If a refusal to answer a Document Request and/or Interrogatory is based on the grounds that the request is overly burdensome, identify the number and nature of documents needed to be searched.

18. Punitive Requests relate to Corporate Defendant(s)' financial condition for purposes of punitive damages. "Case law recognizes the defendant's financial condition as a relevant factor in all punitive-damage awards." Herman v. Sunshine Chemical Specialties, Inc., 133 N.J. 329, 339, (1993). In order to properly determine the appropriate punitive damage award amount, the trier of fact "must consider evidence of the Defendant's financial condition." Id. at 342. "The degree of punishment resulting from a judgment must be, to some extent, in proportion to the means of the guilty person. Restatement (Second) of Torts 908 comment d (1977)." McDonough v. Jorda, 214 N.J. Super. 338, 349 (1986), certif. denied, 110 N.J. 302 (1988) cert. denied, 489 U.S. 1065 (1989).

DOCUMENT REQUESTS TO DEFENDANT(S)

1. All documents relating to any insurance policy or reinsurance policy that may be used to pay all or part of any judgment entered against Defendant(s) in this Action.

2. A complete copy of the personnel file Defendant(s) maintained pertaining to Plaintiff, including but not limited to copies of documents (written or electronic) relating to the

following: (a) medical records and reports; (b) pay and benefits provided to Plaintiff; (c) attendance, sick time, disability time, personal time and/or vacation time; (d) commendations and/or performance reviews regarding Plaintiff; (e) job title or job status changes; (f) documents relating to any leave of absence; and (g) employer policy information provided to Plaintiff, if any.

3. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any Individual Defendant, including but not limited to copies of documents (written or electronic) relating to the following: (a) disciplinary action (i.e., oral reprimand, written reprimand, suspension, demotion, loss of pay, termination) being taken against any Individual Defendant; (b) performance evaluations that were conducted for any Individual Defendant; and (c) job title or job status changes for any Individual Defendant.

4. All documents and electronic data that relate to, refer to, discuss, or memorialize the Plaintiff's hiring.

5. All documents and electronic data that relate to, refer to, discuss, or memorialize the termination, demotion, suspension, separation, and/or resignation of Plaintiff.

6. All statements, documents, or communications relating to any complaints made by the Plaintiff.

7. Produce a copy of Defendant(s)' written policy concerning sexual harassment.

8. Produce a copy of Defendant(s)' written policy concerning retaliation.

9. Produce a copy of Defendant(s)' written policy concerning discrimination.

10. Produce a copy of Defendant(s)' written policy concerning progressive discipline.

11. All statements, documents, or communications relating to anti-harassment, anti-discrimination, and/or anti-retaliation training or education completed by Defendant(s).

12. All statements, documents, or communications concerning any Investigation that relates to the claims and defenses asserted in this Action.

13. A copy of all documents (written or electronic) relating to each and every instance since January 01, 2012, in which an allegation was made and/or a lawsuit filed alleging that Defendant(s) engaged in improper retaliation and/or reprisal in violation of New Jersey's Law Against Discrimination. For each and every such instance, identify the person(s) who made the allegation, the person(s) against whom the allegation was made, the date of the behavior complained of, the date the complaint was made, the nature of the behavior complained of, and how, if any way, you investigated, handled, processed, and/or ultimately disposed of each and every such matter.

14. A copy of all documents (written or electronic) relating to each and every instance since January 01, 2012, in which an allegation was made and/or a lawsuit filed alleging that Defendant(s) engaged in improper retaliation and/or reprisal in violation of New Jersey's Conscientious Employee Protection Act. For each and every such instance, identify the person(s) who made the allegation, the person(s) against whom the allegation was made, the date of the behavior complained of, the date the complaint was made, the nature of the behavior complained of, and how, if any way, you investigated, handled, processed, and/or ultimately disposed of each and every such matter.

15. All statements, documents, or communications concerning or made by any person that relate to the allegations asserted in the Complaint.

16. All statements, documents, or communications relating to statements of witnesses provided to and/or obtained by Defendant(s) that relate to this Action.

17. All statements, documents, or communications concerning or made by any Person (including any of Defendant(s)' employees or coworkers) that relate to the defenses, affirmative defenses, and/or denials asserted in the Answer.

