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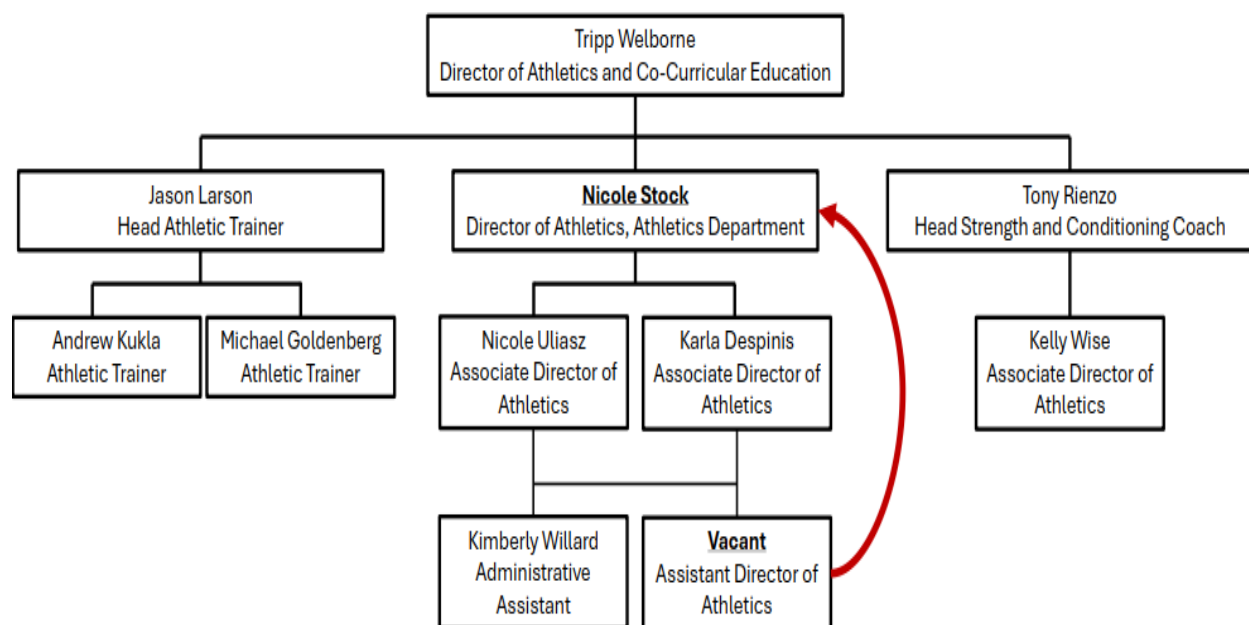
Attorneys for Plaintiffs, Karla Despinis and Richard Anthony Rienzo

KARLA DESPINIS AND RICHARD ANTHONY RIENZO, Plaintiffs, vs. THE LAWRENCEVILLE SCHOOL; SULLIVAN ANTHONY “TRIPP” WELBORNE III; EMILIE KOSOFF; KRISTEN OBERLIN; ABC COMPANIES 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names of presently unidentified individuals), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MERCER COUNTY DOCKET NO.: <u>Civil Action</u> COMPLAINT & DEMAND FOR TRIAL BY JURY
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Plaintiffs, Karla Despinis (“Plaintiff Despinis”) and Richard Anthony Rienzo (“Plaintiff Rienzo”) (collectively, “Plaintiffs”), by way of Complaint against The Lawrenceville School (“Defendant Lawrenceville” and/or “Corporate Defendant”), Sullivan Anthony “Tripp” Welborne III (“Defendant Welborne”), Emilie Kosoff (“Defendant Kosoff”), and Kristen Oberlin (“Defendant Oberlin”) (collectively, “Individual Defendants”) (together with Corporate Defendant, “Defendants”) allege as follows:

INTRODUCTION

After decades of employment with Defendant Lawrenceville, Plaintiffs were forced out of their roles when, upon information and belief, Defendant Welborne, Plaintiffs' married supervisor, began an inappropriate *quid-pro-quo* sexual, gender-based, and/or romantic relationship with another employee, Nicole Stock, wherein Defendant Welborne rewarded Ms. Stock with gifts, favorable treatment, and promotions. Defendant Welborne went so far as to create a new role in order to promote Ms. Stock.



After Plaintiffs reported this quid pro quo relationship and expressed concerns about how this relationship affected the operations of Defendant Lawrenceville's Athletic Department, they were excommunicated by Defendant Welborne and faced the ultimate form of retaliation – termination. Accordingly, Plaintiffs bring this lawsuit to fully expose Defendants' unlawful conduct and to seek redress for unlawful discrimination and retaliation in violation of New Jersey law.

PARTIES

1. Plaintiff Despinis is a female residing in Seaside Heights, New Jersey. At all times relevant hereto, Plaintiff Despinis was employed by Defendant Lawrenceville as Associate Director of Athletics and Head of House from 2013 to 2023.

2. Plaintiff Rienzo is a male residing in Flemington, New Jersey. At all times relevant hereto, Plaintiff Rienzo was employed by Defendant Lawrenceville as Head Strength and Conditioning Coach.

3. Defendant Lawrenceville is a private preparatory school organized and existing under the laws of the State of New Jersey with its principal place of business located at 2500 Main Street, Lawrenceville, New Jersey. At all times relevant hereto, Defendant Lawrenceville is an “employer” as defined under the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, *et seq.* (“NJLAD”) and directly employed Plaintiffs and Defendant Welborne.

4. Defendant Welborne, upon information and belief, is a married individual residing in Lawrenceville, New Jersey. At all times relevant hereto, Defendant Welborne was employed by Defendant Lawrenceville as Dean of Athletics and Co-Curricular Education, Athletics Department. This claim is brought against Defendant Welborne in his individual capacity and/or as an agent and/or employee of Defendant Lawrenceville.

5. Defendant Kosoff, upon information and belief, is an individual residing in Lawrenceville, New Jersey. At all times relevant hereto, Defendant Kosoff was employed by Defendant Lawrenceville as Associate Head of School and Dean of Faculty. This claim is brought against Defendant Kosoff in her individual capacity and/or as an agent and/or employee of Defendant Lawrenceville.

6. Defendant Oberlin, upon information and belief, is an individual residing in Lawrenceville, New Jersey. At all times relevant hereto, Defendant Oberlin was employed by Defendant Lawrenceville as Human Resources Director. This claim is brought against Defendant Oberlin in her individual capacity and/or as an agent and/or employee of Defendant Lawrenceville.

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

8. Upon information and belief, 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-relation policies of Corporate Defendant and are currently unidentified individuals who may have liability for the damages suffered by Plaintiffs under any theory advanced herein.

FACTS COMMON TO ALL CLAIMS

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

10. Defendant Lawrenceville is a private preparatory and boarding school that “challenges a diverse community of promising young people to lead lives of learning, integrity, and high purpose.”¹

¹ See <https://www.lawrenceville.org/> (Last Accessed June 18, 2025).

11. Defendant Lawrenceville has several departments, including an Athletic Department, which directly employed Plaintiffs and Defendant Welborne. As Dean of Athletics and Co-Curricular Education, Defendant Welborne oversaw Defendant Lawrenceville's Athletics Department and was responsible for supervising employees in the Athletics Department, including Plaintiffs and Nicole Stock, Defendant Lawrenceville's Director Athletics, Athletics Department.

12. Defendant Lawrenceville hired Defendant Welborne, a retired NFL player and University of Michigan Hall of Honor Inductee, in 2015 as Athletic Director.

13. In or around Spring 2022, Defendant Lawrenceville promoted Defendant Welborne to Dean of Athletics and Co-Curricular Education, Athletics Department.

14. In or around 2018, Defendant Lawrenceville hired Nicole Stock ("Ms. Stock") as Assistant Director of Athletics.

PLAINTIFFS' EMPLOYMENT WITH DEFENDANT LAWRENCEVILLE

15. In or around 2005 Plaintiff Despinis commenced employment with Defendant Lawrenceville as Administrative Assistant.

16. Defendant Lawrenceville was thrilled with Plaintiff Despinis' performance and in 2012, promoted Plaintiff Despinis to Assistant Director of Athletics and Head of House.

