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PAUL OLIVEIRA, Plaintiff, v. BOARD OF EDUCATION OF THE CITY OF LINDEN, IN THE COUNTY OF UNION; MARLENE BERGHAMMER; ATIYA Y. PERKINS; DEREK ARMSTEAD; 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 UNION COUNTY DOCKET NO.: Civil Action **COMPLAINT AND DEMAND FOR JURY TRIAL; FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS**

Plaintiff, Paul Oliveira ("Plaintiff"), by way of Complaint against Defendant Board of Education of the City of Linden, in the County of Union ("Defendant Linden"), Defendants ABC Corporations 1-5 (fictitious names describing presently unknown business entities) (along with "Defendant Linden," collectively referred to as "Corporate Defendants"), Defendant Marlene Berghammer ("Defendant Berghammer"), Defendant Atiya Y. Perkins ("Defendant Perkins"), Defendant Derek Armstead ("Defendant Armstead"), and Defendants John Does 1-5 (fictitious names describing presently unidentified individuals) (along with "Defendant

Berghammer," "Defendant Perkins," and "Defendant Armstead," collectively referred to as the "Individual Defendants") (all collectively "Defendants"), alleges as follows:

INTRODUCTION

This is a compelling and provable case involving (1) blatant acts of retaliation in violation of New Jersey's Law Against Discrimination, N.J.S.A. 10:5-1, et seq. (hereinafter referred to as the "LAD") and (2) whistleblower retaliation in violation of New Jersey's Conscientious Employee Protection Act, N.J.S.A. 34:19-1, et seq. (hereinafter referred to as the "CEPA"). While it would be laudable for Defendants to undertake efforts to recruit staff members of diverse races, nationalities, and/or backgrounds, the facts show that Defendants had a very different agenda in mind; namely, an antisemitic and illegal hiring scheme concocted by Defendant Armstead, the Mayor of Linden, and supported by Defendant Berghammer, Board President of Defendant Linden, and Defendant Perkins, Defendant Linden's Superintendent of Schools, to, literally, keep Linden from being "taken over" by Jews.

The facts plainly and unmistakably demonstrate that Plaintiff, the Assistant Superintendent For Academics for Defendant Linden, was subjected to a concerted campaign of continuing retaliation after objecting to the aforementioned unlawful and unethical practices engaged in by Defendants. Critically, Plaintiff witnessed Defendants Berghammer and Armstead make several explicitly antisemitic and otherwise discriminatory remarks, including, but not limited to, the following:

- Defendant Berghammer: **"If it's in a neighborhood school district, it should be, we don't mind if it is a black person or a Haitian speaking person";**

- Defendant Armstead: **"That is what has to happen in order to keep our community from being taken over by guys with big hats and curls";**

- Defendant Armstead: **"He sold his home anyway and moved out of town, I am not feeling that at all. He sold his house to the guys with the big hats and the curls";**[1]

- Defendant Armstead: **"Linden will go the same way as Roselle, Irvington, Newark if we don't manage this thing the way that we've been trying to manage it, and that's having full and complete control of who gets hired";**

- Defendant Berghammer: **"Do we have demographics as to what type of race they are?";**

- Defendant Armstead: **"You can almost figure that out by the name sometimes";** and

- Defendant Berghammer: **"How many of the teachers that you are hiring are black?"**

Beyond witnessing such discriminatory remarks, Defendants specifically instructed Plaintiff to only consider potential candidates who were African American and/or of Haitian descent. Defendants' illegal directives in that regard were specifically designed to (1) marginalize individuals of one race/nationality (i.e., Jewish individuals) at the expense of other candidates who were not Jewish and (2) allow Defendants to "cherry pick" which specific candidates they want hired in the Linden School District, based on unlawful criteria. Understanding such comments and directives to be discriminatory and unlawful, Plaintiff lodged numerous complaints with Defendants Perkins and Berghammer regarding same. Instead of taking remedial action, however, Defendant Perkins continually ignored Plaintiff's complaints and directed Plaintiff to continue meeting with Defendants Berghammer and Armstead to select their desired candidates, in spite of the clear illegality associated with same. Further, Defendant Perkins also began fabricating criticism of Plaintiff's work performance via emails and formal memoranda, creating a work environment so unbearably hostile that Plaintiff was forced to take

[1] This comment was made in reference to a prospective employee who had moved out of Linden.

protected medical leave to deal with the stress and anxiety associated with same. Adding insult to injury, Defendants further retaliated against Plaintiff in connection with said medical leave by demanding extensive medical documentation that other similarly situated employees were not subjected to.

