

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 519-3728
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 10, 2017
RE: S M VS BOARD OF EDUCATION OF THE TOWNSHIP OF MONRO
DOCKET: MID L -002756 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON PHILLIP L. PALEY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (732) 519-3737 EXT 3737.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.

PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: RICHARD A. MC OMBER
MC OMBER & MC OMBER PC
54 SHREWSBURY AVENUE
RED BANK NJ 07701

JUMGAR2

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CIVIL RECORDS
 N.J. SUPERIOR COURT
 MIDDLESEX VICINAGE
 2017 MAY -4 P 2:19
 FILED & RECEIVED #4

S.M. o/b/o H.M.,

Plaintiffs

v.

BOARD OF EDUCATION OF THE
 TOWNSHIP OF MONROE IN THE
 COUNTY OF MIDDLESEX, J.H., S.H.,
 A. H., ROBERT GOODALL, ANTHONY
 GAMBINO, and DANIEL LEE,

Defendants

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION
 MIDDLESEX COUNTY

DOCKET NO.: *L2756-17*

Civil Action

**COMPLAINT AND
 DEMAND FOR JURY TRIAL**

S.M. as the parent and natural guardian of minor H.M., (“Plaintiffs”), by way of Complaint against Defendants states as follows:

INTRODUCTION

1. School is a place for students to not only learn the academic curriculum, but should serve as an environment for children to cultivate confidence and engage in meaningful social interaction. It is incumbent upon teachers, administrators and parents to facilitate a positive and inclusive social setting. In this case however, the school’s administration and

teachers completely abdicated those responsibilities, fostering an environment in which one student could viciously persecute and humiliate another on the basis of sexual orientation, resulting in permanent physical and emotional injuries. Fortunately, New Jersey law provides redress for students subjected to discrimination in the academic environment. Plaintiffs thus bring the instant lawsuit.

PARTIES

2. Defendant Board of Education of the Township of Monroe in the County of Middlesex (“MTBOE”) is a body politic of the State of New Jersey, operates the Monroe Township School District in the County of Middlesex and the State of New Jersey (the “District”) having its principal office located at 423 Buckelew Avenue, Monroe Township, New Jersey 08831.

3. S.M. is the parent and natural guardian of H.M. S.M. and H.M. are domiciliaries of the State of New Jersey. H.M. is currently a sixteen (16) year old male, and at all times relevant hereto, was a student at Monroe Township High School in the County of Middlesex and State of New Jersey (“MTHS”). MTHS is operated by the District.

4. Defendant J.H. (“J.H”) is a minor residing in the State of New Jersey. At all times relevant hereto, J.H. was a male student at MTHS.

5. Defendants S.H. and A.H. are the parents and natural guardians of J.H. and are domiciliaries of the State of New Jersey.

6. Defendant Robert Goodall (“Defendant Goodall”) is the principal of MTHS, operated by the District. Defendant Goodall was employed by the District at the time the events described herein took place and resides in the State of New Jersey. This claim is brought against Defendant Goodall in his individual capacity and as an agent of the District during the course of

his employment.

7. Defendant Anthony Gambino (“Defendant Gambino”) is a guidance counselor at MTHS. Defendant Gambino was employed by the District at the time the events described herein took place and resides in the State of New Jersey. This claim is brought against Defendant Gambino in his individual capacity and as an agent of the District during the course of his employment.

8. Defendant Daniel Lee (“Defendant Lee”) is a teaching staff member at MTHS. Defendant Lee was employed by the District at the time the events described herein took place and resides in the State of New Jersey. This claim is brought against Defendant Lee in his individual capacity and as an agent of the District during the course of his employment.

FACTS COMMON TO ALL CLAIMS

9. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

10. This action arises from the outrageous and abusive conduct toward H.M. on account of his perceived sexual orientation and from the District’s conduct in purposely failing to take preventative or remedial action to prevent further damage to H.M.

11. H.M. is a sixteen (16) year old junior at MTHS, a Boy Scout, and actively involved in his church, among other community organizations.

12. Starting in middle school, and throughout his time at MTHS, H.M. has been the victim of pervasive and severe harassment based upon his gender and/or perceived sexual orientation in violation of New Jersey’s Law Against Discrimination, *N.J.S.A. 10:5-1, et seq.*

13. The District permitted students to engage in homophobic and harassing conduct toward H.M.

14. H.M.'s classmate, J.H., especially targeted H.M. At the hands of J.H., H.M. was subjected to daily torture and ridicule on account of his perceived sexual orientation and/or gender.