17. Defendant Lawrenceville promoted Plaintiff Despinis to Associate Director of Athletics in 2017.

18. Among other things, Plaintiff Despinis was responsible for meeting with Defendant Lawrenceville coaches seasonally to plan and negotiate schedules that comply with conference and league guidelines, personally scheduling approximately 1,000 athletics contests for fifty-two (52) teams, directing various tournaments and ensure tournaments comply with regional, state, and league guidelines, coordinating transportation for 500 away athletic contests each year,

representing Defendant Lawrenceville at Mid-Atlantic Prep League, Mercer County Athletic Director's Association, and serving as primary administrator for athletic policies, operations, procedures, and scheduling.

19. At all relevant times, Plaintiff Despinis excelled in her role at Defendant Lawrenceville, as evidenced by the fact that her contract was renewed annually for twenty years and she was promoted three times since her hiring.²

20. In or around July 2004 Plaintiff Rienzo commenced employment with Defendant Lawrenceville as an Intern in the Strength and Conditioning Department.

21. Defendant Lawrenceville was thrilled with Plaintiff Rienzo's performance and in March 2005, invited Plaintiff Rienzo to work as Part-Time Assistant Strength Coach.

22. Defendant Lawrenceville promoted Plaintiff Rienzo for a third time in July 2005 when they converted his part-time role to a full-time one.

23. In March 2011, Defendant Lawrenceville promoted Plaintiff Rienzo for a fourth time to Head Strength and Conditioning Coach.

24. Among other things, Plaintiff Rienzo was responsible for scheduling, managing, and implementing training programs for multiple athletic teams each season, scheduling and managing over 100 students each term within Sports Performance and General Fitness training groups, designing and implementing off-season training and recovery programs for out of season athletes, coordinating purchase and maintenance of equipment, and teaching a personal development seminar to freshman and sophomore students.

25. Plaintiff Rienzo excelled in his role at Defendant Lawrenceville, as evidenced by the fact that he was promoted four times since his hiring and his contract was renewed annually.

² Defendant Lawrenceville does not offer long-term employment contracts or tenure. Instead, Defendant Lawrenceville renews faculty contracts annually.

**DEFENDANT WELBORNE AND NICOLE STOCK BEGIN AN INAPPROPRIATE
RELATIONSHIP BASED UPON GENDER/SEX**

26. In or around 2021 Plaintiffs noticed that Defendant Welborne and Ms. Stock were flirting at work, touching each other, and spending an increased amount of time together unrelated to their work. Plaintiffs suspected that Defendant Welborne and Ms. Stock were engaging in an inappropriate intimate relationship.

27. By way of example but not limitation, Defendant Welborne and Ms. Stock often hugged and touched each other at work.

28. On one occasion Defendant Welborne announced that Ms. Stock needed a hug, so Defendant Welborne hugged her tightly.

29. Ms. Stock and Defendant Welborne often sat so closely on the couch after work hours that their thighs would touch each other. Multiple employees witnessed this behavior and noted that it was odd.

30. On another occasion, Ms. Stock grabbed Defendant Welborne's butt at a Defendant Lawrenceville hockey game.

31. Ms. Stock and Defendant Welborne always sat next to each other in meetings, often so closely that their arms were touching. Throughout meetings, Defendant Welborne and Ms. Stock would giggle amongst themselves, touch each other's arms often in a flirtatious manner, and hit each other's legs under the table.

32. During meetings, Defendant Welborne and Ms. Stock would often flirt with each other and engage in side conversations that excluded other meeting attendees.

33. The two would also share a laptop despite the fact that both Defendant Welborne and Ms. Stock have their own laptops for work.

34. Further, Defendant Welborne and Ms. Stock spent an unusual amount of time together outside of work.

35. For example, Defendant Welborne stores his bike at Ms. Stock's apartment despite the fact that he has a house close to campus with a garage.

36. Defendant Welborne and Ms. Stock typically came late to work events and arrived together, coming from Ms. Stock's apartment, indicating that the two were spending time privately prior to the event. During work events, Defendant Welborne and Ms. Stock would sit next to each other, tease one another flirtatiously, and giggle.

37. Defendant Welborne and Ms. Stock also regularly arrived to work together, further confirming that the two were spending time together prior to work.

38. Ms. Stock also knew personal details about Defendant Welborne, such as his whereabouts outside of work, appointments he had, and information about his children. Other employees were unaware of such details.

39. When Defendant Welborne was on vacation, Ms. Stock took care of his personal dog.

40. Defendant Welborne and Ms. Stock also bickered at work about trivial matters. When the two disagreed, they would engage in flirtatious banter with one another. Faculty members likened the bickering to that of a married couple.

41. Defendant Welborne and Ms. Stock spent most of their time at work together and Defendant Welborne treated Ms. Stock more favorably than other employees.

42. For example, Defendant Welborne would spend gamedays riding around on Ms. Stock's John Deere ATV.

43. Notably, Defendant Welborne purchased the John Deere ATV specifically for Ms. Stock's use.

44. Plaintiff Despinis questioned Defendant Welborne as to why Ms. Stock was given her own vehicle when, at the time, Plaintiff and Ms. Stock had the same job title. Defendant Welborne alleged that the new John Deere was for everyone to use. This was false, as Ms. Stock put a personal license plate on the vehicle and was the only employee who regularly used it.

45. Later, in spring 2024, at the suggestion of Defendant Welborne, Defendant Lawrenceville adopted a bulldog puppy as its mascot. Defendant Welborne and Ms. Stock designed a logo with the puppy's face and ordered custom made matching clothes with the logo they created. Defendant Welborne and Ms. Stock often wore their matching outfits to work.

46. Ms. Stock received favorable treatment at work due to her inappropriate personal relationship with Defendant Welborne, her supervisor. Plaintiffs became concerned that Defendant Welborne was engaging in a quid pro quo relationship with Ms. Stock.

47. Defendant Welborne made clear that Ms. Stock was his right hand and often excluded Plaintiffs from important updates and conversations about the Athletics Department.

48. Indeed, Defendant Welborne often cancelled or refused to schedule meetings with Plaintiffs to discuss updates in the department and support Plaintiffs in their roles.

49. By way of example, when Kelly Wise ("Ms. Wise"), was promoted to Defendant Lawrenceville's Co-Head Strength and Conditioning Coach, Defendant Welborne altogether failed to inform Plaintiff Rienzo of the change in staff and the new breakdown of his job responsibilities.

50. On other occasions, Defendant Welborne entirely failed to communicate important updates to Plaintiffs. Meanwhile, Defendant Welborne kept Ms. Stock informed of all updates affecting the Athletics Department.

51. While Defendant Welborne failed to meet with Plaintiffs one on one, Defendant Welborne regularly met with Ms. Stock individually.

52. It became increasingly clear to Plaintiffs that Defendant Welborne and Ms. Stock were likely engaging in a quid pro quo sexual relationship. Plaintiffs reasonably believed that Defendant Welborne was using his position of power to entice Ms. Stock into a sexual relationship in exchange for preferential treatment at work.

**PLAINTIFFS COMPLAIN ABOUT MS. STOCK AND DEFENDANT WELBORNE'S
INAPPROPRIATE RELATIONSHIP AND ITS EFFECT ON THE ATHLETICS
DEPARTMENT**

53. On or around February 18, 2022, Plaintiff Rienzo complained to Defendant Kosoff, Defendant Lawrenceville's Dean of Faculty, to discuss Defendant Welborne's lack of communication with and poor treatment of Plaintiff Rienzo.

54. Plaintiff Rienzo explained that the environment in the Athletics Department had become hostile due to Defendant Welborne's refusal to communicate with employees other than Ms. Stock.

55. Later, on or around February 22, 2023, Plaintiff Despinis complained to Defendant Kosoff and Defendant Oberlin, Defendant Lawrenceville's Human Resources Director, about Ms. Stock and Defendant Welborne's inappropriate relationship.

56. Plaintiff Despinis reported Ms. Stock and Defendant Welborne's ongoing relationship and raised concerns that this relationship and related preferential treatment of Ms. Stock was a hindrance to Defendant Lawrenceville's Athletics Department.

57. Plaintiff Despinis stated that Ms. Stock and Defendant Welborne flirt with one another and spend an unusual amount of time alone together. Plaintiff Despinis noted that as a result of the time Defendant Welborne spends with Ms. Stock, the frequency of department meetings and updates was dwindling. Plaintiff Despinis complained that Defendant Welborne stopped having regular one on one meetings with employees other than Ms. Stock. Notably, prior to the beginning of their relationship, Defendant Welborne often met with employees individually to discuss updates.