Despite multiple complaints about Defendants' illegal hiring practices, Defendants simply denied that Plaintiff's complaints have any merit without performing any actual investigation into same. Defendants have still failed to take any meaningful remedial action in response to Plaintiff's complaints and, instead, retaliated against him in a calculated effort to torment Plaintiff into quitting his job. Unable to further tolerate the constant retaliation to which he was subjected by Defendants, Plaintiff confirmed his termination by Defendants via email on April 17, 2024.

Fortunately, New Jersey law provides redress for people subjected to such treatment in the workplace. Accordingly, Plaintiff brings this lawsuit under both the LAD and CEPA, both of which are broad and to be liberally construed, to assert his right, and the rights of others throughout the State, to work in an environment free from abuse and retaliation.

PARTIES

1. Plaintiff is a domiciliary of New Jersey, currently residing in Highlands, New Jersey and at all times relevant hereto is employed by Defendant Linden as the Assistant Superintendent For Academics.

2. Defendant Linden is a body politic of the State of New Jersey which operates the Linden Public School District, located at 2 East Gibbons Street, Linden, NJ 07036. At all times relevant hereto, Defendant Linden is an "employer" as defined under the LAD and CEPA and Plaintiff's employer.

3. Defendant Berghammer, at all times relevant herein, is the Board President of Defendant Linden and a resident of the State of New Jersey. Accordingly, this claim is brought by Plaintiff against Defendant Berghammer in her individual capacity and/or as an agent or servant of Defendant Linden acting during the course of her employment who aided and abetted the retaliation referenced herein. At all times relevant hereto, Defendant Berghammer is an "employer" as defined under the LAD and CEPA.

4. Defendant Perkins, at all times relevant herein, is the Superintendent of Defendant Linden and a resident of the State of New Jersey. Defendant Perkins is Plaintiff's direct supervisor. Accordingly, this claim is brought by Plaintiff against Defendant Perkins in her individual capacity and/or as an agent or servant of Defendant Linden acting during the course of her employment who aided and abetted the retaliation referenced herein. At all times relevant hereto, Defendant Perkins is an "employer" as defined under the LAD and CEPA.

5. Defendant Armstead, at all times relevant herein, is the Mayor of the City of Linden and a resident of the State of New Jersey. Accordingly, this claim is brought by Plaintiff against Defendant Armstead in his individual capacity and/or as an agent or servant of Defendant Linden acting during the course of his employment who aided and abetted the retaliation referenced herein. At all times relevant hereto, Defendant Armstead is an "employer" as defined under the LAD and CEPA.

6. Upon information and belief, Defendants ABC Corporations 1-5 are currently unidentified business entities that acted in concert with Defendant Linden and/or currently unidentified business entities responsible for the creation and/or implementation of anti-retaliation policies of Defendant Linden, and/or currently unidentified business entities that may have liability for the damages suffered by Plaintiff under any theory advanced herein.

7. 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 Defendant Linden and are currently unidentified individuals who may have liability for the damages suffered by Plaintiff under any theory advanced herein.

FACTS COMMON TO ALL CLAIMS

8. Defendant Linden claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey specific policies prohibiting retaliation.

9. Defendant Linden claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey a zero-tolerance policy when it comes to retaliation.

10. Defendant Linden claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures requiring employees who believe he or she was the victim of retaliation to report the behavior to supervisory and management staff.

11. Defendant Linden claims, at all times relevant hereto, that it had in effect at its 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 retaliation brought to their attention by employees.

12. Defendant Linden claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies encouraging employees to disclose to supervisors or managers of the company any conduct engaged in by the company or a co-worker which an employee reasonably believed violated state or federal law.

13. Defendant Linden claims, at all times relevant hereto, that it had in effect at its 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 co-worker which the employee reasonably believes is or was a violation of laws, rules, or regulations.

14. Defendant Linden claims, at all times relevant hereto, that it had in effect at its 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 co-worker which the employee reasonably believes is or was unethical or unsafe.

15. Defendant Linden claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies prohibiting an employee from suffering retaliation for disclosing to supervisors or managers of Corporate Defendants any conduct engaged in by the company or a co-worker which an employee reasonably believes is or was unethical or unsafe.

16. Defendant Linden claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies prohibiting an employee from suffering retaliation for disclosing to supervisors or managers of Corporate Defendants any conduct engaged in by the company or a co-worker which an employee reasonably believes is or was a violation of Corporate Defendants' company policies.