15. The campaign of hostility toward H.M. created a culture of discrimination and caused H.M. humiliation on a daily basis.

16. By way of example, H.M. is a member of the MTHS Gay Straight Alliance ("GSA"), a student organization that provides a safe place for students to discuss issues related to sexual orientation, gender identity and expression. J.H. repeatedly called H.M. "gay" and a "fa**ot" because of his affiliation with the GSA.

17. H.M. was regularly questioned and harassed about his sexual orientation and/or perceived sexual orientation by J.H. in the presence of MTHS teachers, which included being subjected to homophobic comments and slurs.

18. Over the years, S.M. and H.M. have complained to MTHS officials about the pervasive and severe harassment H.M. endured, only to hear MTHS officials echoing sentiments like "boys will be boys" in response.

19. Distressed about MTHS's dismissive attitude, S.M. scheduled an appointment with H.M.'s guidance counselor, Defendant Gambino, before the 2015-2016 school year (the "Sophomore School Year") to discuss J.H.'s harassment of H.M.

20. Upon information and belief, the district failed to conduct any investigation into the harassment H.M. was suffering ("HIB Investigation") or separate J.H. and H.M. for the Sophomore School Year, so J.H.'s predatory behavior toward H.M. went unaddressed and continued to escalate.

21. For instance, J.H. and H.M. were enrolled in the same Driver Education course

during the Sophomore School Year (the “Driver Education Class”).

22. During the Driver Education Class, taught by MTHS Physical Education teacher Defendant Lee, J.H. berated H.M. with homosexual slurs without any intervention by Defendant Lee.

23. J.H. continually demeaned H.M. in the Driver Education Class by intentionally harassing H.M. Such conduct included, but was not limited to, repeatedly calling H.M. “gay” and “fa**ot” while bumping into H.M., bumping H.M.’s chair and knocking H.M.’s books off of his desk.

24. Such conduct constitutes a hostile classroom environment, and J.H.’s daily abusive, derogatory and discriminatory treatment of H.M. continued without any MTHS official addressing J.H.’s behavior in any way.

25. H.M. asked Defendant Lee to please address J.H.’s harassment, which was so severe and pervasive that it completely prevented H.M. from learning.

26. Defendant Lee permitted H.M. to change seats, but both H.M. and J.H. remained in the same Driver Education Class without any further discussion of J.H.’s conduct.

27. Upon information and belief, Defendant Lee did nothing to stop or prevent J.H.’s outrageous and demeaning behavior toward H.M. and sat idly by as the discriminatory treatment continued.

28. Again, even though MTHS officials had knowledge that J.H. was targeting H.M. and it was creating a hostile classroom environment for H.M., J.H.’s conduct was ignored, so it continued, and J.H. only became more aggressive and hostile toward H.M.

29. Ultimately, the District took no action to help S.M. and H.M., did not investigate or discipline J.H. and turned a blind eye to J.H.’s daily torture of H.M.

30. Essentially, the District, Defendants Goodall, Gambino, and Lee all “threw [H.M.] to the wolves,” and effectively encouraged the hostile classroom environment.

31. Despite Defendants’ active awareness of J.H.’s hostility toward H.M., later in the Sophomore School Year, J.H. and H.M. were enrolled in the same Physical Education class, also taught by Defendant Lee.

32. On November 25, 2015, J.H.’s aggression toward H.M. finally boiled over when his abusive words became physical actions, and H.M.’s life would forever be changed.

The Locker Room Incident

33. H.M. and J.H. were in the MTHS locker room during Physical Education class wherein H.M. was talking to another student who is openly gay.

34. J.H. began his usual berating of the boys, calling them “gay,” saying they were “so gay for each other” and calling them “fa**ots.”

35. H.M. attempted to diffuse the tension and appease J.H. by making light of the situation.

36. J.H. began to scream threats at H.M., cocked back his fist and punched H.M. hard in the face several times, while standing over H.M.

37. Students intervened and pulled J.H. off of H.M., but J.H. broke free and a second time delivered repeated blows onto H.M. until H.M. finally fell to the ground, hit his head on the gym lockers, and remained on the ground, unconscious (“the Locker Room Incident”).

38. The assault and battery is preserved in a video recording taken by another student, which was distributed throughout the MTHS student body (the “Recording”).

39. Inexplicably, the Locker Room Incident took place without a single MTHS teacher ever intervening, despite the apparent screaming and cheering that continued throughout.