58. Plaintiff Despinis asked Defendant Kosoff and Defendant Oberlin for guidance on how to proceed and noted that Defendant Welborne's relationship with Ms. Stock made the work environment and performance of job duties extremely difficult due to Defendant Welborne's clear favoritism.

59. Defendant Kosoff and Defendant Oberlin thanked Plaintiff Despinis for the information and promised to get back to her.

60. Defendant Kosoff and Defendant Oberlin oddly informed Plaintiff Despinis that she does not need to fear retaliation for complaining about Ms. Stock and Defendant Welborne's inappropriate relationship.

61. Defendant Kosoff and Defendant Oberlin never followed up regarding Plaintiff Despinis' complaints.

62. Unfortunately, in or around Fall of 2023, Defendants retaliated against Plaintiff Despinis for her complaints by placing her on a Community Action Plan ("CAP"), Defendant Lawrenceville's performance improvement plan.

63. Prior to her complaints regarding Ms. Stock and Defendant Welborne's relationship, Plaintiff Despinis never underwent a performance review nor was she ever given negative feedback regarding her performance.

64. The CAP was pure retaliation for Plaintiff's complaints.

65. Fortunately, Plaintiff successfully completed her CAP. Thereafter, Plaintiff did not receive any further negative feedback regarding her performance.

66. To make matters worse, the inappropriate conduct between Defendant Welborne and Ms. Stock continued, making clear that Defendant Kosoff and Defendant Oberlin did not address Plaintiffs' concerns.

67. Plaintiffs' complaints put Defendant Kosoff and Defendant Oberlin on notice of Defendant Welborne's quid pro quo relationship with Ms. Stock.

DEFENDANT WELBORNE CREATES A NEW ROLE TO PROMOTE MS. STOCK

68. Shortly after Plaintiffs' complaints, in or around May 2023, Defendant Welborne announced the creation of a new role, Director of Athletics.

69. Plaintiffs suspected that Defendant Welborne created this role to promote Ms. Stock in exchange for her engagement in an inappropriate relationship with Defendant Welborne.

70. On or around September 12, 2023, Plaintiff Rienzo met with Defendant Kosoff to express concerns about Defendant Welborne's creation of the new role. Plaintiff Rienzo stated that he thought the creation of the role was concerning because Defendant Welborne was already not communicating with Plaintiffs and this new promotion may contribute further to the breakdown of communication with Defendant Welborne.

71. Two people applied for the role of Director of Athletics. Defendant Welborne interviewed the candidates in or around November 2023. Unsurprisingly, Defendant Welborne awarded the Director of Athletics Role to Ms. Stock in February 2024.

72. Ms. Stock's promotion confirms that Defendant Welborne was engaging in a quid pro quo relationship with Ms. Stock.

73. After Ms. Stock was promoted, her relationship with Defendant Welborne continued, and Defendant Lawrenceville's work environment became increasingly hostile.

DEFENDANTS RETALIATE AGAINST PLAINTIFFS FOR THEIR COMPLAINTS OF QUID PRO QUO SEXUAL/GENDER/DISCRIMINATION HARASSMENT

74. In or around April 2025, Plaintiff Despinis requested a copy of her personnel file. Lucy Vetter ("Ms. Vetter"), Defendant Lawrenceville's Assistant Director, Office of Human Resources, provided Plaintiff Despinis a copy.

75. When Plaintiff Despinis checked her personnel file, she noticed that it did not contain her complaints regarding Defendant Welborne and Ms. Stock's relationship. Plaintiff Despinis asked Ms. Vetter where her complaints were.

76. Ms. Vetter informed Plaintiff Despinis that her complaints about Defendant Welborne were placed in Defendant Welborne's personnel file, and that Defendant Welborne could see these complaints.

77. Upon information and belief, Defendant Welborne requested a copy of his own personnel file and learned that Plaintiffs complained about his relationship with and preferential treatment of Ms. Stock.

78. Plaintiffs realized that Defendant Welborne's refusal to engage with Plaintiffs to the detriment of Defendant Lawrenceville's Athletics Department was pure retaliation for their complaints.

79. Thereafter, Plaintiffs were separately informed that, for the first time, their contracts were being put “on hold” for the 2025-2026 school year due to purported budgetary concerns.

80. Defendant Kosoff and Defendant Oberlin informed Plaintiff Rienzo that his contract may not be renewed on or around February 17, 2025. The following day, February 18, 2025, Defendant Kosoff and Defendant Oberlin communicated the possible non-renewal to Plaintiff Despinis.

81. Plaintiffs were shocked by this news, as their contracts had been renewed annually for decades and Defendant Kosoff and Defendant Oberlin were the individuals who Plaintiffs confided in regarding Defendant Welborne’s quid pro quo relationship with Ms. Stock.

82. Approximately one month later, Plaintiffs suffered the ultimate form of retaliation – termination.

83. On or around March 24, 2025, Defendant Kosoff and Stephen Murray (“Mr. Murray”), Defendant Lawrenceville’s Head of School, informed Plaintiff Despinis that for the first time in decades, her contract would not be renewed for the 2025-2026 school year.

84. The following day, on or around March 25, 2025, Defendant Kosoff and Mr. Murray informed Plaintiff Rienzo that for the first time in decades, his contract would not be renewed for the 2025-2026 school year.

85. Defendants alleged that Plaintiffs’ contracts were not renewed due to purported budgetary concerns. Upon information and belief, Individual Defendants worked together to make the decision to non-renew Plaintiffs’ contracts for the 2025-2026 school year.

86. Defendants’ reason for Plaintiffs’ termination is pure pretext designed to conceal Defendants’ discriminatory and retaliatory animus.

87. First, Defendant Lawrenceville is a centuries-old educational institution that charges the highest tuition out of all private schools in the State of New Jersey. Furthermore, Defendant Lawrenceville has in excess of \$730,000,000 in endowments.

88. While in early 2025, Defendant Lawrenceville announced small changes to employee benefits due to purported budgetary concerns, such as charging employees to utilize on-site daycare programs and reducing the fund used to send employees' children to Defendant Lawrenceville at no cost, Defendant Lawrenceville ultimately did not make these changes. This confirms that Defendant Lawrenceville is not experiencing budgetary or financial issues that would justify non-renewal of two long-standing employees. Upon information and belief, another faculty member's contract was non-renewed. Defendant Lawrenceville instead offered this employee a full-time contract to work in another department.

89. Second, Plaintiffs were the only two full-time faculty members in Defendant Lawrenceville's Athletics Department whose contracts were not renewed.

90. Upon information and belief, Plaintiffs were the only two employees who reported Defendant Welborne and Ms. Stock's quid pro quo relationship to Defendants Oberlin and Kosoff.

91. Defendant Oberlin, Defendant Kosoff, and Defendant Welborne, who made the decision not to renew Plaintiffs' contracts, were all aware of Plaintiffs' complaints regarding Defendant Welborne's quid pro quo relationship with Ms. Stock and terminated Plaintiffs in clear retaliation for their complaints.

92. To make matters worse, following Plaintiffs' unlawful termination, Defendant Lawrenceville did not initially ask Plaintiffs, who each worked for Defendant Lawrenceville for over twenty years, if they would like to have a student write a yearbook shoutout for Plaintiffs.³

93. Further, after Plaintiffs' contracts were non-renewed, Defendants ostracized them further from Defendant Lawrenceville's Athletic Department. By way of example, but not limitation, Defendants did not invite Plaintiffs to the Athletic Department's end of year gathering.

94. As a result of their unlawful terminations, Plaintiffs have suffered and continue to suffer damages, which include but are not limited to severe emotional distress; lost wages; loss of benefits and paid time off; loss of free tuition for Plaintiff Rienzo's children at Defendant Lawrenceville; and loss of housing for Plaintiff Despinis.

COUNT ONE

NJLAD – DISPARATE TREATMENT DISCRIMINATION DUE TO SEX/GENDER

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

96. Plaintiffs were subjected to discrimination and disparate treatment on account of their sex and/or gender.

97. The above-described conduct, specifically, the termination of Plaintiffs' employment would not have occurred but for their sex/gender.

98. Defendants did not have an effective anti-harassment policy in place, Defendants have not maintained an anti-harassment policy that is current and effective, and Defendants' anti-harassment policy existed in name only.

³ Customarily, when faculty or staff is non-renewed or resigns, Defendant Lawrenceville asks the faculty member if they would like for a student to write a yearbook shoutout or thank you note to show appreciation for the faculty member's work at Defendant Lawrenceville.

99. Defendants did not maintain useful formal and informal complaint structures for victims of discrimination, harassment, and retaliation.