17. Plaintiff has been a loyal and dedicated employee of the New Jersey Public School system for over twenty (20) years.

18. On or about January 11, 2023, Plaintiff commenced employment with Defendant Linden as the Assistant Superintendent For Academics.

19. At all times throughout his employment with Defendant Linden, Plaintiff performed his job responsibilities competently and diligently, loyally dedicated to Defendants and the students and families which they serve.

20. Despite Plaintiff's demonstrated ability to maintain the very highest level of job performance, Plaintiff found himself in the midst of an unlawful, unethical, and discriminatory hiring scheme wherein Defendants proactively sought to hire candidates of a certain race.

21. Indeed, while it would have been admirable for Defendants to try to hire employment candidates of diverse races, nationalities, and/or backgrounds, the facts show that Defendants had a much more nefarious and, illegal, agenda in mind; namely, an illegal hiring practice involving antisemitism where Jewish individuals are deliberately excluded from consideration for employment positions in Defendant Linden.

22. Also as part of Defendants' unlawful hiring scheme, only those candidates specifically sought and/or desired by Defendants were hired, instead of allowing for all candidates to have a fair chance at employment in the Linden School District.

23. Moreover, by directing Plaintiff to hire candidates of Defendant Armstead's choosing, Defendant Linden engaged in the illegal practice of abrogating its responsibility to hire its own employees to Defendant Armstead, the Mayor of Linden. Of course, Defendant Armstead, in his capacity as Mayor, could not and should not have been directing Defendant Linden as to who should be hired for certain positions in the Linden School District.

24. When Plaintiff complained about these unlawful and unethical practices, Defendants commenced a campaign of retaliation against him, causing Plaintiff's previously collegial working environment to become so untenable that he was forced to take a protected

medical leave to deal with same. Eventually, Plaintiff would suffer a constructive termination as a direct result of Defendants' campaign of retaliation.

A. Defendants Berghammer and Armstead Disclose Their Discriminatory and Illegal Hiring Agenda to Plaintiff.

25. In early 2024, Defendants Perkins, Berghammer, and Armstead collectively directed that Plaintiff meet with Defendants Berghammer and Armstead at Defendant Armstead's office to review and discuss who they (i.e., Defendants Berghammer and Armstead) wanted hired by Defendant Linden in its schools.

26. In doing so, Defendant Linden illegally abrogated its responsibility to hire employees for its school system to the Mayor of Linden, Defendant Armstead. Of course, directing Defendant Linden to hire specific individuals went well beyond the scope of Defendant Armstead's authority as Mayor.

27. In or around January 22, 2024, Plaintiff participated in a meeting with Defendants Berghammer and Armstead whereupon they disclosed their explicitly discriminatory plan for hiring new employees of Defendants Berghammer and Armstead's choosing.

28. Specifically, during said January 22, 2024 meeting, Defendants Berghammer and Armstead made multiple antisemitic and otherwise discriminatory remarks, including, but not limited to, the following:

- Defendant Berghammer: **"If it's in a neighborhood school district, it should be, we don't mind if it is a black person or a Haitian speaking person";**

- Defendant Armstead: **"That is what has to happen in order to keep our community from being taken over by guys with big hats and curls";**

- Defendant Armstead: **"He sold his home anyway and moved out of town, I am not feeling that at all. He sold his house to the guys with the big hats and the curls";**[2]

- Defendant Armstead: **"Linden will go the same way as Roselle, Irvington, Newark if we don't manage this thing the way that we've been trying to manage it, and that's having full and complete control of who gets hired";**

- Defendant Berghammer: **"Do we have demographics as to what type of race they are?"**;

- Defendant Armstead: **"You can almost figure that out by the name sometimes";** and

- Defendant Berghammer: **"How many of the teachers that you are hiring are black?"**

29. In addition to witnessing such discriminatory and unlawful comments, Defendants explicitly instructed Plaintiff that Defendants only wanted to hire Linden residents who are African American and/or of Haitian descent.

30. Defendants' illegal directives in that regard were specifically designed to (1) marginalize individuals of one race/nationality (i.e., Jewish individuals) at the expense of other candidates who were not Jewish and (2) allow Defendants to "cherry pick" which specific candidates they wanted hired in the Linden School District, based on unlawful criteria. Understanding Defendants Berghammer and Armstead's directives to be discriminatory and unlawful, Plaintiff subsequently lodged numerous complaints with his supervisor, Defendant Perkins.

[2] This comment was made in reference to a prospective employee who had moved out of Linden.

B. Plaintiff Repeatedly Objects to Defendants' Discriminatory and Illegal Hiring Practices and Faces Blatant Retaliation.