18. All statements, documents, or communications concerning any agreement or contract between the Plaintiff and Defendant(s).

19. All statements, documents, or communications concerning any Person who has knowledge and/or information relating to this Action.

20. All statements, documents, or communications between the Plaintiff and Defendant(s) that relate to this Action.

21. All statements, documents, or communications concerning any admissions by or of Defendant(s) that relate to this Action.

22. All statements, documents, or communications concerning any of Defendant(s) denials of the allegations set forth in the Complaint.

23. All documents any expert who may testify on Defendant(s) behalf and which Defendant(s) intend to use or may rely upon at trial.

24. Copies of all books, documents, drawings, plans, photographs or other tangible things upon which Defendant(s) will rely in support of its defenses.

25. All statements, documents, or communications relating to any Grievance made by any non-party to this action concerning Defendant(s).

26. All documents Defendant(s) intend to use for any purpose in this litigation, including, but not limited to the data it intends to use in depositions or at trial.

27. All reports (including drafts) relating to any Investigation concerning Defendant(s) and/or the Plaintiff.

28. Any reports relevant to this matter written by an expert utilized by Defendant(s).

29. Copies of any and all books, treatises, pamphlets or other printed material upon which Defendant(s) or any experts retained by Defendant(s) will rely, including using as an exhibit at trial.

30. All documents concerning any employee Grievances against Defendant(s) for the past ten (10) years.

31. Copies of any photographs, video, text messages, iMessages, emails or other medium with regard to any communications between Defendant(s) and Plaintiff.

32. Copies of any photographs, video, text messages, iMessages, emails or other medium with regard to any communications between Defendant(s) and Defendant(s)' agents, servants or representatives referring and/or relating to the subject matter of this litigation.

33. A written job description for each position that Plaintiff held during Plaintiff's employment with Corporate Defendant(s).

34. A written job description for each position held by any Individual Defendant or any employee or agent of Defendant(s) during his/her tenure of employment with Corporate Defendant(s).

35. All statements, documents, or communications concerning any communication between Defendant(s) and Defendant(s)' Human Resources department regarding Plaintiff.

36. All documents identified or referenced in Defendant(s)' Answers to Plaintiff's First Set of Interrogatories to Defendant(s).

37. Produce a copy of the employee handbook in force and effect at the time of the Plaintiff's employment with Defendant(s).

38. All documents relating to Corporate Defendant(s)' policy or policies concerning electronic data retention and preservation.

39. All documents relating to any employee benefits or benefit plan in which the Plaintiff was/were eligible to participate during his/her employment with Defendant(s).

40. All documents or electronic data relating, reflecting, or referring to Defendant(s) policy or policies concerning employees' use of desktops and/or laptops (whether in office or remote locations) and management, preservation and/or deletion of data on such laptops.

41. All documents or electronic data relating, reflecting, or referring to Defendant(s) ability to restore archived electronic data relating to the Plaintiff's employment contained on electronic media such that upon restoration it may be accessed, viewed, exported or printed.

42. All statements, documents, or communications concerning any investigation concerning discrimination, harassment, hostile work environment and unfair favoritism complaints by employees and/or clients of Defendant(s) that relates to Defendant(s).

43. All statements, documents, or communications concerning any occasion in which Defendant(s) reprimanded or disciplined Plaintiff.

44. All statements, documents, or communications concerning Defendant(s) receiving any sensitivity training or any training regarding appropriate workplace language and conduct.

INTERROGATORIES TO DEFENDANT(S)

1. State with specificity each and every legitimate, non-discriminatory reason for why Defendants terminated Plaintiff's employment and the factual basis for the same.

2. Identify each and every individual who was involved in the decision to terminate Plaintiff's employment and describe each individual's role and input in the decision.

3. Identify the date, time and location of any meetings where the decision regarding whether to terminate Plaintiff's employment was discussed and identify each and every individual present at the meeting.

4. Identify each individual(s) who performed any of Plaintiff's job duties and/or responsibilities after his/her termination of employment from Defendants.

5. Indicate whether the individual or individuals certifying these Interrogatory answers had the opportunity to review the typed responses.

6. State the name, last known address, and last known telephone number of all persons who have knowledge of facts relating in any way to this matter and specify the subject matter of each such person's knowledge.

7. State the name, last known address, and last known telephone number of each person whom Defendant(s) may expect to call as a witness at trial and indicate those facts to which each such witness is expected to testify.

8. State the names and business addresses of any and all proposed expert witnesses whom Defendant(s) have retained for this matter.

9. With respect to each proposed expert witness referred to in the preceding Interrogatory, provide the following:

- a. field of expertise;
- b. educational background;
- c. the names of any and all books, periodicals, or other writings that he or she has written or to which he or she has contributed;

- d. the date, time, and place at which any oral opinion was rendered, specifying to whom that opinion was rendered and describing the content of that opinion;
- e. true and accurate copies of any and all written reports or opinions, including drafts;
- f. the name, last known address, last known telephone number, job title, and current employer of each person with whom the expert has met in connection with formulating his or her opinion or preparing his or her report(s);
- g. true and accurate copies of any and all documents that the expert created, obtained, or reviewed in connection with the formulation of his or her opinion or the preparation of his or her report(s);
- h. all tangible things upon which your expert(s) may rely as an exhibit at trial and identify the name and address of the person in whose custody the above identified tangible things are at the present time and;
- i. if any such reports, either written or oral, subsequently become known to you or become available, submit copies thereof to supplemental answers to these Interrogatories.

10. With respect to each proposed expert witness referred to in the preceding Interrogatory, set forth in summary form the substance of the opinion to which each is expected to testify, including a summary of grounds for each opinion.

11. Identify the names and addresses of any persons other than those named in the preceding three Interrogatories, who have been retained, specifically employed, or consulted by Defendant(s) in anticipation of litigation or preparation for trial and who may not be called as witnesses at trial and as to each:

- a. state the subject matter on which he/she was consulted;
- b. state his/her field of expertise;
- c. set forth the full and detailed qualifications, training, professional and practical experience, education and degree obtained by such person. (As to each item listed in the answer to this Interrogatory, set forth the dates and/or years of same, as well as the names and addresses of each institution attended; furthermore, set forth the nature of each place at which experience or training was received);
- d. attach to the answers to these Interrogatories copies of all written reports submitted to you (or detailed resume if report was oral) of each such expert;

- e. state whether or not there are any other reports in existence from the particular experts named, either written or oral (if any such reports, either written or oral, subsequently become known to you, or become available, submit copies thereof of supplemental answers to these Interrogatories);
- f. set forth completely all expert opinions rendered by the named expert(s) which are not in writing;
- g. identify each document that has been relied upon by each expert witness in the formulation of his or her opinion; and
- h. state a summary of the grounds for each opinion.

12. List chronologically each job title held by the Plaintiff while employed by any Defendant(s) indicating the time period during which each position was held.

13. For any position held by the Plaintiff while employed by Defendant(s) for which there is no job description, describe with specificity the job functions of each such position to the best of Defendant(s)' knowledge.

14. State the required qualifications and skills for each and every job title that the Plaintiff held while employed by any Defendant(s).

15. State whether the Plaintiff was/were ever promoted while employed by any Defendant(s). For each promotion, state the following:

- a. from what position or job title the promotion was from and to what position or job title the promotion was to;
- b. the date of the promotion;
- c. the reason(s) for the promotion;
- d. the names, last known addresses, last known telephone numbers, and job titles, of all persons involved in the decision-making process and the nature and extent of their involvement in the decision;
- e. the criteria used in making the decision; and
- f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

16. State whether the Plaintiff was/were ever demoted while employed by any Defendant(s). For each demotion, state the following:

- a. from what position or job title the demotion was from and to what position or job title the demotion was to;
- b. the date of the demotion;
- c. the reason(s) for the demotion;
- d. the names, last known addresses, last known telephone numbers, and job titles, of all persons involved in the decision-making process and the nature and extent of their involvement in the decision;
- e. the criteria used in making the decision; and
- f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

17. List chronologically each job title held by Defendant(s) while employed by any Defendant(s), indicating the time period during which each position was held.

18. For any position held by Defendant(s) while employed by any Defendant(s) which there is no job description, describe with specificity the job functions of each such position to the best of Defendant(s)' knowledge.

19. State the required qualifications and skills for each and every job title that Defendant(s) held while employed by any Defendant(s).

20. State whether Defendant(s) was/were ever promoted while employed by any Defendant(s). For each promotion, state the following:

- a. from what position or job title the promotion was from and to what position or job title the promotion was to;
- b. the date of the promotion;
- c. the reason(s) for the promotion;
- d. the names, last known addresses, last known telephone numbers, and job titles, of all persons involved in the decision-making process and the nature and extent of their involvement in the decision;
- e. the criteria used in making the decision; and
- f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

21. State whether Defendant(s) were ever demoted while employed by any Defendant(s). For each demotion, state the following:

- a. from what position or job title the demotion was from and to what position or job title the demotion was to;
- b. the date of the demotion;
- c. the reason(s) for the demotion;
- d. the names, last known addresses, last known telephone numbers, and job titles, of all persons involved in the decision-making process and the nature and extent of their involvement in the decision;
- e. the criteria used in making the decision; and
- f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

22. State the full name of each manager that worked with or oversaw the Plaintiff.

23. Identify and provide full details concerning any Investigation relating to the allegations and claims in the Complaint, including but not limited to who was questioned or interviewed, what was discovered, and what corrective action was taken. Identify those who Defendant(s) contacted or assigned to conduct each specific investigation or inquiry, who was questioned, what was discovered, and what corrective action was taken to the best of Defendant(s)' knowledge. Provide copies of any examinations, audits, findings, reports, or notices in Individual Defendant(s)' possession.

24. Identify and provide full details concerning any Investigation relating to any denials or defenses asserted in the Answer, including, but not limited to who was questioned or interviewed, what was discovered, and what corrective action was taken.

25. Identify all persons employed by Defendant(s) who are responsible for Human Resources, personnel matter, training, orientation, and personnel monitoring for the previous five (5) years to the best of Defendant(s)' knowledge.

26. State whether any Defendant(s) received or went through an orientation program when he/she was hired to work at Defendant(s) and describe said program. If so:

- a. provide a description of the system(s) or procedure(s) used for orientation for the past five (5) years; and
- b. identify and produce all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

27. Identify and provide full details concerning all harassment and discrimination prevention training conducted by Defendant(s) in the past five (5) years.

28. In connection with Defendant(s)' response to the preceding Interrogatory, provide full details of such training including the dates, and provide any written materials used in such training. If the training was provided by a third party, please forward the third party's name, business address, and last known phone number, together with the third party's qualifications to perform such training.

29. State whether any civil or criminal actions have ever been filed charging Defendant(s) with harassment, discrimination and/or retaliation in the past ten (10) years. This includes, but is not limited to all judicial, administration, and/or arbitration hearings. If so, provide the following for each such action:

- a. the name, last known address, last known telephone number, and job title of the complainant(s);
- b. the title of the action;
- c. the name and address of the court where the action was filed;
- d. the docket number of the action;
- e. the date on which the action was filed;
- f. the nature and substance of the action;
- g. the disposition or present status of the action;
- h. whether the case was tried and, if so, the verdict;
- i. the amount of punitive damages, if any;
- j. the amount of compensatory damages, if any; and
- k. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

30. Please describe in detail complaints or Grievances (formal or otherwise) made by the Plaintiff with regard to discrimination, harassment, hostile workplace environment, and/or unfair favoritism regarding fellow employees and/or Defendant(s).

31. Describe, in detail, all complaints or Grievances (formal or otherwise) by any employees of Defendant(s) relating to discrimination, harassment, hostile workplace environment and/or unfair favoritism by Defendant(s) in the past ten (10) years.

32. Describe, in detail, the investigation, determination and/or disciplinary actions taken by Defendant(s) relating to all complaints or Grievances of discrimination, harassment, hostile workplace environment and/or unfair favoritism by Defendant(s) in the past ten (10) years.

33. Describe, in detail, the facts and circumstances relating to the method and process by which complaints or Grievances are handled and resolved with the Human Resources Departments (or similar departments) at Defendant(s).

34. Describe in detail the factual basis for each of Defendant(s) denials of the allegations of the Complaint.

35. Are there any documents that Defendant(s) know or believe to be in existence, although not in Defendant(s)' possession or control, that in any way relate to the subject matter of this litigation? If so, identify each such document, set forth the source of Defendant(s)' information or belief regarding the existence of such document, and identify the person or entity in whose possession or control such document is known or believed to be.

36. Have any admissions been made by party or parties propounding these Interrogatories, or any of his/her/its/their agents, servants or representatives concerning the subject

matter of this litigation? If the answer to this Interrogatory is in the affirmative, set forth in detail the following:

- a. the time, date and place of each admission;
- b. the content and substance of each admission;
- c. the name and address of each person making an admission;
- d. if the admission was an oral communication, the names and addresses of all persons present when the admission was made;
- e. if the admission was made in a document, attach a copy thereof to Defendant(s)' answers to these Interrogatories;
- f. if the admission was made in an oral communication, describe verbatim, to the extent possible, what was said by each party to such oral communication.

37. Set forth whether Defendant(s) have obtained a statement from the party or parties propounding these Interrogatories. If the affirmative, state:

- a. if written, attach a true copy of the statement;
- b. if oral, set forth a verbatim recitation of the statement and advise whether the statement was recorded, the manner of recording and the person who has custody of the statement; and
- c. the date the statement was obtained.

38. Set forth whether Defendant(s) have obtained a statement from any person not a party to this action. If your answer is in the affirmative, state:

- a. Name and address of the person who gave the statement, and date statement obtained;
- b. if written, whether signed by the person;
- c. if oral, name and address of the person who obtained the statement, and if recorded, the nature and present custody of recording;
- d. attach a copy of all said written statements; and
- e. if oral, set forth completely the substance of said statements.

39. Please set forth the existence and contents of any insurance agreement pertaining to the issues in the case, insuring the party answering this Interrogatory. This request is made pursuant to *Rule 4:10-2(b)*.

40. State the policy limits of any insurance policies naming Defendant(s) as an insured which cover the claims in this litigation, along with the name of the insurance carrier and policy number, the amount of any applicable deductible, and if the claim is being defended under a Reservation of Rights Agreement or letter, attach a copy of said Reservation of Rights Agreement or letter.

41. If the party or parties answering these Interrogatories believes that some person, not a party to this action, is in some way responsible for the injuries and/or damages alleged, please set forth the name and address of such person, and the acts or omissions and address of such person, the acts or omissions of said person which caused the injury or damage and the facts which support the belief.

42. If the person certifying the answers to these Interrogatories did not answer each and every question, then identify each person supplying information used to answer the above Interrogatories and set forth the numbers of the Interrogatories as to which each such person supplied information.

43. State whether Defendant(s)' agents communicated with any persons or entities that are not parties to this litigation in connection with the subject matter of this lawsuit. For all such communications that were oral, specify the nature and substance of the communication, the date on which it occurred, the place at which it occurred, and the names, last known addresses, and last known telephone numbers of all persons present. For all such communications that were written, provide true and accurate copies of each such communication.

44. State whether at any time, Defendant(s) ever taped and/or digitally recorded any communication with the Plaintiff, whether face-to-face or telephonic. If so, describe in detail, including but not limited to:

- a. the identity of each Defendant(s) recorded;
- b. the date, time, place, and manner in which you recorded the communications;
- c. the substance of the recorded communications;
- d. the device used for making such recordings; and
- e. whether you obtained consent to tape or record such communications. Provide any such recordings.

45. Set forth in detail, to your knowledge, all notices and warnings received by the Defendant(s) over the past five (5) years from any State and/or Federal and/or Local regulatory authorities who oversee, license, regulate, or discipline your operations, and/or your employees.

46. Describe, in detail, any complaints to, investigations by, and/or inquiries by the New Jersey Department of Labor with regard to any employment matter concerning Defendant(s) for the past five (5) years. Identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

47. Describe in detail Defendant(s)' ability to restore archived electronic data relating to the Plaintiff in this matter's employment contained on electronic media such that upon restoration it may be accessed, viewed, exported, or printed.

48. Describe in detail Defendant(s)' ability to restore archived electronic data relating to the employment of Defendant(s) contained on electronic media such that upon restoration it may be accessed, viewed, exported, or printed.

49. Identify each Individual with knowledge of:
 - a. The type and location of all hardware used as terminals for email, including servers, personal computers, laptops, PDAs, etc. at Corporate Defendant(s) between January 1, 2009 and the present;
 - b. Computer software operating systems and end user-applications servicing Corporate Defendant(s) between January 1, 2009 and the present;
 - c. All email software and versions which have been used on hardware servicing Corporate Defendant(s) between January 1, 2009 and the present;
 - d. The email file naming conventions and standards;
 - e. The back-up and rotation schedules for all email generated or received by Corporate Defendant(s)' employees between January 1, 2009 and the present;
 - f. Electronic data retention, preservation and destruction policies;
 - g. Diskette, CD, DVD and other removable media labeling standards;
 - h. Structure and organization of all information and technology departments and/or information technology support vendors involved with the computer systems at Corporate Defendant(s);
 - i. The location of the email produced in response to the Plaintiff in this matter's First Request for Production;
 - j. The method of search for the documents and electronic data requested in the Plaintiff in this matter's First Request for Production; and
 - k. The date and time of destruction of any electronic data requested in the Plaintiff in this matter's First Request for Production.

50. Identify each email account each Defendant(s) utilized as an employee of Defendant(s) in the last three years.

51. Identify and describe in full detail Defendant(s)' policy relating to an employee's complaint of discrimination and/or retaliation.

52. Describe, in detail, any investigation, determination and/or disciplinary actions taken by Defendant(s) relating to any of the parties in this action in the past ten (10) years.

53. Identify and describe the facts and details of each instance concerning any of the Defendant(s) receiving any sensitivity training or any training regarding appropriate workplace language and conduct.

54. Identify and describe the facts and details relating to each instance in which any of the Defendant(s) reprimanded or disciplined Plaintiff while employed at Defendant(s).

55. Identify and describe the facts and details relating to each instance in which any of the Defendant(s) were reprimanded or disciplined.

56. Identify and describe in detail Defendant(s)' procedure and/or policy for reprimanding, suspending, and terminating employees.

57. Describe, in detail, the factual basis for each Affirmative Defense set forth in the Answer.

58. Describe, in full detail, the facts and circumstances relating to any change in Plaintiff's position and/or job responsibilities.

59. Describe, in full detail, the facts and circumstances relating to any change in Defendant(s) position and/or job responsibilities.

INTERROGATORIES TO INDIVIDUAL DEFENDANT(S) ONLY

1. Identify every paper, writing, memorandum or document of every kind and description of which Individual Defendant(s) has knowledge which is, in any way, intended to support any claim, defense, affirmative defense, or factual allegation, or to be used by Individual Defendant(s) in any manner in this matter, including but not limited to, during the examination of any witness; describe the document as to content and other characteristics, and state the present location of such documents, or in lieu thereof, attach true copies to Individual Defendant(s)'s answers to these Interrogatories. Annex hereto a copy of each said document. For each such document or tangible thing upon which Individual Defendant(s) will rely in support of Individual Defendant(s)'s claims/defenses/affirmative defenses state:

- a. its description;
- b. its nature;
- c. the name and address of person who has custody;
- d. its location; and
- e. its condition.

2. Identify all email addresses used by Individual Defendant(s) the past five (5) years to send and receive emails and identify the internet service provider affiliated with those email addresses.

3. Identify all cell phone numbers used by Defendant(s) for the past five (5) years as well as carrier and current location of each cell phone. For any such cell phones that are no longer in Individual Defendant(s)' possession, please identify the name and address of the person's whose possession they are in.

4. Has Individual Defendant(s) ever been convicted of a criminal offense? If so, for each of Individual Defendant(s)'s convictions, identify and set forth in detail:

- a. the particular offense(s) or crime(s) of which Individual Defendant(s) has been convicted;
- b. the date of each such conviction;
- c. the courts in which Individual Defendant(s) was convicted;
- d. the facts surrounding and underlying each such conviction; and
- e. the punishment or sentence received.