100. Defendants did not properly train their supervisors and/or employees on the subject of discrimination, harassment, and retaliation.

101. Defendants failed to institute appropriate monitoring mechanisms to check the effectiveness of the policies and complaint structures.

102. Defendants did not have a commitment from the highest levels of management that discrimination and harassment will not be tolerated.

103. As a result of the above discriminatory conduct, Plaintiffs experience ongoing and debilitating emotional distress and experiences significant economic damages.

104. As the employers and/or supervisors of the Plaintiffs, Corporate Defendant is vicariously, strictly, and/or directly liable to the Plaintiff pursuant to the NJLAD, N.J.S.A. 10:5-1, *et seq.*, in that the affirmative acts of harassment and discrimination committed by Individual Defendants occurred within the scope of their employment; allowing Defendants to control the day-to-day working environment; and/or the Corporate Defendant was deliberately indifferent, reckless, negligent and/or tacitly approved the hostile work environment; and/or Corporate Defendant failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training, and/or monitoring mechanisms for same despite the foreseeability of harassment and discrimination in the workplace; and/or by having actual knowledge of the harassment and discrimination of Plaintiffs and failing to promptly and effectively act to stop it.

105. Corporate Defendant aided, abetted, incited, compelled, and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce Individual Defendants to commit acts and

omissions that were in violation of the NJLAD by committing affirmatively discriminatory and harassing acts towards Plaintiffs in violation of its supervisory duties to halt or prevent harassment, subjecting Corporate Defendant to liability to Plaintiff pursuant to N.J.S.A. 10:5-12(e).

106. Individual Defendants aided, abetted, incited, compelled, and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce Corporate Defendant and/or other Individual Defendants to commit acts and omissions that were in violation of the NJLAD by committing affirmatively discriminatory and harassing acts towards Plaintiffs in violation of its supervisory duties to halt or prevent harassment, subjecting Corporate Defendant to liability to Plaintiffs pursuant to N.J.S.A. 10:5-12(e).

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

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

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

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

COUNT TWO
NJLAD – RETALIATION

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

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

110. Defendants took retaliatory action against Plaintiffs by, among other things, failing to renew Plaintiffs' employment contracts, effectively terminating their employment.

111. Defendants had knowledge of Plaintiffs' complaints and/or objections. As a result, Defendants took retaliatory action against Plaintiffs. Defendants' retaliatory action included but is not limited to terminating Plaintiffs' employment.

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

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

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

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

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

DEMAND FOR INSURANCE COVERAGE

Pursuant to Rule 4:10-2(b), demand is made that Defendants disclose to Plaintiffs' attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of the judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide 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

Plaintiffs demand a trial by jury on all issues.

McOmber McOmber & Luber, P.C.
*Attorneys for Plaintiffs, Karla Despinis and
 Richard Anthony Rienzo*

By: /s/ Matthew A. Luber

Dated: November 21, 2025

DESIGNATION OF TRIAL COUNSEL

Pursuant to *Rule* 4:25-4, MATTHEW A. LUBER, ESQUIRE is hereby designated as trial counsel for Plaintiffs.

CERTIFICATION

Pursuant to *Rule* 4:5-1, it is hereby certified that, to the best of my knowledge, there are no other civil actions or arbitration proceedings 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 Plaintiffs, Karla Despinis and
Richard Anthony Rienzo*

By: /s/ Matthew A. Luber

Dated: November 21, 2025

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Attorneys for Plaintiffs, Karla Despinis and Richard Anthony Rienzo

KARLA DESPINIS AND RICHARD ANTHONY RIENZO, Plaintiffs, vs. THE LAWRENCEVILLE SCHOOL; SULLIVAN ANTHONY “TRIPP” WELBORNE III; EMILIE KOSOFF; KRISTEN OBERLIN; ABC COMPANIES 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names of presently unidentified individuals), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MERCER COUNTY DOCKET NO.: <u>Civil Action</u>
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FIRST SET OF DOCUMENT REQUESTS, INTERROGATORIES, PUNITIVE DAMAGES REQUESTS, AND DEPOSITION NOTICES TO DEFENDANT(S)

PLEASE TAKE NOTICE that, McOmber McOmber & Luber, P.C., attorneys for Plaintiffs, Karla Despinis (“Plaintiff Despinis”) and Richard Anthony Rienzo (“Plaintiff Rienzo”) (collectively, “Plaintiffs”), demand that Defendants, The Lawrenceville School (“Defendant Lawrenceville” and/or “Corporate Defendant”), Sullivan Anthony “Tripp” Welborne III (“Defendant Welborne”), Emilie Kosoff (“Defendant Kosoff”), and Kristen Oberlin (“Defendant Oberlin”) (collectively, “Individual Defendants”) (together with Corporate Defendant, “Defendants”), produce true and complete copies of Documents responsive to the following

Document Requests and answer under oath the following Interrogatories pursuant to the New Jersey Rules of Court.

DEFINITIONS

1. The term “Plaintiff(s)” 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. The term “Plaintiff Despinis” shall mean Karla Despinis, Plaintiff in the above-captioned action.

3. The term “Plaintiff Rienzo” shall mean Richard Anthony Rienzo, Plaintiff in the above-captioned action.

4. The phrase “Defendant Lawrenceville” shall mean The Lawrenceville School 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.

5. The phrase “Defendant Welborne” shall mean Sullivan Anthony “Tripp” Welborne III, Defendant in the above-captioned action.

6. The phrase “Defendant Kosoff” shall mean Emilie Kosoff, Defendant in the above-captioned action.

7. The phrase “Defendant Oberlin” shall mean Kristen Oberlin, Defendant in the above-captioned action.

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

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

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

11. The terms “You,” “Your,” or “Yours” shall mean the party answering these interrogatory questions.

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

13. The term “Person” shall mean any natural Person, partnership, corporation, or other business Entity and all present and former officers, directors, agents, employees, attorneys and others acting or purporting to act on behalf of such natural Person, partnership, corporation or other business Entity.

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

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

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

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

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

19. The terms “Document” and “Documents” are defined in accordance with R. 4:18-1 and Includes the original and all drafts 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, schedules, lists, letter (sent or received), telephone Messages (Including but not limited to reports of telephone conversations and conferences), transcripts of telephone conversations and any other retrievable data, magazines, booklets, circulars, bulletins, questionnaires, assignments, orders, checks, vouchers, notebooks, acknowledgments, instructions, records, stories, index, disc, data sheet or data processing card, notes, minutes, records, photographs, computer programs, correspondence, telegraphs, telegrams, diaries, bookkeeping entries, specifications, source code, object code, flow charts, financial statements, charts, studies, reports, tables, analyses, graphs, statements, notebooks, handwritten notes, application, feasibility studies, papers, books, pamphlets, periodicals, appointment calendars, calendar entries, diary entries, 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, bills of lading, work papers, or any other written, recorded, transcribed, punched, taped, filmed,

photographed, videotaped or graphic matter, however produced or reproduced, and also Including, but not limited to, originals and all copies which are different from the original, whether by interlineation, receipt stamp, notation, indication of copy sent or received, or otherwise, and drafts, which are in the possession, custody or control of the present or former agents, representatives, employees, or attorneys of Defendant(s), or all Persons acting on Defendant(s)' behalf, Including Documents at any time in the possession, custody or control of such Individuals or entities who are known by Defendant(s) to exist. Include any catalog, brochure, or any other data compilations from which information can be obtained and translated if necessary, or any other written, recorded, stored, transcribed, punched, taped, filed or graphic matter however produced or reproduced, to which Defendant(s) have or have had access.

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

21. The term "Message" shall mean text messages, short messaging service (SMS), multimedia messaging service (MMS), iMessages, instant messages (IM) platforms (such as Telegram, Skype, Zoom, Facebook Messenger, Instagram Messenger, LinkedIn, Google Meet/Chat, Discord, Signal, Slack, WhatsApp, Teams, Salesforce Chatter, and other intranet Message platforms.

22. The terms "All" and "Any" shall both be construed as "any and all."

23. 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 Document and other material that might otherwise be construed to be outside the request.

24. 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.

25. The phrases “Relating to,” “Relate to,” “Relates to,” “Refer to,” “Refers to,” “referred,” “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.

26. The terms “Including” and “Include” shall mean “Including without limitation.”

27. The “Relevant Time Period” is January 2005 through the present.

INSTRUCTIONS

1. In addition to the specific instructions contained herein, these 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. Interrogatory answers shall be typed beneath the questions and the original shall be returned in accordance with R. 4:17-4(c).