31. Plaintiff objected to Defendants' discriminatory hiring practices to his supervisor, Defendant Perkins, on multiple occasions.

32. By way of example but not limitation, during a meeting in or around January 22, 2024, and in reference to the aforementioned hiring scheme, Plaintiff told Defendant Perkins, "I don't feel comfortable, this is not right with the amount of oversight and directives."

33. In yet another meeting that same day with Defendant Berghammer, Plaintiff explicitly told Defendant Berghammer, "I have some reservations about doing this."

34. On another occasion, during a meeting with Defendant Perkins, Plaintiff explicitly told Defendant Perkins that he did not feel comfortable with Defendants' illegal hiring scheme.

35. In short, Plaintiff advised Defendants Perkins and Berghammer on numerous occasions that Defendants Berghammer and Armstead's hiring practices were improper.

36. Further, Plaintiff advised Defendant Perkins that Defendant Armstead should not be forcing administrators to select candidates for hire that had been preselected by Defendant Armstead.

37. Critically, Defendants were well aware that their hiring practices were discriminatory. In fact, during a planning session with Defendants Berghammer and Perkins, and a few other employees of Defendant Linden, Defendants were confronted with the fact that their scheme was discriminatory.

38. Specifically, Pamela Caporale ("Ms. Caporale"), also employed by Defendant Linden, inquired to Defendant Berghammer at said planning session, **"I did have a quick question, can we get sued for saying that [referencing Defendants' illegal hiring scheme]?"**

39. In response to same, Defendant Perkins responded, **"Yes."**

40. When Defendant Berghammer asked why the hiring scheme could get Defendants "in trouble," Ms. Caporale responded, **"Because technically that is discrimination, right?"**

41. Again, Defendant Perkins agreed and quipped, **"It is."**

42. However, instead of taking remedial action in response to Plaintiff's repeated complaints and objections, or acting on her own admission that Defendants' hiring practices were discriminatory, Defendant Perkins continually ignored Plaintiff's complaints and instead directed Plaintiff to continue to meet with Defendants Berghammer and Armstead to select their desired candidates, in spite of the fact that same was unlawful.

43. Further, on or about January 24, 2024, Defendant Perkins suddenly began critiquing Plaintiff's work performance via emails and formal memoranda.

44. This was, of course, in stark contrast to the exemplary work performance detailed in Plaintiff's prior job evaluations which memorialize Plaintiff's job performance as "highly rated."

45. Suffice to say, the aforementioned critiques to which Plaintiff has been subjected were fabricated so as to retaliate against Plaintiff for his whistleblowing and reflect Defendants' overt retaliatory animus targeted towards Plaintiff with respect to his complaints concerning Defendants' blatantly illegal scheme.

46. At his wit's end, on February 5, 2024, Plaintiff lodged a written complaint to Defendant Perkins, explicitly referencing Defendants' unlawful hiring scheme and Defendants' subsequent retaliation targeted towards him. Plaintiff's February 5, 2024 complaint in that regard is reproduced in its entirety below:

> Superintendent Perkins,
>
> This email is to memorialize our numerous conversations regarding the unethical and violations of the law regarding the

> unfair hiring practices in Linden. You, Mayor Armstead, and Dr. Berghammer have subjected me to have to meet with Mayor Armstead and Dr. Berghammer at the Mayor's office to review who they continue to want to hire on the personnel agenda. I have expressed to you, on multiple occasions, that this practice was not right and you have continued to direct me to meet with Mayor Armstead and Dr. Berghammer to select their people. Most recently, on January 22, 2024, I shared with you my unwillingness to continue with this unethical practice, and you retaliated against me.
>
> Since January 22, 2024, you have issued me a memo and various emails calling into question my work. As I have stated on multiple occasions, being required to do both the Human Resources and overseeing all of Academic PreK-12 was an unrealistic expectation for one person to handle. You have neglected to provide me with support to conduct both jobs effectively, despite my multiple requests for assistance. I feel your actions are in retaliation to me bringing to your attention that the hiring practices are unethical because of Linden Public School District wanting to only hire residents of Linden who are of Black and of Haitian decent.
>
> Your directives to continue to meet with Mayor Armstead and Dr. Berghammer, as well as your hostile and undermining treatment towards me has affected me and has created a hostile work environment. I am seeking permission to utilize my accumulated sick and vacation time to tend to my personal needs.
>
> Lastly, due to my current situation, I will not be able to attend scheduled professional developments in February 2024 that were board approved prior to this situation.
>
> Regards,
>
> Paul Oliveira

47. On February 6, 2024, and without conducting any investigation whatsoever into Plaintiff's complaints, Defendant Perkins dispatched correspondence to Plaintiff self-servingly claiming that Plaintiff's allegations were "unequivocally untrue," despite the overwhelming evidence to the contrary that Plaintiff had previously presented to Defendant Perkins. Likewise, when Plaintiff's allegations were raised with Defendant Linden's General Counsel, Joseph A.

Garcia, Esq. ("Mr. Garcia") of Cleary Giacobbe Alfieri Jacobs, LLC, same were perfunctorily and almost immediately dismissed by Mr. Garcia.

48. In short, Defendant Linden's work environment became so unbearable that, on February 6, 2024, Plaintiff had to take protected sick leave to deal with the extreme emotional distress he was experiencing with respect to same.

49. Again indicative of Defendants' campaign of retaliation directed towards Plaintiff, however, Defendant Perkins also immediately demanded an extensive list of medical documentation from Plaintiff with respect to said medical leave.

50. Further exemplifying the retaliation to which Plaintiff has been subjected, other male and female employees' requests for sick leave in Defendant Linden's district have been handled in a markedly different fashion; indeed, (1) prior female employees have been placed on administrative leave without having to use their accumulated sick time to address their medical conditions; and (2) other male employees who needed sick leave have been allowed to use nearly six (6) months of their time before being asked for additional medical documentation and/or did not have to submit supporting medical documentation for over a year.

51. Unable to deal with the workplace hostility any longer, Plaintiff notified Defendants of his constructive termination on April 17, 2024, as follows:

> Dear Superintendent Perkins,
>
> I am writing to confirm that Linden Public Schools have constructively terminated me from my position, effective sixty (60) days from the date of this email.
>
> It deeply saddens me that Linden has terminated me, as I have always been dedicated to my role and committed to contributing positively to the success of Linden Public Schools. However, recent events have made it clear to me that my current work situation has become untenable and that I have suffered a constructive termination.

> Specifically, throughout my time at Linden Public Schools, there have been repeated occurrences of unfair hiring practices that have undermined the integrity of our workplace and created an atmosphere of inequality and mistrust. Understanding that said hiring practices were discriminatory and unlawful, I lodged numerous complaints with you concerning the same. Not only were my complaints ignored, but I was also subjected to a barrage of retaliation following my aforementioned complaints. Indeed, you suddenly began fabricating criticism of my work performance, creating a work environment so unbearably hostile that I had no choice but to take protected medical leave to deal with the stress and anxiety associated with the same. You then further retaliated against me in connection with my medical leave by demanding extensive medical documentation that other similarly situated employees have not been subjected to.
>
> I believe that every employee deserves to work in an environment that is free from discrimination and bias. Regrettably, the practices I have observed and experienced firsthand do not align with these principles. Despite my efforts to address these concerns through proper channels, I have not seen meaningful steps taken to rectify the situation.
>
> Given the circumstances, it is abundantly clear that I have been constructively terminated from my position.
>
> I will do everything in my power to ensure a smooth transition during my remaining time with the district. Please let me know if there are any specific tasks or projects that require my attention before my termination goes into effect. I would also like to coordinate a date and time to return my Linden Public Schools ID, Key Fob, and iPad, as well as collect my personal belongings.

52. As a direct result of the joint and several acts and omissions of the Corporate Defendants, Individual Defendants, John Does (1-5), and ABC Corporations (1-5), Plaintiff has, and continues to, suffer non-economic damages in the form of humiliation, stress, and anxiety, causing him mental and emotional anguish and dysfunction and physical manifestations of same, including, but not limited to, nightmares, inability to sleep, weight loss, headaches, panic attacks,

crying, negative thoughts, nervousness, anxiousness, anxiety attacks, upset stomach, and stomach pains, all or some of which may be permanent.

COUNT ONE

LAD – RETALIATION/IMPROPER REPRISAL

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

54. Plaintiff complained and/or protested against the continuing course of hiring practices in violation of the LAD set forth at length above. Defendants had knowledge about those complaints and/or protests.

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

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

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

WHEREFORE, Plaintiff demands judgment in his 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, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT TWO

CEPA – RETALIATION

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

59. Defendants are "employers" of Plaintiff in accordance with the CEPA, defined as "any individual, partnership, association, corporation or *any person or group of persons acting directly or indirectly on behalf of or in the interest of an employer with the employer's consent."* N.J.S.A. 34:19-2(a).

60. Throughout the course of his employment, Plaintiff reported and complained of Defendants' unlawful behavior.

61. Defendants had knowledge of Plaintiff's complaints and/or protests.

62. As a direct result of Plaintiff raising complaints and/or threatening to disclose raising complaints, Defendants took retaliatory action against Plaintiff, which is outlined above.

63. Defendants are vicariously, strictly, and/or directly liable to Plaintiff for unlawful retaliation in violation of CEPA, pursuant to N.J.S.A. 34:19-1, et seq.

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

WHEREFORE, Plaintiff demands judgment in his favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under CEPA, 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. More specifically, Plaintiff demands judgment against Defendants for harm suffered in violation of CEPA 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 CEPA 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-retaliation training;
N. Ordering Defendants to undergo anti-harassment training;
O. Ordering Defendants to undergo workplace civility training;
P. Ordering Defendants to undergo bystander intervention training;
Q. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-retaliation training;
R. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-harassment training;
S. Ordering Defendants to engage a research organization to assess the effectiveness of their workplace civility training;
T. Ordering Defendants to engage a research organization to assess the effectiveness of their bystander intervention training;
U. Ordering Defendants to identify an appropriate professional to investigate any future complaints of discrimination;
V. Ordering Defendants to identify an appropriate professional to investigate any future complaints of harassment;
W. Ordering Defendants to identify an appropriate professional to investigate any future complaints of retaliation; and
X. 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, Paul Oliveira

By: */s/ R. Armen McOmber*
R. ARMEN McOMBER, ESQ.

Dated: May 23, 2024

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, R. ARMEN McOMBER, 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, Paul Oliveira

By: */s/ R. Armen McOmber*
R. ARMEN McOMBER, ESQ.

Dated: May 23, 2024

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PAUL OLIVEIRA, Plaintiff, v. BOARD OF EDUCATION OF THE CITY OF LINDEN, IN THE COUNTY OF UNION; MARLENE BERGHAMMER; ATIYA Y. PERKINS; DEREK ARMSTEAD; 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 UNION COUNTY DOCKET NO.: Civil Action **FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS**

FIRST SET OF DOCUMENT REQUESTS, INTERROGATORIES, AND PUNITIVE DAMAGES TO DEFENDANT(S)

PLEASE TAKE NOTICE that McOmber McOmber & Luber, P.C., attorneys for Plaintiff, Paul Oliveira ("Plaintiff"), demand that Defendant Board of Education of the City of Linden, in the County of Union ("Defendant Linden"), Defendant Marlene Berghammer ("Defendant Berghammer"), Defendant Atiya Y. Perkins ("Defendant Perkins"), and Defendant Derek Armstead ("Defendant Armstead") 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 Request 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, Defendants must respond to each request with specific responses applicable to each Plaintiff in this lawsuit.

2. "Defendant Linden" shall mean Board of Education of the City of Linden, in the County of Union, 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 Berghammer" shall mean Marlene Berghammer, Defendant in the above-captioned action.

4. "Defendant Perkins" shall mean Atiya Y. Perkins, Defendant in the above-captioned action.

5. "Defendant Armstead" shall mean Derek Armstead, Defendant in the above-captioned action.

6. "Defendant(s)" shall individually and collectively mean all Defendants in the above-captioned action.

7. 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.

8. 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.

9. The terms "you," "your," or "yours" shall mean the party answering these interrogatory questions.

10. "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.

11. "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.

12. The term "Action" shall mean the civil action captioned above.

13. The term "Complaint" shall mean the Complaint filed by Plaintiff(s) in this Action.

14. 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.

15. 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.

16. 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 Plaintiff.

17. "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.

18. 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.

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

20. 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.

21. 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.

22. 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.

23. The term "including" or "include" shall mean "including without limitation."

24. 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 Defendant(s) 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, set forth the date and place of the communication or statement, 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 Interrogatories for which no objection to claim of privilege is made.

17. If a refusal to answer a Document Request and/or Interrogatories 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 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 New Jersey's Whistleblower Statute.

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

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

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

14. A copy of all documents (written or electronic) relating to each and every instance since January 01, 2014, 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.

15. A copy of all documents (written or electronic) relating to each and every instance since January 01, 2014, 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 in any way, you investigated, handled, processed, and/or ultimately disposed of each and every such matter.

16. A copy of Defendant(s) written policy concerning reporting legal, fraud, deception, safety, health, policy, or regulatory violations or incidents.

17. All statements, documents, or communications that relate to federal or state inspection and/or investigation of Defendant(s) in the last five (5) years.