40. According to eye witness testimony provided to the police after the Locker Room Incident, H.M. was still unconscious on the floor of the locker room when a teacher finally entered the MTHS locker room to find him.

41. H.M. was hospitalized for five (5) days as a result of the injuries he sustained from the Locker Room Incident.

42. As a result of the Locker Room Incident, H.M. suffered from and continues to suffer from a multitude of physical injuries.

43. Immediately following the Locker Room Incident, H.M. underwent emergency surgery wherein a titanium plate was inserted into H.M.'s face to replace the orbital floor under H.M.'s eye.

44. Upon information and belief, the titanium plate in H.M.'s face has an approximate twenty (20) year life span, so H.M. will be required to undergo surgeries to replace the plate in the future.

45. Further, H.M. suffers from permanent swelling on the right side of his face surrounding his eye. This swelling prevents H.M. from fully opening his eye so he appears to be slightly squinting at all times. H.M.'s smile is also impacted by this swelling.

46. H.M. also experiences great pain in connection with the swelling in his face, which is exacerbated by barometric pressure and allergies, as the swelling pushes on H.M.'s sinuses.

47. H.M. also suffers from intense pressure in his eye which fluctuates and causes him pain and discomfort.

48. Additionally, H.M.'s eyelid continues to appear discolored and bruised, an effect which could be permanent.

49. H.M. also suffers from an impairment to the range of vision in his affected eye.

50. Such injuries resulting from the Locker Room Incident continue to impact H.M.'s daily life as he is now unable to participate in contact sports of any kind and has discontinued other physical activities to avoid further pain, discomfort and injury.

51. Unbelievably, the District suspended H.M. from school for five (5) days for "cursing" during the Locker Room Incident and because, according to the District, H.M. "incited" J.H.'s assault and battery upon himself.

52. Upon information and belief, J.H. was adjudicated as a delinquent for Aggravated Assault against H.M.

53. The Court also issued a "no contact" order between J.H. and H.M. (the "No Contact Order").

54. After J.H. beat H.M. unconscious in the MTHS locker room, the District finally conducted a HIB Investigation.

55. J.H. did not return to MTHS for the remainder of the Sophomore School Year.

56. Indeed, Defendant Goodall advised Plaintiffs that H.M. would not see J.H. "for the foreseeable future."

57. However, J.H. returned to MTHS for the 2016-2017 school year (the "Junior School Year") and walked the halls in close proximity to H.M., which upon information and belief, was in violation of the existing No Contact Order and J.H.'s adjudication as a delinquent for Aggravated Assault.

58. H.M. suffers from permanent physical injuries and ongoing emotional injuries as a result of the Locker Room Incident and the District's permitting J.H.'s return to MTHS, as he poses a constant threat to H.M.'s physical and emotional wellbeing.

59. Worse, because the Recording was disseminated throughout the MTHS student body, H.M. has been forced to relive the assault and battery over and over again, adding to his emotional injuries.

60. Despite repeated warning signs, the District failed to take corrective action regarding J.H.'s pervasive and severe treatment of H.M.

61. For example, the District failed to conduct a HIB Investigation until it was too late.

62. The District ignored S.M.'s and H.M.'s pleas for help, and J.H. inflicted permanent physical and emotional injuries upon H.M.

63. Worse, H.M.'s injuries are ongoing and were even exacerbated by J.H.'s return to MTHS, as H.M. was required to be in close unsupervised quarters of the MTHS hallways with J.H. on a daily basis.

64. As a result of the above-described course of events, H.M. suffers from depression and post-traumatic stress disorder ("PTSD").

65. J.H.'s actions toward H.M. are willful and directly related to H.M.'s perceived sexual orientation.

66. The District acted willfully in not following through with proper consequences for J.H.'s actions and allowing him to continue to be a source of fear and intimidation for H.M. at MTHS.

67. School employees have a duty to provide a safe and nurturing environment for students.

68. H.M. was harmed physically, mentally, and emotionally on school grounds after MTHS officials were warned of J.H.'s abusive treatment of H.M.

69. By failing to take timely and appropriate action regarding the alleged harassment, the District and its employees have breached and continue to breach their duty to protect H.M.

COUNT ONE

**NJLAD: HOSTILE CLASSROOM ENVIRONMENT
DUE TO GENDER AND/OR PERCEIVED SEXUAL ORIENTATION**

70. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

71. H.M. was subjected to repeated, pervasive, severe and continuing instances of harassment on account of his gender and/or perceived sexual orientation on an almost daily basis.