DOCUMENT REQUESTS RELATED TO PUNITIVE DAMAGES

1. All financial statements prepared for the years 2011 through 2021 up to and including the present, setting forth income, expenses, assets, liabilities, and profits of the Corporate Defendant(s).

2. All tax returns filed by the Corporate Defendant(s) for the years 2011 through 2021, up to and including the present.

3. All documents evidencing assets of the Corporate Defendant(s).

4. All documents evidencing the Corporate Defendant(s)' interest in any real estate.
5. All documents evidencing the financial obligations of the Corporate Defendant(s) and all payments on those obligations.
6. All documents evidencing judgments against the Corporate Defendant(s) and the amount of those judgments for the years 2011 through 2021, up to and including the present.
7. All documents evidencing bank accounts held by the Corporate Defendant(s), the location of those accounts, account numbers, and balances of those accounts.
8. All documents evidencing or setting forth accounts receivable and/or obligation owed by others to the Corporate Defendant(s) for the years 2011 through 2021, up to and including the present.
9. All documents evidencing payments made by the Corporate Defendant(s) to creditors.
10. All corporate books or any other written memorandum setting forth income received by the Corporate Defendant(s).
11. All copies of inventories taken by the Corporate Defendant(s) of its property at any time during the years 2011 through 2021, up to and including the present.

INTERROGATORIES RELATED TO PUNITIVE DAMAGES FOR DEFENDANT(S)

1. If the Defendant(s) is a corporation, set forth as to each:
 - a. The full name of the corporation;
 - b. Date of incorporation;
 - c. State of incorporation;
 - d. All States in which the Defendant(s) conducts its business;
 - e. All States in which the Defendants has registered to do business;
 - f. The full and correct names and residential address of all stockholders for the last two (2) years;

- g. The number of shares issued to each of the said stockholders and directors of the corporation during the past two (2) years to include specific dates during which said individuals served as directors;
- h. Number of shares issued to each of said stockholders;
- i. The full and correct names and addresses of all officers of the corporation during the past two (2) years to include the specific dates during which said individuals served as officers;
- j. All trade or fictitious names under which the corporation has conducted its business in the past two (2) years;
- k. The complete street address of all locations where the Defendant(s) has conducted its business in the past two (2) years and include the specific dates during which it was at each location;
- l. The name and address of the person who has custody of this corporation's books and records.

2. Is a majority interest in the corporate stock of the Defendant(s) owned by any individual, corporation or holding company?

3. If your answer to the preceding interrogatory is in the affirmative, please state for the individual, corporation or holding company with a majority interest in the Defendant(s):

- a. Name and address;
- b. State of incorporation;
- c. The state in which doing business;
- d. Address of each business office;
- e. The name and address of each current officer or director;
- f. The nature of the business in which engaged.

4. For each facility owned or maintained by the Defendant(s), please state:

- a. The business address;
- b. The names and addresses of all current officers of the facility;
- c. The nature of the business conducted at the facility;
- d. The dates during which the facility has been owned or maintained by the Defendants' employer;
- e. The number of individuals presently employed at the facility.

5. Set forth in detail the name, address, and telephone number of all businesses in which the principals of the Defendant(s) now has an interest and set forth the nature of the interest.

6. For all bank accounts of the Defendant(s), list the name of the bank, the bank's address, the account number, and the name in which the account is held.

7. Specifically state the present location of all books and records of the Defendant(s), including checkbooks.

8. State the name and address of the persons or entities that prepare, maintain, and/or control the business records and checkbooks of the Defendant(s).

9. List all the physical assets of the Defendant(s) and their location. If any asset is subject to a lien, then state the name and address of the lienholder and the amount due.

10. Does the Defendant(s) own any real estate?

11. If the answer for the preceding interrogatory is in the affirmative, please state for each property:

- a. Name(s) in which property is owned;
- b. Address of property;
- c. Date property was purchased;
- d. Purchase price;
- e. Name and address of mortgage holder, if any;
- f. Balance due on mortgage, if any;
- g. The names and addresses of all tenants and monthly rentals paid by each tenant.

12. List all motor vehicles owned by the Defendant(s) and state the following for each vehicle:

- a. Make, model, and year;
- b. License plate number;
- c. Vehicle identification number;
- d. If there is a lien on the vehicle, the name and address of the lienholder and the amount due on the lien.

13. List all accounts receivable due to the Defendant(s), stating the name, address, and amount due on each receivable.

14. For any transfer of business assets that has occurred within six months from the date of these Interrogatories, specifically identify:

- a. The nature of the asset;
- b. The date of the transfer;
- c. Name and address of the person or entity to whom the asset was transferred; The consideration paid for the asset and the form in which it was paid (check, cash, etc.);
- d. Explain in detail what happened to the consideration paid for the asset.

15. Set forth all judgments that have been entered against the Defendant(s) and include the following for each:

- a. Creditor's name;
- b. Creditor's attorney;
- c. Amount due;
- d. Name of Court;
- e. Docket number.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano

PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

CERTIFICATION

I hereby certify that I have reviewed the document production request and that I have made or caused to be made a good faith search for documents responsive to the request. I further certify that as of this date, to the best of my knowledge and information, the production is complete and accurate based on () my personal knowledge and/or () information provided by others. I acknowledge my continuing obligation to make a good faith effort to identify additional documents that are responsive to the request and to promptly serve a supplemental written response and production of such documents, as appropriate, as I become aware of them. The following is a list of the identity and source of knowledge of those who provided information to me:

- 1.
- 2.
- 3.
- 4.
- 5.

Dated: _____, 2023

By: _____

CERTIFICATION

I hereby certify that the copies of the reports annexed hereto rendered by proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said experts, whether written or oral, are unknown to me and, if such become later known or available, I shall serve them promptly on the propounding party.

I certify that the foregoing answers to the Interrogatories 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.

Dated: _____, 2023 By: _____

NOTICE OF R. 4:14-2(c) VIDEO DEPOSITION OF CORPORATE DEFENDANT(S)

PLEASE TAKE NOTICE that pursuant to *Rule* 4:14-2(c) of the New Jersey Rules of Court, Plaintiff Alyssa Sanchez through his/her undersigned counsel, will take the deposition upon oral examination of the corporate representative of Defendants Verano NJ LLC **commencing on June 5, 2023 at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C. Corporate Defendant(s) is required to designate and produce for deposition a person or persons to testify on its behalf.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff through her undersigned counsel, will take the deposition upon oral examination of Defendant Wharton commencing on **June 6, 2023 at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff through her undersigned counsel, will take the deposition upon oral examination of Defendant Merced commencing on **June 7, 2023 at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff through her undersigned counsel, will take the deposition upon oral examination of Defendant Bynum commencing on **June 8, 2023 at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff through her undersigned counsel, will take the deposition upon oral examination of Defendant Torres commencing on **June 9, 2023 at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

NOTICE OF R. 4:14-2(c) VIDEO DEPOSITION OF CORPORATE DEFENDANT(S)

PLEASE TAKE NOTICE that pursuant to *Rule* 4:14-2(c) of the New Jersey Rules of Court, Plaintiff Alyssa Sanchez through his/her undersigned counsel, will take the deposition upon oral examination of the corporate representative of Defendants VZL Staffing Services LLC **commencing on June 12, 2023 at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C. Corporate Defendant(s) is required to designate and produce for deposition a person or persons to testify on its behalf.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Alyssa Sanchez

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: February 9, 2023

Civil Case Information Statement

Case Details: SOMERSET | Civil Part Docket# L-000164-23

Case Caption: SANCHEZ ALYSSA VS VERANO NJ LLC

Case Initiation Date: 02/09/2023

Attorney Name: PETER DOUGLAS VALENZANO

Firm Name: MCOMBER MCOMBER & LUBER, PC

Address: 54 SHREWSBURY AVE

RED BANK NJ 07701

Phone: 7328426500

Name of Party: PLAINTIFF : Sanchez, Alyssa

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Alyssa Sanchez? NO

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? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

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? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

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)

02/09/2023

Dated

/s/ PETER DOUGLAS VALENZANO

Signed