18. All statements, documents, or communications that relate to reporting misconduct, safety or health violations or incidents, and/or unlawful conduct to any regulatory or governmental authority.

19. All statements, documents, or communications that relate to all notices, violations, and/or warnings received by Defendant(s) over the past ten (10) years from any State and/or Federal and/or Local regulatory authorities who oversee, license, regulate, or discipline Defendant(s)' operations, and/or Defendant(s)' employees.

20. A copy of any and all WhatsApp messages between Defendant(s) in regard to Plaintiff and/or the allegations in the Complaint.

21. All statements, documents, or communications that relate to all laws, regulations, policies, or guidelines Defendant(s) follows or is required to follow in connection with its business.

22. A copy of any and all documents which pertain to any investigation conducted by Defendant(s) into the allegations made by Plaintiff, or which is referenced in the complaint.

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

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

25. 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.

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

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

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

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

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

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

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

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

34. 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.

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

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

37. 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.

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

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

40. 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.

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

42. 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).

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

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

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

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

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

48. 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.

49. 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.

50. 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).

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

52. 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. Identify by full name, job title, last known address, phone number and tenure of employment, all Persons Defendant(s) contends comprises its Litigation Control Group in this action and for each such identified person, the reasons for their inclusion in this group.

2. Identify by full name, job title, last known address, phone number, and email, all Person(s) presently employed by Defendant Linden.

3. Identify each Person answering these Interrogatories by stating his or her:

a. Full name;
b. Address,
c. Title and relationship to the party upon whom these Interrogatories were served;
d. His/her duties and responsibilities with the party upon whom these Interrogatories were served;
e. The date when the employment of the person answering these Interrogatories commenced;
f. The date upon which these Interrogatories were answered;
g. Whether you read and complied with the general instructions and definitions set forth in these Interrogatories (If not, explain in detail exactly how you failed to comply with these directions.); and
h. Any custodians of records with relevant knowledge of documents produced in this matter.

4. State if information set forth in the answers to these Interrogatories is based on personal knowledge. If not based on personal knowledge, set forth with specificity the sources of

information and belief.

5. Identify each person, not a party to the action, who assisted or participated in preparing and/or supplying any of the information given in answer to or relied in answering these Interrogatories.

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

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

8. Identity 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.

9. Identity 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.

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

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

12. State the last known address, last known telephone number, and last known email address for each Individual Defendant.

13. State the name, last known address, last known telephone number, and last known email address of all persons who are identified in the Complaint.

14. State the name, last known address, last known telephone number, and last known email address 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.

15. 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.

16. State whether Defendant(s), and or Defendant(s)' employees exchanged WhatsApp messages related to Plaintiff's complaints. Attach any such messages hereto.

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

18. 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.

19. 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.

20. Identify the names and addresses of any persons other than those named in the preceding three (3) 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.

21. 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.

22. 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.

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

24. State whether the Plaintiff was 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.

25. State whether the Plaintiff was 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.

26. Identity the date, time, location, and participants of each meeting where Plaintiff complained of discriminatory and/or harassing conduct in the workplace.

27. 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.

28. 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.

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

30. State whether Defendant(s) 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.

31. 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.

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

33. 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.

34. 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.

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

36. 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.

37. State whether Defendant(s) maintain a system or procedure for recording, investigating, and/or resolving employee complaints or grievances of retaliation. If so:

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

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

39. 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.

40. 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.

41. 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).

42. 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.

43. 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.

44. Identify each and every document relating to any and all complaints or Grievances made by Defendant(s)' employees relating to Defendant(s) in the past ten (10) years. Annex hereto a copy of each said document.

45. 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).

46. Identify each and every document relating to any and all complaints or Grievances (formal or otherwise) made by Defendant(s)' clients or customers relating to Defendant(s). Annex hereto a copy of each said document.

47. 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).

48. Please describe, in detail, the method by which an employee transfer (such as a transfer to another department or location) is conducted by Defendant(s).

49. Please describe, in detail, if there are any limitations on employee transfers (such as a transfer to another department or location) at Defendant(s).

50. Identify every paper, writing, memorandum, or document of every kind and description of which Defendant(s) have knowledge which is, in any way, intended to support any claim, defense, affirmative defense, or factual allegation, or to be used by Defendant(s) in any manner, 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 Defendant(s)' answers to these Interrogatories. Annex hereto a copy of each said document. For each such document or tangible thing upon which Defendant(s) will rely in support of Defendant(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.

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

52. Identify each document in Defendant(s)' possession or control, in addition to the documents referred to in other answers to these Interrogatories, which is in any way related to the subject matter of this litigation. Annex hereto a copy of each said document.