72. The conduct would not have occurred but for H.M.'s gender and/or perceived sexual orientation.

73. The conduct was severe and pervasive enough to make a reasonable person believe that the conditions of education were altered and the classroom environment was hostile.

74. As the supervisors of the educational environment, the District is vicariously, strictly and/or directly liable to Plaintiff pursuant to the New Jersey Law Against Discrimination ("LAD"), *N.J.S.A. 10:5-1, et seq.*, in that the affirmative acts of harassment committed by J.H. occurred within the scope of the educational environment; the creation of the hostile classroom environment was aided by the District in delegating power to its agents and/or employees to supervise H.M. and J.H. and to control the day-to-day classroom environment; and/or the District is deliberately indifferent, reckless, negligent and/or tacitly approved the hostile classroom environment; and/or 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 discrimination and harassment in

the classroom; and/or by having actual knowledge of the harassment of H.M. and failing to promptly and effectively act to stop it.

75. Defendants, as supervisors of H.M. and/or J.H. aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce J.H. to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing acts toward H.M. in violation of their supervisory duty to halt or prevent harassment, subjecting Defendants to individual liability to Plaintiffs pursuant to *N.J.S.A. 10:5-12(e)*.

76. As a direct result of Plaintiffs raising complaints to the District and its agents and/or employees, Defendants took retaliatory action against H.M. by subjecting him to a hostile classroom environment.

77. Defendants are vicariously, strictly, and/or directly liable to Plaintiffs for an unlawful discriminatory classroom environment in violation of the LAD pursuant to *N.J.S.A. 10:5-12(d)*.

78. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiffs have sustained damages.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the LAD, punitive damages, pre-and post-judgment interest, attorney's fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT TWO

NJLAD: RETALIATION

79. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

80. Throughout the course of H.M.'s education, Plaintiffs complained, threatened to complain, and/or protested against the continuing course of harassment and discrimination on the basis of his gender and/or sexual orientation giving rise to the hostile classroom environment set forth at length above. Defendants had knowledge of the Plaintiffs' complaints and/or protests.

81. As a direct result of Plaintiffs raising complaints, Defendants took retaliatory action against H.M. Defendants are vicariously, strictly, and/or directly liable to Plaintiffs for unlawful retaliation in violation of the LAD.

82. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiffs have sustained damages.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the LAD, punitive damages, pre- and post-judgment interest, attorney's fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT THREE

ASSAULT

83. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

84. By intentionally touching H.M., J.H. intended to cause and did cause H.M. to suffer apprehension of an immediate harmful contact.

85. J.H. touched H.M. knowingly, willfully, and with malicious intent, and Plaintiffs are entitled to punitive damages.

86. J.H. was a student and minor under the care of Defendants when J.H. committed the acts intended to cause and causing H.M. to suffer apprehension of an immediate harmful contact.

87. Defendants, despite having actual or constructive notice of the conduct of J.H., were deliberately indifferent and acquiesced to same, proximately causing damages to H.M.

88. On account of the conduct of Defendants, Plaintiffs have been injured.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants on this Count, together with compensatory and equitable relief, punitive damages, pre-and post-judgment interest, attorney's fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT FOUR

BATTERY

89. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

90. By intentionally touching H.M., J.H. intended to cause and did cause immediate harmful and offensive contact to H.M.

91. J.H. touched H.M. knowingly, willfully, and with malicious intent, and Plaintiffs are entitled to punitive damages.

92. J.H. was a student and minor under the care of Defendants when he committed the intentional touching of H.M.

93. Defendants, despite having actual or constructive notice of the conduct of J.H., were deliberately indifferent and acquiesced to same, proximately causing damages to the Plaintiffs.

94. On account of the conduct of Defendants, Plaintiffs have been injured.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants on this Count, together with compensatory and equitable relief, punitive damages, pre-and post-judgment interest, attorney's fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT FIVE

NEGLIGENCE

95. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

96. The District supervised, cared for, and/or controlled the conduct of students during the school day at MTHS.

97. It then and there became the duty of the District, by and through their agents, servants and employees, to use reasonable care to supervise the conduct of District students under its care.

98. Notwithstanding said duty, the District, by and through its agents, servants, and employees, carelessly, negligently, and recklessly supervised J.H.