4. 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 R. 4:17-7.

5. 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.

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

7. 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.

8. If You cannot respond to any of these Document Requests and 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.

9. When a Document Request or Interrogatory asks for You to identify a date, state the exact day, month, and year, if ascertainable or, if not, the best approximation thereof.

10. Document 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.

11. 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.

12. 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.

13. Production of entire Document. For each Discovery Request to which Defendant(s) are producing Documents, Defendant(s) shall identify in its written response the Bates range of Documents produced which are responsive to that request.

14. 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(s) to use such information.

15. In the event that any oral Communication, statement, 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; (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. Whenever a claim of privilege concerns any oral Communication or statement, identify the participants to the Communication and the Person giving and receiving the statement, and set forth the date and place of the Communication or statement and state the general subject matter thereof and state the basis for the claim of privilege.

16. 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, the reason for destruction or discard, the Person(s) who authorized 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.

17. 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 or Interrogatory for which no objection or claim of privilege is made.

18. If a refusal to answer a Document Request or Interrogatory is based on the ground that the request is overly burdensome, identify the number and nature of Documents that need to be searched.

19. The Punitive Damages 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 Chem.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." *McDonough v. Jorda*, 214 N.J. Super. 338, 349 (App. Div. 1986) (citing Restatement (Second) of Torts 908 cmt. d (1977)), *certif. denied*, 110 N.J. 302 (1988) *cert. denied*, 489 U.S. 1065 (1989).

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

Document Requests

DOCUMENT REQUESTS*(Directed to All Defendants)*

1. Any and all text messages between Defendant Welborne and Nicole Stock from January 2021 through the present.
2. Any and all Statements, Documents, or Communications pertaining to Defendant Welborne's creation of the Director of Athletics role at Defendant Lawrenceville in or around May 2023.
3. The complete applications of any and all Persons who applied to the Director of Athletics role at Defendant Lawrenceville between May 2023 and February 2024.
4. Any and all Statements, Documents, and Communications pertaining to the selection of Nicole Stock as Director of Athletics at Defendant Lawrenceville, including but not limited to meeting notes/minutes regarding the discussion of Nicole Stock's promotion.
5. All meeting notes/minutes taken by Defendants during meetings with Plaintiffs, including but not limited to notes taken on February 18, 2022; February 22, 2023; and September 12, 2023; February 17, 2025; February 18, 2025; March 24, 2025; and March 25, 2025.
6. Any and all Statements, Documents, and Communications pertaining to Defendant Welborne's purchase of a John Deere ATV between 2023 and 2024, including but not limited to a photo of the license plate Nicole Stock placed on the ATV.
7. Any and all Statements, Documents, and Communications pertaining to or memorializing department-wide meetings of Defendant Lawrenceville's Athletic Department from 2015 to the present.
8. Any and all Statements, Documents, and Communications pertaining to or memorializing 1:1 meetings between Plaintiff(s) and Defendant Welborne from 2015 to the present.

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9. Any and all Statements, Documents, and Communications pertaining to or memorializing Defendant Lawrenceville's decision to purchase and/or adopt a bulldog puppy as a mascot.

10. Any and all Statements, Documents, and Communications pertaining to or memorializing Defendant Welborne's and Nicole Stock creation and purchase of custom matching clothing with Defendant Lawrenceville's mascot on it, including but not limited to photos of each article of clothing purchased.

11. Any and all Statements, Documents, and Communications pertaining to or memorializing complaints by faculty or staff of Defendant Lawrenceville regarding Defendant Welborne, Nicole Stock, and/or Defendant Welborne and Nicole Stock's relationship.

12. Any and 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.

Personnel Files

13. A complete copy of the personnel file Defendant(s) maintained pertaining to Plaintiffs, Including but not limited to copies of Documents Relating to the following: (a) medical records and reports; (b) pay and benefits provided to Plaintiffs; (c) attendance, sick time, disability time, personal time and/or vacation time; (d) commendations and/or performance reviews regarding Plaintiffs; (e) job title or job status changes; (f) Documents Relating to any leave of absence; and (g) employer policy information provided to Plaintiffs, if any.

14. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any and all Individual Defendant(s), 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

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Defendant; (b) performance evaluations that were conducted for any Individual Defendant; (c) job title or job status changes for any Individual Defendant; and any and all complaints or concerns raised by any Defendant Lawrenceville employee regarding the Individual Defendant, including but not limited to Plaintiffs' complaints.

15. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any and all Individual Defendant(s), 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; (c) job title or job status changes for any Individual Defendant; and any and all complaints or concerns raised by any Defendant Lawrenceville employee regarding the Individual Defendant, including but not limited to Plaintiffs' complaints.

16. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to Nicole Stock, 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 Nicole Stock; (b) performance evaluations that were conducted for Nicole Stock; (c) job title or job status changes for Nicole Stock; and any and all complaints or concerns raised by any Defendant Lawrenceville employee regarding Nicole Stock, including but not limited to Plaintiffs' complaints.

Plaintiff's Hiring & Employment

17. Any and all Documents that Relate to, refer to, discuss, or memorialize Plaintiffs' hiring.

18. Any and all Documents (Including the job application) that Plaintiffs completed in

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connection with their seeking or application of employment at Corporate Defendant(s).

19. Any and all statements, Documents, or Communications Related to the policies, procedures, or Documents reviewed with or provided to Plaintiffs during Plaintiffs' onboarding with Corporate Defendant(s).

20. Any and all policies, practices, procedures that Plaintiffs were required to comply with while employed by Corporate Defendant(s).

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

22. Produce a copy of any and all Personnel manuals in force and effect at the time of the Plaintiffs' employment with Defendant(s).

23. Any and all Documents Relating to any and all employee benefits or benefit plan in which Plaintiffs were eligible to participate during his/her employment with Defendant(s), including but not limited to tuition and retirement benefits.

24. Produce Documents Related to Plaintiffs' compensation Including, paystubs, timesheets, and earning statements.

25. Any and all statements, Documents, or Communications Concerning any agreement or contract between the Plaintiffs and Defendant(s).

26. Any and all statements, Documents, or Communications Relating to Plaintiffs' performance.

27. Any and all statements, Documents, or Communications Concerning any occasion in which Defendant(s) reprimanded or disciplined Plaintiffs.

28. Any and all Documents and Electronic Data that Relate to, refer to, discuss, or memorialize any alleged adverse employment action against Plaintiffs (e.g., the termination, non-

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renewal, PIP of Plaintiffs).

Job Description & History

29. A written job description for each and every position that Plaintiffs held during their employment with Corporate Defendant(s).

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

31. A written job description for each and every position held by Nicole Stock or any employee or agent of Defendant(s) during her tenure of employment with Corporate Defendant(s).

Policies & Procedures

32. Produce a copy of Defendant(s)' policies, practices, and/or procedures Concerning discrimination, harassment, and retaliation during the Relevant Time Period.

Training

33. Any and all statements, Documents, or Communications Relating to anti-harassment, anti-discrimination, and/or anti-retaliation training or education completed by Defendant(s) during the Relevant Time Period.

34. Any and all statements, Documents, or Communications Concerning Defendant(s) receiving any sensitivity training or any training regarding appropriate workplace conduct during the Relevant Time Period.

Statement & Witnesses

35. Any and all statements, Documents, or Communications Concerning or made by any Person that Relate to the allegations asserted in the Complaint.

36. Any and all statements, Documents, or Communications Relating to statements of

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witnesses provided to and/or obtained by Defendant(s) that Relate to this Action.

37. Any and 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.

38. Any and all statements, Documents, or Communications Concerning any and all of Defendant(s) denials of the allegations set forth in the Complaint.

39. Any and all statements, Documents, or Communications Concerning any Person who has knowledge and/or information Relating to this Action.

40. Any and all statements, Documents, or Communications between the Plaintiff and Defendant(s) that Relate to this Action.

41. Any and all statements, Documents, or Communications Concerning any and all admissions by or of Defendant(s) that Relate to this Action.

Trial & Experts

42. 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.

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

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

45. 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 on to support its defenses, Including using as an exhibit at trial.

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Internal Complaints & Investigation

46. Any and all statements, Documents, or Communications Relating to any complaints, protected conduct, and/or Grievances made by the Plaintiff regarding Defendants.

47. Any and all statements, Documents, or Communications Concerning any Investigation that Relates (i) to the claims and defenses asserted in this Action, (ii) to Plaintiffs, and/or (iii) to Defendants. This Includes all statements, Documents, or Communications Concerning any Investigation Concerning discrimination, harassment, hostile work environment, retaliation, or any conduct pertaining to Plaintiffs' alleged NJLAD claims.

48. Any and all reports (Including drafts) Relating to any Investigations or Grievances Concerning Defendant(s), Nicole Stock, and/or the Plaintiffs.

Other Litigation

49. Any and all Documents concern Concerning any and all internal complaints, lawsuits, and Grievances at Corporate Defendants the past ten (10) years Concerning discrimination, retaliation, or alleged violation of federal law, state law, or NJLAD.

50. Any and all Documents Concerning any lawsuits, claims, charges, arbitrations, and/or proceedings – previously or currently before state court, federal court, administrative agency, U.S. Equal Employment Opportunity Commission, the NJ Department of Labor, civil rights agency, commission, board, or department – against Defendant(s) for the past ten (10) years Concerning discrimination, retaliation, or alleged violation of federal law, state law, or NJLAD.

Communication

51. Produce any and all photographs, videos, or recordings that Relate to this matter.

52. Produce a copy of any and all Messages and Communication between Defendant(s) and Plaintiffs.

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53. Produce a copy of any and all Messages and Communication between or among Individual Defendants that concern or Relate to Plaintiff.

54. Produce a copy of any and all Messages and Communication between Defendant(s) and Defendant(s)' agents, servants or representatives referring and/or Relating to the subject matter of this litigation.

55. Any and all statements, Documents, or Communications Concerning any and all Communication between Defendant(s) and Defendant(s)' Human Resources department(s) regarding Plaintiffs.

56. Any and all Documents or logs relating to phone calls between the Plaintiffs and Defendants, Including cell phones, traditional phones, and softphones.

57. Any and all Documents or logs relating to phone calls between the Nicole Stock and Defendant Welborne, Including cell phones, traditional phones, and softphones.

58. Any and all statements, Documents, or Communications Concerning teleconference and videoconference (such as Zoom and Teams) that Related to this matter.

Other

59. Any and all Documents identified or referenced in Defendant(s)' Answers to Plaintiff's First Set of Interrogatories to Defendant(s).

Notices

60. Produce any and all notices, posters, bulletins, or other Documents Defendant(s) displayed in the workplace regarding federal, state, and local employment laws during the Relevant Time Period.

Data Preservation

61. Any and all Documents Relating to Corporate Defendant(s)' policies, practices,

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and/or procedures Concerning Electronic Data retention and preservation.

Job Comparators & Replacement

62. Any and all Documents Relating to any Person who assumed Plaintiffs' position, or who assumed or performed Plaintiff's roles/duties/responsibilities, Including that individual's contract, offer letter, and Personnel file.

63. Any and all Documents Relating to any Person who was hired as a part-time strength and conditioning coach following Plaintiff Rienzo's termination, Including that individual's contract, offer letter, and Personnel file.

64. Produce portions of the Personnel file(s) Defendant(s) maintained pertaining to any and all of Plaintiffs' "job comparators" during Plaintiff's employment, 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 said employees; (b) performance evaluations that were conducted for any said employees; (c) pay records maintained for said employees; and (d) job title or job status changes for any said employees.

65. Produce job descriptions for each and every position held by any and all "job comparators" of the Plaintiffs during his/her tenure of employment with Corporate Defendant(s).

66. Any and all Documents Relating to job or positions vacancies/postings/openings/opportunities where Defendant(s) sought to hire an individual or promote an employee within (3) months preceding and succeeding Plaintiffs' termination.

Corporate Structure

67. Produce Documents Relating to Corporate Defendants' organizational chart or management hierarchy.

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Unemployment

68. Any and all Documents to or from the State of New Jersey Related to Plaintiffs' claim for unemployment benefits.

69. All and all statements, Documents, or Communication Related to Plaintiffs' claim for unemployment benefits.

Interrogatories

INTERROGATORIES*(Directed to All Defendants)*

1. Identify each and every individual who was involved in the decision to create a Director of Athletics role at Defendant Lawrenceville in 2023 and describe each individual's role and input in the decision.

2. Identify each and every individual who was involved in the decision to hire Nicole Stock as Director of Athletics and describe each individual's role and input in the decision.

3. Identify each and every individual who was involved in the decision to purchase a John Deere ATV between 2023 and 2024 and describe each individual's role and input in the decision.

4. Identify each and every individual who was involved in the decision to purchase/adopt a bulldog puppy as Defendant Lawrenceville's mascot and describe each individual's role and input in the decision.

5. Identify each and every Defendant Lawrenceville faculty member whose contract was non-renewed for the 2025-2026 school year. For each such Person, state:

- a. Full name;
- b. Job title;
- c. Date of hire;
- d. Department;
- e. Whether the Person had exhibited poor performance; and
- f. Identify who made the decision to non-renew the Person.

6. Identify each and every time Plaintiffs complained about or discussed Defendant Welborne's conduct. For each such instance, state:

- a. the date of the complaint/conversation;
- b. the Persons who participated in the conversation;
- c. the Persons who were informed of the conversation; and
- d. a detailed description of the conversation.

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7. Identify each and every time a staff or faculty member of Defendant Lawrenceville complained about or discussed Defendant Welborne's conduct. For each such instance, state:

- a. the date of the complaint/conversation;
- b. the Persons who participated in the conversation;
- c. the Persons who were informed of the conversation; and
- d. a detailed description of the conversation.

8. Identify each and every time a staff or faculty member of Defendant Lawrenceville complained about or discussed Nicole Stock's conduct and/or relationship with Defendant Welborne. For each such instance, state:

- a. the date of the complaint/conversation;
- b. the Persons who participated in the conversation;
- c. the Persons who were informed of the conversation; and
- d. a detailed description of the conversation.

Insurance

9. 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 R. 4:10-2(b).

10. State the policy limits of any and all 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.

Termination

11. State with specificity each and every legitimate, non-discriminatory and/or non-retaliatory reason for why Defendants subjected Plaintiffs to adverse employment action (e.g., termination, non-renewal, PIP), during Plaintiffs' employment and the factual basis for the same. Attach any and all Documents Related to Plaintiff's termination or that discuss Plaintiffs'

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termination.

12. Identify each and every individual who was involved in the decision to take adverse employment action (e.g., termination, non-renewal, PIP) against Plaintiffs and describe each individual's role and input in the decision.

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

Employment

14. State whether there are any forms required to be filled out by an applicant for original hire, promotion, transfer, or other change in terms and conditions of employment, and, if so, state:

- a. the name and identifying number of each form;
- b. the purpose of each form;
- c. and produce the form.

15. State whether there was any collective bargaining agreement in effect during the period referred to in the complaint providing for any connection with, authority over, or direct or indirect effect or control over any hiring practices or procedures of Corporate Defendant(s).

16. With respect to Plaintiffs, state the following:

- a. the original date of hire;
- b. the gross earnings or compensation for each year of employment since the original date of hire to the present;
- c. all fringe benefits payable to the plaintiffs at time of discharge, including pension, welfare, health, retirement, tuition, savings, deferred compensation, bonus and/or profit sharing plans; and
- d. if the benefit plans have changed since the time of discharge, detail all the changes.

17. State identified the employee compensation and benefits that the Corporate Defendant(s) offered to Plaintiffs, including, but not limited to, the following, and describe in

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detail:

- a. hourly or salary wage;
- b. any compensation;
- c. overtime;
- d. stock options;
- e. sabbaticals;
- f. sick leave;
- g. disability leave;
- h. vacation leave;
- i. Christmas/holiday bonuses;
- j. other bonuses;
- k. health insurance;
- l. life insurance;
- m. maternity leave;
- n. child-rearing leave;
- o. other leaves of absence;
- p. tuition benefits;
- q. pensions and retirement benefits;
- r. education leave; and
- s. contribution toward educational expenses.

18. List chronologically each and every job title held by the Plaintiffs while employed by any Defendant(s) indicating the time period during which each position was held.

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

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

21. State whether the Plaintiffs 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;

Interrogatories

- e. the criteria used in making the decision; and
- f. identify all Documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

22. State whether the Plaintiffs 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.

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

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

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

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

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

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27. State whether Individual 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.

28. State the full name of each and every manager that worked with or oversaw the Plaintiff during the course of Plaintiffs' employment, and Include dates that each and every manager oversaw Plaintiffs.

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

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

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

32. State whether Nicole Stock 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

Interrogatories

- f. identify all Documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

33. State whether Nicole Stock 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.

Procedures & Policies

34. Identify and describe in full detail Defendant(s)' policy Relating to an employee's complaint of discrimination, inappropriate workplace relationships, and/or retaliation.

35. Identify and describe in detail Defendant(s)' policies, practices, and/or procedures for reprimanding, suspending, non-renewing and/or terminating employees.

36. 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.

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

38. Identify and describe the facts and details Relating to each instance in which any of the Defendant(s) were reprimanded or disciplined during the course of their employment.

39. Describe, in full detail, the facts and circumstances Relating to any change in Plaintiffs' position and/or job responsibilities.

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

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Investigation

41. 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.

42. 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.

Grievances

43. Please describe in detail complaints or Grievances (formal or otherwise) made by the Plaintiff with regard to discrimination, inappropriate workplace relationships, and/or retaliation regarding Defendant(s).

44. Describe, in detail, all complaints or Grievances (formal or otherwise) by any employees of Defendant(s) Relating to discrimination, inappropriate workplace relationships, and/or retaliation regarding Defendant(s) in the past ten (10) years.

45. Describe, in detail, the Investigation, determination and/or disciplinary Actions taken by Defendant(s) Relating to all complaints or Grievances of discrimination, inappropriate workplace relationships, and/or retaliation regarding by Defendant(s) in the past ten (10) years.

46. 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

Interrogatories

Departments (or similar departments) at Defendant(s).

HR & Training

47. Identify any and all Persons employed by Defendant(s) who are responsible for Human Resources, Personnel matter, training, orientation, and Personnel monitoring for the previous five (5) years to the present to the best of Defendant(s)' knowledge, and provide the dates of employment for each.

48. Provide the name, last known address, last known job title, and last known telephone number of each and every Equal Employment Opportunity officer employed by Corporate Defendant(s) or the previous five (5) years to the present, and for each, state the dates of employment of each EEO officer.

49. 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.

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

51. In connection with Defendant(s)' response to the preceding Interrogatory, provide full details of such training Including the dates, and provide any and all 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.

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

53. Does Corporate Defendant maintain records and post employment notices as required by federal, state, or local employment laws, and the regulations adopted pursuant thereto, and, if so, identify the records and notices and describe in detail how compliance has taken place and particularly describe the compliance in the last five (5) years to the present.

54. State whether the Corporate Defendant(s) has received any notices, posters, bulletins, or other Documents from the Equal Employment Opportunity Commission or the New Jersey Department of Labor with instructions to post them in conspicuous places on the premises, and, if so, state where and when the notices, posters, bulletins or Documents were posted, and if they are posted at the present time, state where and when the notices, posters, bulletins or Documents are posted.

Other Cases

55. State whether any lawsuits, claims, charges, arbitrations, and/or proceedings – Including with state court, federal court, administrative agency, U.S. Equal Employment Opportunity Commission, the NJ Department of Labor, civil rights agency, commission, board, or department – has been filed/charged/sought against Defendant(s) alleging discrimination, and/or retaliation in the past ten (10) years. 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;

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- 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.

56. Set forth in detail, to Your knowledge, any and 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.

57. Describe, in detail, any and all 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 any and all Documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

Statement & Admissions

58. 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.

Communication

59. 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, including but not limited to Nicole Stock. For any and 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

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present. For any and all such Communications that were written, provide true and accurate copies of each such Communication.

60. State whether at any time, Defendant(s) ever taped and/or digitally recorded any Communication with the Plaintiffs, 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.

Trial & Experts

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

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

63. With respect to each and every 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);

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- 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.

64. With respect to each and every 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.

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

- a. state the subject matter on which he/she was consulted;
- b. state his/her field of expertise;
- c. set forth the full and detailed qualifications, training, professional and practical experience, education and degree obtained by such Person. (As to each item listed in the answer to this Interrogatory, set forth the dates and/or years of same, as well as the names and addresses of each institution attended; furthermore, set forth the nature of each place at which experience or training was received);
- d. attach to the answers to these Interrogatories copies of all written reports submitted to You (or detailed resume if report was oral) of each such expert;
- e. state whether or not there are any other reports in existence from the particular experts named, either written or oral (if any such reports, either written or oral, subsequently become known to You, or become available, submit copies thereof of supplemental answers to these Interrogatories);
- f. set forth completely all expert opinions rendered by the named expert(s) which are not in writing;
- g. identify each Document that has been relied upon by each expert witness in the formulation of his or her opinion; and
- h. state a summary of the grounds for each opinion.

Data Retention

Interrogatories

66. 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.

67. 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.

68. Identify each and every 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) within the past 10 years, up to and Including the present;
- b. Computer software operating systems and end user-applications servicing Corporate Defendant(s) within the past 10 years, up to and Including the present;
- c. All email software and versions which have been used on hardware servicing Corporate Defendant(s) within the past 10 years, up to and Including 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 within the past 10 years, up to and Including 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.

Individual Defendant

69. Identify the last known address, email address, and telephone number for each and every Individual Defendant.

70. Identify each and every email account each Individual Defendant(s) utilized as an

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employee of Defendant(s) during the Relevant Time Period.

Damages

71. 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.

Legal & Other

72. State the name, last known address, and last known telephone number of any and all Persons who have knowledge of facts Relating in any way to this matter and specify the subject matter of each and every such Person's knowledge.

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

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

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

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

77. Are there any Documents that Defendant(s) know or believe to be in existence, although not in Defendant(s)' possession, custody, or control, that in any way Relate to the subject

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matter of this litigation? If so, identify each and every 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, custody, or control such Document is known or believed to be.

Jurisdictional

78. Identify each and every State in which Corporate Defendant(s) is incorporated and state the date of each incorporation.

79. Identify each and every State in which Corporate Defendant(s) conducts business operations and state the proportion of the Corporate Defendant(s) total business which is done within each State.

80. Identify and describe the business operations of Corporate Defendant(s) in the State of New Jersey during the Relevant Time Period, Including location, nature of operation, for whom work was performed, and pursuant to what contract or agreement.

81. Identify each and every facility maintained by Corporate Defendant(s) in the State of New Jersey and state with reference to each:

- a. the name of the facility;
- b. the address of the facility;
- c. the date the facility opened for operation;
- d. the nature of the work performed at the facility;
- e. the name and title of the officer in charge of each facility; and
- f. the name and title of the individual in charge of employee Relations at each facility.

82. Is there an organization chart for the defendant, and, if so state the name and address of the custodian of the chart.

Post Termination

83. Identify each and every individual who replaced the Plaintiffs' job or performed any of Plaintiffs' job duties, set forth:

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- g. the name, address and qualifications of the employee; and
- h. all dates of employment.

84. Identify each and every medium – Including newspaper, employment agency, online websites, and job boards – which Corporate Defendant uses to advertise available jobs during the Relevant Time Period and within one year following Plaintiff's termination.

Interrogatories to Individual Defendants

INTERROGATORIES TO INDIVIDUAL DEFENDANT(S)***(Directed to Individual Defendants)***

1. Identify each and every 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. For each and every such Document or tangible thing upon which Individual Defendant(s) will rely in support of Individual Defendant(s)'s claims/defenses/affirmative defenses state:

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

2. Identify any and all email addresses You have during the past five (5) years.

3. Identify any and all cell phone numbers You have used during the past five years as and identify the carrier and current location of each and every cell phone. For any cell phone that is no longer in Your possession, identify the name and address of the Person's whose possession, custody, or control they are in.

4. Have You ever been convicted of a criminal offense? If so, for each and every conviction, identify and set forth in detail:

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

Interrogatories to Individual Defendants

5. State whether You are a supervisor. If so, (1) state all of Your supervisory responsibilities; (2) identify which department and which employees You supervise in any capacity; (3) identify employees who You directly supervise; and (4) state whether You supervised Plaintiff and in what capacity.

Punitive Damages Document Requests

PUNITIVE DAMAGES DOCUMENT REQUESTS*(Directed to Corporate Defendants)*

1. Any and all financial statements prepared for the prior 10 years, up to and Including the present, setting forth income, expenses, assets, liabilities, and profits of the Corporate Defendant(s).
2. Any and all tax returns filed by the Corporate Defendant(s) for each of the last ten (10) tax years.
3. Any and all Documents evidencing assets of the Corporate Defendant(s).
4. Any and all Documents evidencing the Corporate Defendant(s)' interest in any real estate.
5. Any and all Documents evidencing the financial obligations of the Corporate Defendant(s).
6. Any and all Documents evidencing any judgment against the Corporate Defendant(s) during the past ten (10) years and the amount of such judgment(s).
7. Any and all Documents evidencing bank accounts held by the Corporate Defendant(s) during the past ten (10) years, the location of those accounts, account numbers, and balances of those accounts.
8. Any and all Documents evidencing or setting forth accounts receivable and/or obligations owed by others to the Corporate Defendant(s) during the past ten (10) years.
9. Any and all Documents evidencing payments made by the Corporate Defendant(s) to creditors during the past ten (10) years.
10. Any and all corporate books or any other written memorandum setting forth income received by the Corporate Defendant(s) during the past ten (10) years.

Punitive Damages Document Requests

11. Any and all inventories taken by the Corporate Defendant(s) of its property at any time during the past ten (10) years.

Punitive Damages Interrogatories

INTERROGATORIES RELATED TO PUNITIVE DAMAGES***(Directed to Corporate Defendants)***

1. For each and every Corporate Defendant, set forth:
 - a. The full name of the Corporate Defendant;
 - b. The date of formation;
 - c. The state of formation;
 - d. All states in which the Corporate Defendant conducts its business;
 - e. All states in which the Corporate Defendants has registered to do business;
 - f. The full name and residential address of any Person who has been a shareholder, member, or partner of Corporate Defendant during any part of the last two years;

2. For each and every Person identified in response to subsection (f) above, state the Person's ownership interest in Corporate Defendant;
 - a. The full name and residential address of any Person who has served as a director of Corporate Defendant during any part of the last two years, along with the specific period during which such Person served as director;
 - b. The full name and addresses of all any Person who served as an officer of the corporation during any part of the past two years, along with the title and specific period during which such Person served as an officer;
 - c. All trade or fictitious names under which Corporate Defendant has conducted business during any part of the past two years;
 - d. The complete street address of all locations where Corporate Defendant has conducted its business during any part of the past two years, along with the specific period during which it conducted such business at each location; and
 - e. The full name and address of the Person who has custody of this corporation's books and records.

3. Is a majority of the ownership interest in Corporate Defendant held by any single individual or Entity? If so, state for the individual or Entity:
 - a. The full name and address;
 - b. The state of formation, if applicable;
 - c. The state(s) in which such individual or Entity does business;
 - d. The 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 such individual or Entity is engaged.

4. For all real property owned by Corporate Defendant(s), state:

Punitive Damages Interrogatories

- a. The physical address (the "Location");
- b. The nature of the business conducted at the Location;
- c. The dates during which Corporate Defendant has owned the Location; and
- d. The number of individuals presently employed at the Location.

5. State the name, address, and telephone number of each and every Entity in which any individual identified in response to Interrogatory Related to Punitive Damage No. 1(f) now has an interest and set forth the nature of such interest.

6. For each and every bank account of Corporate Defendant, list the name of the bank, the bank's address, the account number, and the name in which the account is held.

7. State the present location of any and all books and records of Corporate Defendant(s), Including financial records.

8. State the name and address of each and every Person/Entity who/that prepares, maintains, and/or controls the business records and checkbooks of Corporate Defendant.

9. List each and every physical asset of Corporate Defendant. For each and every physical asset identified, state the location of the physical asset and, if such asset is subject to a lien, state the amount of the lien and the name and address of the lienholder.

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

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

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

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

Punitive Damages Interrogatories

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

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

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

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

15. Set forth any and 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 Plaintiffs, Karla Despinis and Richard
Anthony Rienzo*

By: /s/ Matthew A. Luber

Dated: November 21, 2025

CERTIFICATION

I hereby certify (or aver) 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 (or aver) 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: _____

By: _____

CERTIFICATION

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: _____

By: _____

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Attorneys for Plaintiffs, Karla Despinis and Richard Anthony Rienzo

KARLA DESPINIS AND RICHARD ANTHONY RIENZO, Plaintiffs, vs. THE LAWRENCEVILLE SCHOOL; SULLIVAN ANTHONY “TRIPP” WELBORNE III; EMILIE KOSOFF; KRISTEN OBERLIN; ABC COMPANIES 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names of presently unidentified individuals), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MERCER COUNTY DOCKET NO.: <u>Civil Action</u>
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NOTICE OF R. 4:14-2(c) VIDEO DEPOSITION OF CORPORATE DEFENDANT(S)

PLEASE TAKE NOTICE that pursuant to Rule 4:14-2(c) of the New Jersey Rules of Court, Plaintiffs, Karla Despinis and Richard Anthony Rienzo, through their undersigned counsel, will take the deposition upon oral examination of the corporate representative of Corporate Defendants(s) **commencing on May 4, 2025, at 10:00 AM**, at the law offices of McOmber McOmber & Lubber, P.C. Corporate Defendant(s) is required to designate and produce for deposition a person or persons to testify on its behalf.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or by

videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, Karla Despinis and Richard
Anthony Rienzo*

By: /s/ Matthew A. Luber

Dated: November 21, 2025

Matthew A. Luber, Esq. – NJ ID # 017302010
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Attorneys for Plaintiffs, Karla Despinis and Richard Anthony Rienzo

KARLA DESPINIS AND RICHARD ANTHONY RIENZO, Plaintiffs, vs. THE LAWRENCEVILLE SCHOOL; SULLIVAN ANTHONY “TRIPP” WELBORNE III; EMILIE KOSOFF; KRISTEN OBERLIN; ABC COMPANIES 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names of presently unidentified individuals), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MERCER COUNTY DOCKET NO.: <u>Civil Action</u>
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NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiffs, through their undersigned counsel, will take the deposition upon oral examination of Sullivan Anthony “Tripp” Welborne **commencing on May 5, 2025 at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

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

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, Karla Despinis and Richard
Anthony Rienzo*

By: /s/ Matthew A. Luber

Dated: November 21, 2025

Matthew A. Lubber, Esq. – NJ ID # 017302010
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Attorneys for Plaintiffs, Karla Despinis and Richard Anthony Rienzo

KARLA DESPINIS AND RICHARD ANTHONY RIENZO, Plaintiffs, vs. THE LAWRENCEVILLE SCHOOL; SULLIVAN ANTHONY “TRIPP” WELBORNE III; EMILIE KOSOFF; KRISTEN OBERLIN; ABC COMPANIES 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names of presently unidentified individuals), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MERCER COUNTY DOCKET NO.: <u>Civil Action</u>
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NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiffs, through their undersigned counsel, will take the deposition upon oral examination of Emilie Kosoff **commencing on May 6, 2025 at 10:00 AM**, at the law offices of McOmber McOmber & Lubber, P.C.

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

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, Karla Despinis and Richard
Anthony Rienzo*

By: /s/ Matthew A. Luber

Dated: November 21, 2025

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Attorneys for Plaintiffs, Karla Despinis and Richard Anthony Rienzo

KARLA DESPINIS AND RICHARD ANTHONY RIENZO, Plaintiffs, vs. THE LAWRENCEVILLE SCHOOL; SULLIVAN ANTHONY “TRIPP” WELBORNE III; EMILIE KOSOFF; KRISTEN OBERLIN; ABC COMPANIES 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names of presently unidentified individuals), Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MERCER COUNTY DOCKET NO.: <u>Civil Action</u>
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NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiffs, through their undersigned counsel, will take the deposition upon oral examination of Kristen Oberlin **commencing on May 7, 2025 at 10:00 AM**, at the law offices of McOmber McOmber & Lubber, P.C.

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

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, Karla Despinis and Richard
Anthony Rienzo*

By: /s/ Matthew A. Luber

Dated: November 21, 2025

Civil Case Information Statement

Case Details: MERCER | Civil Part Docket# L-002452-25

Case Caption: DESPINIS KARLA VS THE
LAWRENCEVILLE SC HOOL

Case Initiation Date: 11/21/2025

Attorney Name: MATTHEW ALLEN LUBER

Firm Name: MCOMBER MCOMBER & LUBER, PC

Address: 54 SHREWSBURY AVE

RED BANK NJ 07701

Phone: 7328426500

Name of Party: PLAINTIFF : Despinis, Karla

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: Karla Despinis? NO

Are sexual abuse claims alleged by: Anthony Rienzo? 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)

11/21/2025
Dated

/s/ MATTHEW ALLEN LUBER
Signed