53. 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.

54. 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; and
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.

55. 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.

56. 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.

57. 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).

58. 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.

59. 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.

60. 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.

61. 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.

62. 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.

63. 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.

64. 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.

65. 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.

66. 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.

67. 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.

68. Identify each email account each Defendant(s) utilized as an employee of Defendant(s) in the last three (3) years.

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

70. 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.

71. 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.

72. 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).

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

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

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

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

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

78. Identify any and all laws, regulations, policies, or guidelines Defendant(s)' employees follow or are required to follow concerning reporting misconduct and/or unlawful conduct to any regulatory or governmental authority.

79. Identify and describe any and all laws, regulations, policies, or guidelines Defendant(s)' employees follow or are required to follow concerning licensing in connection with Defendant(s)' businesses.

80. Identify and describe any and all laws, regulations, policies, or guidelines

Defendant(s) follows or is required to follow concerning insurance in connection with its business.

81. Identify and provide full details concerning any New Jersey Department of Labor, Federal Bureau of Investigation, Attorneys' General Office, U.S. Attorney's Office Investigation, or any other regulatory body or law enforcement agency, of Defendant(s) in the last five (5) years.

82. Identify and provide full details concerning all regulatory compliance trainings conducted by Defendant(s) in the past five (5) years.

83. 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.

84. Identify and describe, in detail, instances when Plaintiff reported, complained, and/or stated a Grievance (formal or otherwise) to any Defendant(s), including Defendant(s)' agents, regarding reporting misconduct and/or unlawful conduct in connection with Defendant(s)' business.

85. Identify and describe each state and/or federal inspection and/or investigation of Defendant(s) in the last five (5) years.

86. Identify and describe when and how Defendant(s) were notified of each state and/or federal inspection and/or investigation of Defendant(s) in the last five (5) years.

87. Describe, in full detail, the circumstances surrounding the termination of Plaintiff's employment.

88. Identify and describe in detail each communication between any employee of Defendant(s), regarding the matters contained in the Complaint. Annex hereto any documents relevant to this request.

89. Identify and describe in detail each communication between any employee of Defendant(s), regarding the Plaintiff. Annex hereto any documents relevant to this request.

90. Identify and describe Defendant(s)' policy regarding incidents of unlawful conduct.

91. Identify and describe Defendant(s)' policy regarding reporting incidents related to the subject matter of this litigation.

92. Identify all regulatory authorities (both state and federal) that oversee Defendant(s).

INTERROGATORIES TO INDIVIDUAL DEFENDANT(S) ONLY

93. 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.

94. 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.

95. 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.

96. 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 2014 through 2024 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 2014 through 2024, 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 2014 through 2024, 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 2014 through 2024, 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 2014 through 2024, up to and including the present.

INTERROGATORIES RELATED TO PUNITIVE DAMAGES FOR DEFENDANT(S)

97. 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; and
l. The name and address of the person who has custody of this corporation's books and records.

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

99. 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; and
f. The nature of the business in which engaged.

100. 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; and
e. The number of individuals presently employed at the facility.

101. 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.

102. 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.

103. Specifically state the present location of all books and records of the

Defendant(s), including checkbooks.

104. 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).

105. 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.

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

107. 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; and
g. The names and addresses of all tenants and monthly rentals paid by each tenant.

108. 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; and
d. If there is a lien on the vehicle, the name and address of the lienholder and the amount due on the lien.

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

110. For any transfer of business assets that has occurred within six (6) 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.); and
d. Explain in detail what happened to the consideration paid for the asset.

111. 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; and
e. Docket number.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Paul Oliveira

By: */s/ R. Armen McOmber*
R. ARMEN McOMBER, ESQ.

Dated: May 23, 2024

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: _____, 2024 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: _____, 2024 By:_____

Civil Case Information Statement

Case Details: UNION | Civil Part Docket# L-001937-24

Case Caption: OLIVEIRA PAUL VS LINDEN BOARD OF EDUC ATION
Case Initiation Date: 05/23/2024
Attorney Name: RICHARD ARMEN MC OMBER
Firm Name: MCOMBER MCOMBER & LUBER, PC
Address: 54 SHREWSBURY AVE
RED BANK NJ 07701
Phone: 7328426500
Name of Party: PLAINTIFF : Oliveira, Paul
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: Paul Oliveira? 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 **Medical Debt Claim?** 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)

05/23/2024
Dated

/s/ RICHARD ARMEN MC OMBER
Signed