99. As a direct and proximate result of the carelessness, negligence, and recklessness of the District as aforesaid, Plaintiffs were damaged; H.M. suffered severe and permanent bodily injuries; he suffered great pain; he suffered mental anguish and great shock to his nervous system; he was forced to seek the services of physicians and hospitals in an effort to effect a cure

to his injuries; Plaintiffs were caused to expend large sums of money for medical care and attention; and in other ways, Plaintiffs suffered numerous other damages and will, in the future, so suffer.

WHEREFORE, Plaintiffs demand judgment against Defendants for damages as a result of the carelessness, negligence, and recklessness of Defendants, together with punitive damages, attorney's fees, interest, costs of suit, and other such relief as the Court may deem just and equitable under all circumstances.

COUNT SIX

NEGLIGENT SUPERVISION

100. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

101. Defendants' negligence, gross negligence, reckless conduct and supervision of J.H. directly and proximately caused H.M. to be ridiculed, harassed, assaulted and battered.

102. Defendants' negligent supervision of J.H. directly and proximately caused H.M. severe emotional damages.

103. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiffs have sustained damages.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the law, punitive damages, pre- and post-judgment interest, attorney's fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT SEVEN

NEGLIGENT TRAINING

104. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

105. The District's negligence, gross negligence, reckless conduct and training of Defendants Goodall, Gambino, and Lee as employees and supervisors directly and proximately caused H.M. to be ridiculed, harassed, assaulted and battered.

106. The District's negligent training of Defendants Goodall, Gambino, and Lee as employees and supervisors directly and proximately caused H.M. severe emotional damages.

107. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiffs have sustained damages.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the law, punitive damages, pre- and post-judgment interest, attorney's fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT EIGHT

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

108. Plaintiffs repeat each and every allegation set forth above as if set forth fully herein at length.

109. Defendants, through the course of conduct set forth above, intentionally or recklessly committed acts or omissions producing emotional distress to H.M.

110. The conduct of Defendants set forth at length above is extreme and outrageous in that it goes beyond all possible bounds of decency and is regarded as atrocious and utterly intolerable in a civilized society.

111. As a proximate result of said conduct, H.M. has suffered emotional distress so severe that no reasonable person could be expected to endure same.

112. On account of the conduct of Defendants, Plaintiffs have been injured.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants on this Count, together with compensatory and equitable relief, punitive damages, pre-and post-judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE


Pursuant to *Rule 4:10:2(b)*, demand is made that Defendants disclose to Plaintiffs' 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 Plaintiffs' 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

Plaintiffs demand a trial by jury on all issues.

McOMBER & McOMBER, P.C.
Attorneys for Plaintiffs,
S.M. o/b/o H.M.

Date: 4/28/17

By: 

R. ARMEN McOMBER

DESIGNATION OF TRIAL COUNSEL

Pursuant to *Rule 4:25-4*, R. ARMEN McOMBER, ESQUIRE is hereby designated as trial counsel for Plaintiffs.

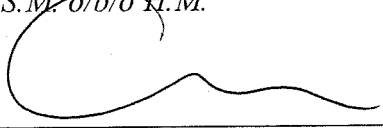
CERTIFICATION

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 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, P.C.
Attorneys for Plaintiffs,
S.M. o/b/o H.M.

Date: 4/28/17

By: 

R. ARMEN McOMBER

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY
	Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed.		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA
			CHG/CK NO.:
			AMOUNT:
			OVERPAYMENT:
		BATCH NUMBER:	
ATTORNEY/PRO SE NAME R. Armen McOmber, Esquire - ID # 018251998		TELEPHONE NO. 732 842-6500	COUNTY OF VENUE Middlesex
FIRM NAME (if applicable) McOmber & McOmber, P.C.		DOCKET NO. (when available) 2756-17	
OFFICE ADDRESS 54 Shrewsbury Avenue Red Bank, NJ 07701		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) S.M. o/b/o H.M.		CAPTION S.M. o/b/o H.M. v. Board of Education of the Township of Monroe in the County of Middlesex, J.H., S.H., A.H., Robert Goodall, Anthony Gambino, and Daniel Lee	
CASE TYPE NO. (See reverse side for listing) 618	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.	
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, LIST DOCKET NUMBERS	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP <input type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input checked="" type="checkbox"/> OTHER (explain) <u>Student</u> <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION:			
FILED & RECEIVED #4 2017 MAY -4 P 2:19 CIVIL RECORDS N.J. SUPERIOR COURT MIDDLESEX VICINAGE			
	DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION:
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE:	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE 