

Christian V. McOmber, Esq. – NJ ID #012292010
 cvm@njlegal.com
 Peter D. Valenzano, Esq. – NJ ID #037892010
 pdv@njlegal.com
 Anna F. Esposito, Esq. – NJ ID #409612022
 afe@njlegal.com
 McOMBER McOMBER & LUBER, P.C.
 54 Shrewsbury Avenue
 Red Bank, NJ 07701
 (732) 842-6500 Phone
Attorneys for Plaintiff, Justine Sacks

<p>JUSTINE SACKS,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; DAVID SCHUTZENHOFER; RAUL SICOE; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MONMOUTH COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p>COMPLAINT & DEMAND FOR TRIAL BY JURY; FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS</p>
--	--

Plaintiff Justine Sacks (“Plaintiff”), by way of Complaint against Defendant Lamington Farm Club, LLC d/b/a Trump National Golf Club, Bedminster (“Defendant Trump National”) Defendants ABC Corporations 1-5 (fictitious names describing presently unidentified business entities) (along with “Defendant Trump National,” collectively referred to as the “Trump Defendants” or “Corporate Defendants”), David Schutzenhofer (“Defendant Schutzenhofer”), Raul Sicoe (“Defendant Sicoe”) and John Does 1-5 (fictitious names describing presently unidentified individuals) (along with “Defendant Schutzenhofer” and “Defendant Sicoe,” collectively referred to as the “Individual Defendants”), alleges as follows:

PRELIMINARY STATEMENT

Plaintiff Justine Sacks brings this civil action under New Jersey’s Conscientious Employee Protection Act, N.J.S.A. 34:19-1, et seq. (hereinafter referred to as “CEPA”) and the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, et seq. (hereinafter referred to as the “NJLAD”) after being subjected to entrenched gender discrimination, pervasive sexual harassment, and relentless retaliation at Defendant Trump National. This case tells a familiar story with a stubborn twist. A woman in leadership spoke up, enforced the rules, and paid the price. By way of background, Plaintiff was hired as Clubhouse Manager in January 2023. From day one, she entered a workplace where women were not meant to lead. Senior male management, including the General Manager and Assistant General Manager, demeaned her, sidelined her, and treated her authority as optional. She was excluded from meetings, stripped of responsibilities, subjected to sexist slurs and stereotypes, and ultimately demoted and fired.

At the same time, Plaintiff did her job. She reported serious health and safety violations and refused to look the other way. Employees drank on duty. Food was served expired and contaminated. Kitchens lacked running water and handwashing stations. Health codes were ignored. Training was nonexistent. Inspections were failed. Plaintiff spoke up anyway. Management did not thank her. They labeled her “too by the book,” “wrapped too tight,” and a poor “cultural fit.” She was told to stop encouraging women to report discrimination to Human Resources (“HR”). Her duties were handed to male managers. She was shut out of meetings, communications, and professional opportunities routinely given to men.

The culture was openly hostile to women. Management admitted certain leaders had an “issue with women” and preferred “old school” gender roles. Female employees endured sexual comments, sexist remarks about their bodies and menstruation, and retaliation for speaking up. Plaintiff was called “Honey,” told not to “get smart,” warned not to cry or raise her voice, and

advised to abandon her “malice lens.” Male staff were instructed not to take orders from her. One senior manager would not look at her, speak to her, or even shake her hand.

After more than two years of escalating discrimination and retaliation, Defendants imposed a sham Performance Improvement Plan (“PIP”) shortly after Plaintiff renewed complaints to corporate counsel and senior HR. She was then demoted under the pretense of an “opportunity” and terminated on May 9, 2025. Her firing came days after Corporate Defendants failed a New Jersey Department of Health (“DOH”) inspection for the very violations she had long reported. This was not about performance. It was about silencing a woman in leadership who refused to accept discrimination, endure harassment, or ignore unlawful and unsafe practices. Defendants violated the NJLAD and CEPA by fostering a hostile work environment, discriminating on the basis of gender, and retaliating against a whistleblower who would not stay quiet.

Fortunately, the NJLAD and CEPA provide redress for employees like Plaintiff subjected to such egregiously unlawful treatment in the workplace. Accordingly, Plaintiff brings this lawsuit to expose Defendants’ conduct and to seek redress for the discrimination and retaliation she faced while employed.

PARTIES

1. Plaintiff is a domiciliary of the State of New Jersey currently residing in Bridgewater, New Jersey. At all times relevant hereto, Plaintiff was employed by Defendant Trump National as Clubhouse Manager.

2. Defendant Trump National is a foreign limited liability company located in Bedminster, New Jersey. At all times relevant hereto, Defendant Trump National is an “employer” as defined by the NJLAD and CEPA and directly employed Plaintiff and the Individual Defendants.

3. Defendant Schutzenhofer, at all times relevant hereto, is a domiciliary of the State of New Jersey and General Manager of Defendant Trump National. This claim is brought against Defendant Schutzenhofer in his individual capacity and as an agent of Defendant Trump National who aided and abetted the Corporate and Individual Defendants in the discrimination, retaliation, and harassment referenced herein. At all times relevant hereto, Defendant Schutzenhofer is an “employer” as defined by the NJLAD and CEPA.

4. Defendant Sicoe, at all times relevant hereto, is a domiciliary of the State of New Jersey and Assistant General Manager of Defendant Trump National. This claim is brought against Defendant Sicoe in his individual capacity and as an agent of Defendant Trump National, who aided and abetted the Corporate and Individual Defendants in the discrimination, retaliation, and harassment referenced herein. At all times relevant hereto, Defendant Sicoe is an “employer” as defined by the NJLAD and CEPA.

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

6. At all relevant times, Corporate Defendants have been single and joint employers of Plaintiff within the meaning of the NJLAD. Upon information and belief, Corporate Defendants’ operations are interrelated and unified, and they share common management, centralized control of labor relations, common ownership, common control, common business purposes, and interrelated business goals. In addition, they jointly determine and manage the pay

practices, rates of employee pay and method of payment, maintenance of employee records and personnel policies, practices, and decisions with respect to the employees.

7. Defendants John Does 1-5 are currently unidentified individuals who acted in concert with Defendants and/or currently unidentified individuals responsible for the creation and/or implementation of anti-discrimination and anti-retaliation policies of the Corporate Defendants and are currently unidentified individuals who may have liability for the damages suffered by Plaintiff under any theory advanced herein.

FACTS COMMON TO ALL CLAIMS

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

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

10. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures requiring an employee who believes she was the victim of discrimination or retaliation to report the discrimination or retaliation to supervisory and management staff.

11. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures whereby it would engage in a timely and effective investigation of complaints of discrimination or retaliation brought to its attention by employees.

12. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures committing it to engage in a timely and effective investigation of complaints of discrimination or retaliation brought to its attention by employees.

13. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures committing it to undertake prompt and effective remedial measures to put a stop to any discrimination or retaliation it found to exist.

14. Plaintiff began her employment as Clubhouse Manager on or about January 23, 2023, and quickly proved herself a capable, hardworking, and dedicated leader who served both the Trump Defendants and their patrons with professionalism and care. Her performance was never the problem. Instead, her career was deliberately derailed because she was a woman who spoke up. Despite her strong record, Defendants subjected her to a targeted campaign of gender discrimination and retaliation for whistleblowing, stripping her of credibility, undermining her role, and ultimately destroying her career.

A. The Trump Defendants Engage in Gender-Based Discrimination, Sexual Harassment, and Retaliation in Response to Plaintiff's Objections.

15. On her first day of employment, General Manager, Defendant Schutzenhofer explained to Plaintiff that she was going to be an equal partner to Defendant Sicoe, whose job title was not explained at the time, but who was later named Assistant General Manager.

16. Defendant Schutzenhofer informed Plaintiff that Defendant Sicoe was “old-school European,” which meant, despite Plaintiff and Defendant Sicoe being equal partners, there would

be “gender differences.”¹ *Because of this, Defendant Schutzenhofer expressed concern over how Plaintiff and Defendant Sicoe would “work out” because Defendant Sicoe had “an issue with women.”*

17. Later that same day, Defendant Schutzenhofer discussed several employment candidates with Plaintiff, instructing and encouraging Plaintiff to take notes on which candidates would and would not be a great fit based on their looks.

18. Defendant Schutzenhofer told Plaintiff that female employees had to have a certain “look” to be hired and rejected a candidate because she did not meet that standard, stating that the woman appeared to have “lifted weights” and therefore looked unfeminine. Plaintiff found these comments unwelcome, offensive, and sexually harassing, as they reduced women to their appearance, reinforced gender stereotypes, and made clear that employment decisions were being based on conformity with sexualized and gendered expectations rather than merit.

19. These comments and the repeated emphasis on women’s appearance were not isolated or harmless. They were objectively offensive and would have been perceived as such by a reasonable woman in Plaintiff’s position. By tying hiring decisions to a sexualized and stereotyped “look,” Defendants communicated that women were valued for their bodies rather than their skills, altering the terms and conditions of employment and contributing to a hostile work environment in violation of New Jersey law.

¹ Many European societies subscribed to “Victorian” ideals of gender roles, named for the long reign of the British Queen Victoria. Women were to stay in the home, and if they went out, they usually only went to spaces separate from men. [\(https://www.oerproject.com/OER-Materials/OER-Media/HTML-Articles/AP-World-History/Unit5/Changing-Gender-Roles#:~:text=Many%20European%20societies%20subscribed%20to,began%20to%20resist%20European%20control\)](https://www.oerproject.com/OER-Materials/OER-Media/HTML-Articles/AP-World-History/Unit5/Changing-Gender-Roles#:~:text=Many%20European%20societies%20subscribed%20to,began%20to%20resist%20European%20control). (last visited December 15, 2025).

20. From March 24 to April 17, 2023, while Defendant Sicoe was on paternity leave, Plaintiff ran the Clubhouse on her own. ***Shortly after his return, Defendant Schutzenhofer informed Plaintiff that Defendant Sicoe would be promoted to Assistant General Manager and that Plaintiff would report to him, adding that she should not worry because she could keep her “sexy title and sexy office and salary.”***

21. On or about May 23, 2023, Plaintiff met with Defendant Schutzenhofer to address an email Defendant Sicoe sent to her and widely copied to coworkers, which was intended to publicly humiliate and reprimand her for issues that predated her tenure.

22. Plaintiff informed Defendant Schutzenhofer that Defendant Sicoe’s email was not legitimate performance feedback but a personal attack motivated by her gender. ***Plaintiff explained that the email was belittling and misogynistic, intended to demean her as a woman in authority and consistent with Defendant Schutzenhofer’s prior admission that Defendant Sicoe adhered to traditional gender roles.*** Plaintiff further advised that the conduct was unwelcome, offensive, and would be perceived by a reasonable woman in her position as discriminatory under New Jersey law.

23. ***Plaintiff complained to Defendant Schutzenhofer that Defendant Sicoe’s email was unacceptable, especially considering it was sent with an “audience” and reiterated that it seemed to be an “all-boys club” within Defendants’ workplace.*** Plaintiff further questioned why she was hired if this was Defendants’ mentality, and Defendant Schutzenhofer aggressively told her not to make such statements.

24. From June 15 to June 21, 2023, Plaintiff received numerous complaints from female direct reports describing open hostility and inappropriate, gender-based comments from male managers and staff, including Defendant Sicoe. These employees reported conduct that was

unwelcome, degrading, and intimidating, and that a reasonable woman would find offensive. On or about June 21, 2023, Plaintiff reported this open and pervasive gender discrimination and sexual harassment to HR Manager, Robin Gubantes (“Ms. Gubantes”).

25. ***On June 22, 2023, Plaintiff’s female direct reports informed her that Defendant Schutzenhofer had dismissed their complaints of discrimination by telling them to “vote the mean girls off the island” or that they could “always quit if they want.”*** That same day, Plaintiff was called into a meeting with Defendant Schutzenhofer, who, in clear retaliation for supporting the female staff in opposing sexual harassment and gender discrimination, accused Plaintiff of being “all talk and no action,” without identifying any source for the claim. The statements were belittling, misogynistic, and intended to undermine Plaintiff’s authority and credibility as a woman in leadership.

26. Defendant Schutzenhofer further suggested that he had “misrepresented the job” to Plaintiff, implying that she should not have raised objections to unlawful conduct or safety violations. ***The following day, on or about June 23, 2023, Plaintiff was called into a meeting with Defendants Schutzenhofer and Sicoe, during which Defendant Schutzenhofer claimed he had received feedback that Plaintiff and Sicoe were operating like “two divorced parents.” Defendant Sicoe, adhering to his self-described “old-school European” standards, refused to speak to, look at, or acknowledge Plaintiff, vaguely criticizing her for unspecified “shortcomings.”***

27. At the end of the meeting, when Defendant Schutzenhofer suggested that Defendant Sicoe shake Plaintiff’s hand, Sicoe refused, stating “that is not necessary,” signaling a belief in his superiority as the “dominant gender.” The conduct was belittling, misogynistic, and objectively

hostile, undermining Plaintiff's authority and reinforcing a culture that tolerated gender discrimination and harassment.

28. Upon commencement of her employment, Plaintiff was informed by Defendant Schutzenhofer that she would be paid an additional two hundred and fifty (250) dollars for each "Monday outing" shift she worked. This was also outlined in her offer letter. After observing her male coworkers consistently being scheduled for Monday outings and having never been scheduled for one by Defendant Sicoe, on or around June 27, 2023, Plaintiff raised concerns about this disparity with Defendant Schutzenhofer.

29. *In response, Defendant Schutzenhofer dismissed Plaintiff's concerns, stating "Honey, it's not going to get better unless you stop looking at things from a malice lens."* Defendant Schutzenhofer further asserted that it seemed as though Plaintiff was "taking this very personally" and she "needed to be more trusting."

30. Plaintiff responded by stating it is hard to be trusting when Defendant Sicoe continued to exclude her, providing an example from the day before, where Defendant Sicoe conducted new employee interviews without her. In return, Defendant Schutzenhofer told Plaintiff she was "too by the book" and that Defendant Sicoe "talks to the staff a certain way so that the team gets the job done" and "perhaps it's not the right way, but he's the only one holding people accountable."

31. Shortly thereafter, on or around June 30, 2023, Plaintiff was informed by her female direct reports that Defendant Schutzenhofer had told them they needed "tougher skins."

32. On or around July 20, 2023, one of Plaintiff's direct reports, Amanda Phelps ("Ms. Phelps"), informed Plaintiff that she would be formally complaining of retaliation she had experienced ever since she requested a raise from Defendants Sicoe and Schutzenhofer. After Ms.

Phelps confided in Plaintiff, Defendant Schutzenhofer refused to acknowledge Plaintiff until, on or around August 3, 2023, he directed her to a corner of the patio to “have a word.”

33. In an aggressive tone, Defendant Schutzenhofer said he was not going to call Plaintiff a “liar,” because that was too strong a word, but he said he was “testing” Plaintiff a few days prior when he asked if she knew anything about Ms. Phelps. Defendant Schutzenhofer further stated that Plaintiff was “upsetting” Ms. Gubantes, by “dumping” on her and “overwhelming” her by having “the girls” report the discrimination they were being forced to endure to HR.

34. ***Defendant Schutzenhofer instructed Plaintiff to stop reporting to and having “the girls” report discrimination to HR. Defendant Schutzenhofer also derisively stated Plaintiff was a “miserable person” who had to think long and hard if she wanted to continue working for the Trump Defendants.***

35. This conduct was objectively discriminatory and harassing. A male manager in Plaintiff’s position would not have been chastised for ensuring compliance with workplace policies or supporting employees in reporting misconduct. The targeted criticism, belittling language, and attempts to silence Plaintiff reflect disparate treatment based on her gender, creating a hostile work environment and reinforcing a culture in which women were devalued, marginalized, and retaliated against for asserting their rights under New Jersey law.

36. On or around August 11, 2023, Mackenzie Rhode (“Ms. Rhode”), a receptionist for Defendants, approached Plaintiff and voiced her concerns about the treatment of female staff by male management. She further emphasized that she had observed Plaintiff being “stripped” of her “managerial muscle” by male management.

37. On or around August 19, 2023, Plaintiff approached Youssef Abdelaal (“Mr. Abdelaal”), a food runner/captain for Defendants, about finishing work. Mr. Abdelaal stated he

could not speak with Plaintiff as this could get him in trouble, since he was only allowed to take orders from and speak to male management.

38. *On or around September 12, 2023, Plaintiff was informed that Defendants' Banquet Manager had declared to the female staff that he "didn't care if anyone was on their period," there were to be no bathroom breaks, and if they "needed a pad, they could ask for one and keep going." He further stated, "We all bleed together."*

39. This comment was disgusting, offensive, and objectively sexually harassing. It reduced female employees to their biological functions, created a hostile and degrading work environment, and sent the message that their basic bodily needs were irrelevant to their employment. A reasonable person in Plaintiff's position would find such remarks humiliating and offensive, contributing to a workplace that is both sexually hostile and discriminatory under New Jersey law.

40. On or around October 18, 2023, Plaintiff discovered that she and her female coworker had not been invited to attend a Club Manager's Association event while the male staff had been invited to attend. This exclusion was another clear example of disparate treatment based on gender. Plaintiff and her female coworker were intentionally denied access to professional opportunities routinely extended to their male colleagues, sending the message that women were not full participants in leadership or professional development. This differential treatment reinforced the hostile and discriminatory culture, signaling that male employees were valued and included while female employees were marginalized and systematically excluded solely because of their gender.

41. On or around November 9, 2023, Plaintiff had a meeting with Defendant Schutzenhofer to discuss an upcoming member event. After discussing the event's logistics,

Defendant Schutzenhofer said to Plaintiff that it seemed like she came into this job wanting to get people fired and had lost trust from everyone. ***He further stated that things had “gone south” when Plaintiff had told all “the girls” to go to HR, and Plaintiff should have directed them to go to Defendant Sicoe.***

42. In response, Plaintiff asserted that when she had accepted the job, she was led to believe that she would be running the Clubhouse, but instead, Defendant Sicoe was promoted, and her autonomy had been stripped. She further stated that she had not forced anyone to go to HR. In response, Defendant Schutzenhofer stated that Plaintiff was “not fitting in culturally.”

43. Further showcasing Defendants’ discriminatory animus, on or about December 14, 2023, Plaintiff learned from female staff members that they had received up to twenty (20) phone calls from Defendants’ Assistant Clubhouse Manager, Matthew Zuckerman (“Mr. Zuckerman”), asking them to “come over to [his] place” on the night of Defendants’ staff party.

44. On or around April 25, 2024, after Plaintiff had reprimanded one of her reports for abandoning his position, Plaintiff was reprimanded by Defendant Schutzenhofer for exercising her managerial authority over a male staff member. When Plaintiff objected, Defendant Schutzenhofer condescendingly told her “not to get smart with him.”

45. Further, on or around April 26, 2024, in reference to Plaintiff’s return from her work assignment assisting Defendants’ LIV Golf Tournament, Defendant Schutzenhofer told Plaintiff the club had been “lighter” and “ran easier” without her presence.

46. Shortly thereafter, on or around April 30, 2024, Plaintiff greeted Defendant Schutzenhofer and a group of male club members, including golf professional Mickie Gallagher. ***In a true showing of misogyny, Defendant Schutzenhofer, in an attempt to show off to Mickie***

Gallagher, stated to Plaintiff, “There you go, I was waiting for you to say hello,” in a suggestive tone.

47. On or around May 7, 2024, Defendant Sicoe reiterated to Plaintiff that he was solely in charge of determining who would work the Monday outings for extra pay, as he continued to schedule only Plaintiff’s male coworkers for the outings.

48. On or around June 6, 2024, Defendant Schutzenhofer told Plaintiff that Defendant Sicoe was now in charge of the employee schedule. Plaintiff had been doing it up to this point with no training or help. Plaintiff had even implemented a scheduling app, which helped streamline putting the schedule together.

B. Plaintiff Is Retaliated Against for Objecting to Health and Safety Violations.

49. Within the first months of her employment, Plaintiff reported serious health and food safety violations to Defendant Schutzenhofer, including employees drinking alcohol and vaping on duty, expired and unlabeled food, overfilled freezers, unsanitary kitchen conditions, and operating the Bistro without running water. Rather than address these concerns, Defendants retaliated by subjecting Plaintiff to a hostile work environment that culminated in her demotion and termination.

50. On or about January 30, 2023, Plaintiff met with Defendant Schutzenhofer to discuss her witnessing various team members drinking alcohol while on their shift. Defendant Schutzenhofer assured Plaintiff that this was no big deal and was “commonplace” in the industry despite the Employee Handbook’s Drug and Alcohol-Free Workplace provision.

51. In or around March 2023, Plaintiff saw multiple food and beverage items past their expiration date still being served to the Clubhouse members. *Again, when Plaintiff brought her*

concerns to Defendant Schutzenhofer, he was dismissive, claiming Plaintiff was “wrapped too tight” and new to working in golf clubs.

52. On or around May 26, 2023, the Bistro, a restaurant which serves food and drinks by the pool, was in operation all day while having no running water in violation of N.J.A.C. 8:24. When Plaintiff advised Defendant Schutzenhofer of this issue, he had no idea that it was a major DOH violation to operate a food establishment with no running water.

53. Shortly thereafter, Plaintiff asked Defendants Schutzenhofer and Sicoe to purchase a handwashing sink for the Halfway House and was told “no.” The Halfway House, located on the golf course to serve players during their game, lacked a handwashing sink while preparing food, which was a violation of N.J.A.C. 8:24. Plaintiff had asked for this on or around July 6, 2023, and again on or around December 26, 2023.

54. On or around August 23, 2023, Plaintiff had to go into the walk-in freezer to grab ice cream novelties for some Clubhouse members. Upon entering the freezer, she discovered food stacked from the ground all the way up to the ceiling. *The freezer was so overstocked, the condensers could not keep up in maintaining the food at the appropriate temperature. The condition presented multiple DOH infractions, including food not being stored at least six inches off the ground and food not being properly labeled and dated.* Due to the freezer not being maintained at the proper temperature, the ice cream novelties had melted, resulting in unnecessary waste of product and money. Plaintiff offered to help clean up the mess by hiring temporary staff.

55. Following the freezer incident, on or about September 2, 2023, Plaintiff lost responsibility for booking temporary labor staff by Defendant Sicoe.

56. *On or around September 12, 2023, Marisa Carcione, Director of Events, sent a text to Plaintiff and Jorge Villafuerte from maintenance regarding the flies that were all over*

the Clubhouse due to the unkempt, unsanitary working areas. Upon information and belief, President Donald J. Trump had complained about the flies in the Clubhouse.

57. On or around January 20, 2024, Plaintiff became aware that Eric Trump had sent an email to Defendants regarding the need for all properties operated by the Trump Defendants to be DOH compliant, but she was concerned that she had not been copied on the message. The email is reproduced below:

Team,

As all of you know, in both 2016 and 2020 we were targeted heavily by health inspectors (kitchen and pool facilities) - a few of them incredibly eager and politically motivated to try and embarrass us at certain properties - people who made it clear that they wanted to find something at any cost.

Please make sure every aspect of our operations are spotless - kitchens, bars, backbars, walk in freezers, pools/chemical levels, our spas, grease traps, ice machines, hallway houses, bistros, etc. Every aspect of our operations have to be beyond perfect - it's what we all expect and demand everyday regardless of a political cycle - but mark my word, we will see the same "antics" again. We know this game... last night puts us that much closer.

I leave it to all of you - please make this a huge focus. Increase your deep cleans, daily checks and all routine maintenance. Where we have outside vendors (pools etc), GM's please read them the riot act and make sure this expectation is set that if they fail in this regard, their services will be terminated.

Thank you all,

Eric

58. Plaintiff found it both odd and troubling that, as Clubhouse Manager, she was neither a recipient nor copied on the email. Instead, she learned of it from Mr. Zuckerman. Notably, the email was sent only to her male coworkers.

59. On or around January 25, 2024, Plaintiff was asked by Ms. Gubantes to meet with Jason Miller ("Mr. Miller"), Assistant General Counsel. The purpose of Mr. Miller's visit was to conduct an audit of Club practices in Bedminster. Mr. Miller had questions regarding the property and Clubhouse, which no one from the senior leadership team could answer to, per Ms. Gubantes, even though Defendants Schutzenhofer and Sicoe were both on site and had been employees for several years.

60. The topics discussed with Plaintiff ranged from alcohol and food safety, HR policies, uniforms, and scheduling. Plaintiff informed Mr. Miller that there was barely any training for alcohol and food safety, how she witnessed employees drinking alcohol at work, major DOH

violations, the freezer situation from August 2023, and how there was hardly any HR presence at the Club.

61. On or around February 17, 2024, Plaintiff was doing a deep clean with Ms. Byrnes and Mr. Zuckerman when they discovered a bunch of products, including Coca-Cola products and beers, that were past their expiration date and therefore were discarded. Plaintiff reported her findings to Defendant Sicoe and the number of discarded food products for inventory purposes. In response to Plaintiff's email, Defendant Sicoe made it clear that he was the only one to oversee Coca-Cola products from that point forward.

62. On or around June 9, 2024, at 8:45 p.m., Plaintiff was made aware of a very intoxicated Clubhouse member who passed out drunk at the Bistro by a valet employee. This was originally brought to Defendant Sicoe's attention, and Defendant Sicoe's solution was to advise the valet to take the members' car keys. Defendant Sicoe then promptly left for the evening.

63. With no guidance from Defendant Sicoe, Plaintiff made the decision to have the member driven home by a team member in his car, so that he could get home safely.

64. Concerned that the overserved member at the Bistro could have caused a worse outcome, Plaintiff emailed Defendants Schutzenhofer and Sicoe with a timeline of the night's events. Her investigation showed the member had ordered six triple drinks, and two other men at the bar were also buying him drinks.

65. Plaintiff raised the need for a TIPS training class to educate team members on when to cut people off and emphasized to the Club's staff the importance of safety and the Club's reputation, especially during an election year. Around July 17, 2024, she realized she had been excluded from the weekly banquet event order meetings for several weeks. The Director of Events confirmed the meetings were still held, but only Defendant Sicoe and the Chefs were invited

66. On or around September 21, 2024, Plaintiff discovered the Bistro in disarray with multiple DOH violations and reported them to Defendant Sicoe. She observed standing water, dirty drains, sticky floors, ice buildup in the ice cream freezer, and maggots and mold in the soft-serve machine, along with expired food products, including egg whites over a month past expiration and ice cream mix two months past expiration.

67. Defendant Sicoe refused to schedule employees to address the Bistro's health code violations, dismissing Plaintiff's concerns, so she directed two employees to help her clean up. On or around October 15, 2024, Plaintiff learned she was excluded from the Club Manager's Association of America ("CMAA") event, which only male management attended. Then, on or around November 28, 2024, despite her requested day off, she was forced to work Thanksgiving in a non-managerial role, serving a table of three in the Clubroom, while the Thanksgiving event took place in the Ballroom. Of note, the customers whom Plaintiff served expressed their shock that a manager had been assigned to serve them.

68. On or around December 2, 2024, Plaintiff was again not invited to the CMAA event, and only male management were invited to attend.

C. The Trump Defendants Place Plaintiff on a Retaliatory PIP in Response to Her Objections to Sexual Harassment, Gender Discrimination, and DOH Non-Compliance.

69. On or around December 20, 2024, Plaintiff was placed on a ninety-day performance improvement plan, which was vague and subjective. Among other directives, it criticized her for using certain "expressions," described as "off-putting," reflecting yet another form of gender-based harassment and creating a hostile work environment

70. Clearly, this PIP was nothing more than an additional showcase of Defendants' discriminatory and retaliatory animus, as the above-referenced PIP "goal" was akin to stating Plaintiff should "smile more."²

71. Of note, Plaintiff was informed by Ms. Phelps that Defendants Schutzenhofer and Sicoe told her to "smile more" in response to Ms. Phelps' inquiry regarding a raise.

72. In discussing the PIP, Defendant Schutzenhofer stated to Plaintiff that all she does is complain in response to Plaintiff reiterating the discriminatory and sexually harassing treatment she had endured from male management. Defendant Schutzenhofer further stated things had gotten "weird," and that was why she had been excluded from events, outings, and meetings in favor of male management.

73. The PIP was administered five (5) days after the Club's annual Holiday Gala, where Plaintiff was assigned by Defendant Schutzenhofer to locate a member's missing mink coat and was successful in doing so.

74. On or around January 8, 2025, Plaintiff made a call to Defendants' Corporate staff to discuss her PIP. In a conversation with Mr. Miller, Defendants' counsel, she reiterated the conversation she had had with him in January of 2024 regarding the unlawful conduct taking place within Defendants' workplace and requested guidance in relation to the PIP she was placed on. Mr. Miller immediately shut down the conversation and directed Plaintiff to Deirdre Rosen ("Ms. Rosen"), Senior Vice President of HR.

² The pressure on girls to be fun, happy and smiling reveals much about the cultural expectations projected onto girls and girlhood. This constant expectation of girls to be always smiling depoliticizes girls and positions them as compliant in their own subjugation. Perhaps the most public callout to a girl to smile was Donald Trump's caustically sarcastic tweet that climate activist Greta Thunberg "[seems like a very happy young girl looking forward to a bright and wonderful future. So nice to see!](https://theconversation.com/stop-telling-girls-to-smile-it-presses-them-to-accept-the-unjust-status-quo-156092)" <https://theconversation.com/stop-telling-girls-to-smile-it-presses-them-to-accept-the-unjust-status-quo-156092> (last visited December 15, 2025).

75. Plaintiff had a phone call with Ms. Rosen to review the PIP. During their conversation, Plaintiff brought to Ms. Rosen's attention the retaliation and major health code violations that were present in the workplace.

76. In response, Ms. Rosen informed Plaintiff that while she could call Defendant Schutzenhofer to discuss, she "did not think it would do any good." Ms. Rosen further stated that even if Plaintiff's PIP was removed from her file, the people and practices within Defendants' workplace would "remain the same," and questioned if the removal of the PIP would even "make [Plaintiff] happy." Adding insult to injury, Ms. Rosen then suggested to Plaintiff that she seek employment elsewhere, as clearly there was no remedy to the discrimination and retaliation she was facing.

77. Shocked by Ms. Rosen's assertions, Plaintiff objected to this suggestion and shared the email she had drafted to send to Defendant Schutzenhofer debunking the baseless PIP with Ms. Rosen. Ms. Rosen advised Plaintiff to meet with Defendant Schutzenhofer face to face to discuss the PIP instead of sending the drafted note which Plaintiff devised. Later in the week, Plaintiff and Defendant Schutzenhofer decided that they would meet on Fridays at 2:00 p.m. to have the weekly PIP review.

78. Then, on or around February 7, 2025, Defendant Schutzenhofer asked Plaintiff for her opinion on a new bartender, stating she was "crazy" and "emotionally unstable." Plaintiff responded that she had been a high performer thus far and took great care in maintaining the cleanliness of the bar.

79. On or around February 8, 2025, Plaintiff, for the third time, requested a handwashing sink for the Halfway House, as she was concerned about the massive DOH violation

not having one posed, especially in an area that is preparing and serving food. The request was yet again dismissed.

80. In a blatant act of retaliation, on or around February 14, 2025, Defendant Sicoe relegated Plaintiff, the Club's Director with managerial status, to work coat check at the Valentine's Day Dinner. Several members of the Club expressed their utter disbelief that someone in her position was reduced to this role, highlighting yet another instance of gender-based humiliation and harassment

D. Plaintiff Is Demoted, and Ultimately Terminated, for Objecting to Defendants' Unlawful Conduct.

81. On or around March 7, 2025, Plaintiff was advised by Defendant Schutzenhofer that he was considering repositioning her from Clubhouse Manager to being responsible for managing the Bistro. Defendant Schutzenhofer prefaced this by saying that it was not a "demotion" and wasn't to be seen as a "punishment." Defendant Schutzenhofer attempted to frame the adverse employment action as an "opportunity" to Plaintiff, as Eric Trump and former United States Attorney Alina Habba ("Ms. Habba") had been disappointed with the service in the Bistro.

82. On or around March 21, 2025, Plaintiff's PIP was to end; however Defendant Schutzenhofer never concluded closing out the PIP. During the ninety-days of the PIP, they had eleven (11) opportunities to meet for their weekly review meetings, and Defendant Schutzenhofer cancelled six of those meetings.

83. On or around March 30, 2025, Plaintiff was brought down to the dry storage area by an unnamed employee to show her where various team members drink on the job. There were a great deal of empty beer cans and bottles throughout the storage racks and ceiling beams.

84. On or around April 10, 2025, Defendant Schutzenhofer confirmed that Plaintiff was being reassigned from Clubhouse Manager to managing the Bistro, which was a clear demotion.

Prefacing the announcement with a condescending, “We aren’t going to cry or raise our voices, are we?”, he underscored the gendered harassment. Undeterred, Plaintiff replied, “No, we are going to control our emotions and have a professional conversation,” exposing yet another example of the workplace’s sexist treatment.

85. On or around April 25, 2025, Defendant Schutzenhofer aggressively pulled Plaintiff outside to question why members had complained about her demotion. He ordered her to “get on board” with fixing the Bistro to please high-profile members like Eric Trump, Ms. Habba, and the Kushner family, turning a managerial reassignment into yet another humiliating, gendered power play

86. ***On or around May 6, 2025, there was a DOH Inspection that the Club failed miserably. While the inspection was taking place, Defendant Schutzenhofer was enjoying lunch in the Clubroom even though he is noted as the “person in charge.”*** Most of the violations cited were items Plaintiff had previously reported to Defendants Schutzenhofer and Sicoe that needed prompt attention, including the following violations:

-Violation Code: 6.7(n). Observation: Hand-wash sink at the Halfway kitchen had a sanitizer bucket placed in it. Hand wash sink must be available at all times to wash hands.

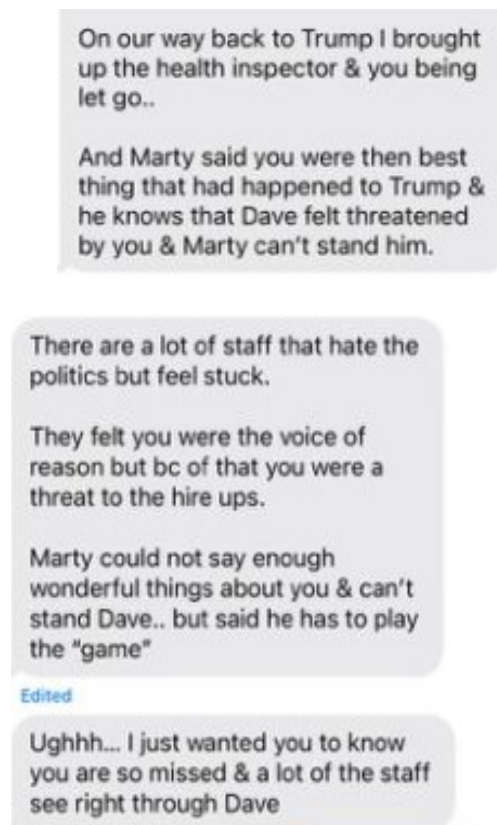
-Violation Code: 3.3(c)1i. Observation: Raw meat stored directly above cheese container in refrigerator under counter in main kitchen. Raw food items must be stored separate/below from ready to eat food to avoid cross contamination of food.

-Violation Code: 3.1. Observation: Expired milk in use with date 5/3/25 was found in the refrigeration unit. Item was discarded. Food must be safe for consumption.

-Violation Code: 3.3(q). Observation: Food boxes were stored directly on the floor in Walk in freezer in the main kitchen. Food boxes and ice cream containers were stored on the floor in Walk in freezer in basement. All food items must be stored at least six inches above the ground.

87. On or around May 9, 2025, only three (3) days after the failed health inspection, Plaintiff was terminated from her position as Clubhouse Manager. Defendant Schutzenhofer texted Plaintiff that they would be having a one-on-one meeting in her office at 2:00 p.m. At the meeting, Plaintiff's employment was terminated.

88. Plaintiff, since her termination, has received an overwhelming number of texts and calls from the Club's members expressing how upset they were about her firing:



89. On or around June 9, 2025, Plaintiff formally complained to Eric Trump, Executive Vice President of the Trump Organization, responsible for overseeing the Organization's golfing facilities, about the clear retaliation she faced at the hand of Defendants, stating, in pertinent part:

...As I am sure you are aware, Trump Bedminster made headlines several days ago regarding a recently failed health inspection. Since the beginning of my employment at Trump Bedminster, I identified negligence in food handling and food safety practices. These concerns were brought to our General Manager, David Schutzenhofer's attention, and in turn, I was met with remarks such as "you're

wrapped too tight,” and “you’re new to clubs.” Please know that these concerns were also brought up again in January 2024 to Jason Miller, employment lawyer with the Trump Organization, and again in January 2025 to Deirdre Rosen, Senior VP of HR. From what these articles read, David is quoted for stating “This is clearly nothing more than a politically motivated attack.” It is also quoted in these articles that “The person in charge fails to demonstrate knowledge of food safety.” Let it be known that David’s name is listed on the health inspection report from May 6 as “the person in charge.” David also played no active part throughout the inspection; he was dining in the Clubroom during the duration of the walk-through. What is most disturbing is that I am hearing from members and a few staff members that my name is being slandered. The staff is being scripted to say that I leaked the department of health infractions to the media, and that I was fired for being a hostile employee to my co-workers/staff. This is so far from the truth; in fact, several of my staff throughout my two and half years of working at the club have entrusted me to write recommendation letters/serve as a job reference on their behalf. I cannot imagine staff would feel comfortable in asking this of me if I really was a hostile person. The climate and culture in Bedminster are psychologically unsafe. It would be unjust of me to not bring this to your attention/to the attention of President Trump’s. I cannot imagine this is what the Organization condones...

90. In response, Eric Trump simply stated he “received the email” and would “share it with my corporate team.”

91. Adding insult to injury, the only response Plaintiff received was from Ms. Rosen, who acknowledged receipt of Plaintiff’s complaint, but could only offer vague references to a “breakdown in leadership” and the “purchase of a new hostess station” as justification for Plaintiff’s termination.

92. Because of the joint and several acts and omissions of the Corporate Defendants, Individual Defendants, John Does 1-5, and ABC Corporations 1-5, Plaintiff has been and continues to suffer economic losses and pecuniary damage in the form of lost income and benefits past, present, and future.

93. Because of the joint and several acts and omissions of the Corporate Defendants, Individual Defendants, John Does 1-5, and ABC Corporations 1-5, Plaintiff has been and continues to suffer non-economic damages in the form of humiliation, stress, and anxiety, causing her mental

and emotional anguish and dysfunction and physical manifestations of same, including, but not limited to, nightmares, inability to sleep, weight gain, headaches, panic attacks, crying, negative thoughts, nervousness, anxiousness, anxiety attacks, upset stomach, and stomach pains, all or some of which may be permanent.

COUNT ONE

NJLAD – SEXUAL HARASSMENT, GENDER DISCRIMINATION, DISPARATE TREATMENT & HOSTILE WORK ENVIRONMENT

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

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

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

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

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

99. As the employer and/or supervisor of Plaintiff, Defendants are vicariously, strictly, and/or directly liable to Plaintiff pursuant to the NJLAD, N.J.S.A. 10:5-1, et seq., in that the affirmative acts of harassment, discrimination, and retaliation committed by Individual Defendants occurred within the scope of their employment; the creation of a hostile work environment was aided by Corporate Defendants in delegating power to Individual Defendants to control the day-to-day working environment; and/or Corporate Defendants were deliberately indifferent, reckless,

negligent, and/or tacitly approved the discrimination, hostile work environment, and/or retaliation; and/or Defendants failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training, and/or monitoring mechanisms for same, despite the foreseeability of harassment, discrimination, and retaliation in the workplace; and/or by having actual knowledge of the harassment, discrimination, and retaliation of Plaintiff and failing to promptly and effectively act to stop it.

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

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

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

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the law, punitive damages, emotional distress damages, pre- and post-judgment interest, and attorneys' fees

and costs of suit. More specifically, Plaintiff demands judgment against Defendants for harm suffered in violation of the NJLAD as follows:

- A. Reinstatement of employment and all benefits;
- B. Back pay and benefits;
- C. Front pay and benefits;
- D. Compensatory damages;
- E. Consequential damages;
- F. Reinstatement;
- G. Punitive damages;
- H. Pre-judgment 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 prevention 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 prevention 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 and appropriate professional to investigate any future complaints of retaliation; and

- Z. Such other relief as may be available and which the Court deems just and equitable.

COUNT TWO
NJLAD – RETALIATION/IMPROPER REPRISAL

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

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

105. As a direct result, Defendants took retaliatory actions against Plaintiff, which are outlined above.

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

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

WHEREFORE, Plaintiff demands judgment in her 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 attorneys' fees and costs of suit. More specifically, Plaintiff demands judgments 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. Pre-judgment 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 prevention 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 prevention 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 and 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 THREE
RETALIATION IN VIOLATION OF NEW JERSEY'S CONSCIENTIOUS EMPLOYEE
PROTECTION ACT ("CEPA")

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

108. As set forth at length above, Plaintiff reported, complained of and/or refused to participate in Defendants' unlawful and/or unethical behaviors. This includes Plaintiff's reports of health and safety violations, discrimination, retaliation, and disparate treatment.

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

110. As a direct result of Plaintiff raising complaints and/or threatening to disclose raising complaints and refusing to participate in Defendants' unlawful and/or unethical behaviors, Defendants took retaliatory action against Plaintiff as set forth above at length.

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

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

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

- A. Reinstatement of employment and all benefits;
- B. Back pay and benefits;
- C. Front pay and benefits;
- D. Compensatory damages;
- E. Consequential damages;
- F. Reinstatement;
- G. Punitive damages;
- H. Pre-judgment 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 CEPA and which the Court deems just and equitable;
- K. Ordering Defendants to take appropriate corrective action to stop and prevent retaliation at the workplace;
- L. Ordering Defendants to undergo anti-discrimination training;
- M. Ordering Defendants to undergo anti-retaliation training;
- N. Ordering Defendants to undergo anti-harassment training;
- O. Ordering Defendants to undergo workplace civility training;
- P. Ordering Defendants to undergo bystander prevention training;
- Q. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-discrimination training;
- R. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-retaliation training;
- S. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-harassment training;
- T. Ordering Defendants to engage a research organization to assess the effectiveness of their workplace civility training;
- U. Ordering Defendants to engage a research organization to assess the effectiveness of their bystander prevention training;
- V. Ordering Defendants to identify an appropriate professional to investigate any future complaints of discrimination;
- W. Ordering Defendants to identify an appropriate professional to investigate any future complaints of harassment;
- X. Ordering Defendants to identify and appropriate professional to investigate any future complaints of retaliation; and
- Y. Such other relief as may be available and which the Court deems just and equitable.

COUNT FOUR
WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY

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

114. During the course of her employment, Plaintiff reported and complained about Defendants' unlawful behavior. Defendants had knowledge of Plaintiff's protests and altered her employment status and/or work environment and/or terminated her as a result thereof.

115. The acts of Defendants constitute a wrongful discharge in violation of public policy by which Plaintiff has been damaged and will continue to suffer damages.

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

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

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

DEMAND FOR TRIAL BY JURY

Plaintiff demands a trial by jury on all issues.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Justine Sacks

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

Dated: December 19, 2025

DESIGNATION OF TRIAL COUNSEL

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

CERTIFICATION

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

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

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Justine Sacks

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

Dated: December 19, 2025

Christian V. McOmber, Esq. – NJ ID #012292010

cvm@njlegal.com

Peter D. Valenzano, Esq. – NJ ID #037892010

pdv@njlegal.com

Anna F. Esposito, Esq. – NJ ID #409612022

afe@njlegal.com

McOMBER McOMBER & LUBER, P.C.

54 Shrewsbury Avenue

Red Bank, NJ 07701

(732) 842-6500 Phone

Attorneys for Plaintiff, Justine Sacks

<p>JUSTINE SACKS,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; DAVID SCHUTZENHOFER; RAUL SICOE; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MONMOUTH COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p>FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS</p>
--	---

**PLAINTIFF’S FIRST SET OF DOCUMENT REQUESTS, INTERROGATORIES, AND
DISCOVERY DEMANDS RELATING TO PUNITIVE DAMAGES**

PLEASE TAKE NOTICE that McOmber McOmber & Luber, P.C., attorneys for Plaintiff, Justine Sacks (“Plaintiff”), demand that Defendants Lamington Farm Club, LLC d/b/a Trump National Golf Club, Bedminster (“Defendant Trump National” or “Trump Defendants”), David Schutzenhofer (“Defendant Schutzenhofer”), and Raul Sicoe (“Defendant Sicoe”) (collectively “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. “Plaintiff” shall mean, individually and collectively, each Plaintiff identified in the above-captioned action. If more than one Plaintiff is identified in the caption as a party to this lawsuit, Defendants must respond to each request with specific responses applicable to each Plaintiff in this lawsuit.

2. “Defendant Trump National” or “Trump Defendants” shall mean Lamington Farm Club, LLC d/b/a Trump National Golf Club, Bedminster, and any of its officers, directors, employees, agents, representatives, successors, predecessors, assigns, divisions, affiliates, subsidiaries, and all persons acting or purporting to act on its behalf.

3. “Defendant Schutzenhofer” shall mean David Schutzenhofer, Defendant in the above-captioned action.

4. “Defendant Sicoe” shall mean Raul Sicoe, Defendant in the above-captioned action.

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

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

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

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

9. 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.

10. 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.

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

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

13. 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, that were filed with the Court in the above-captioned Action.

14. 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.

15. 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.

16. 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.

17. 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.

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

19. The “Relevant Time Period” is January 23, 2023, until present.

20. The term “concerning” is construed in the broadest possible sense to include 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.

21. 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 include, *inter alia*, concerning to, embodying, constituting, describing, connected with, commenting on, responding to, evidencing, identifying, supporting, contradicting, rebutting, pertaining to, and/or relating in any way.

22. The terms “including” and “include” shall be construed in the broadest possible sense to include “including without limitation.”

INSTRUCTIONS

1. The terms “all” and “any” shall both be construed as “any and all.”
2. The terms “and,” “or,” and “and/or” as used herein shall be construed conjunctively or disjunctively to bring within the scope of these topics and requests any and all information which might otherwise be construed as outside their scope.
3. In addition to the specific instructions contained herein, these Document Requests and Interrogatories shall be subject to the New Jersey Rules of Court.
4. 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.
5. Interrogatory answers shall be typed beneath the questions and the original shall be returned in accordance with R. 4:17-4(c).
6. 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.
7. 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.
8. 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.
9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

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

17. 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 with in a privilege log which includes: (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.

18. 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.

19. 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.

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

21. 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).

22. 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 ***(Directed to All Defendants)***

Insurance

1. 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

2. A complete copy of the personnel file Defendant(s) maintained pertaining to

Plaintiff, including, but not limited to, copies of Documents relating to the following: (a) medical records and reports; (b) pay and benefits provided to Plaintiff; (c) attendance, sick time, disability time, personal time and/or vacation time; (d) commendations and/or performance reviews regarding Plaintiff; (e) job title or job status changes; (f) Documents relating to any leave of absence; and (g) employer policy information provided to Plaintiff, if any.

3. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any 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; and (c) job title or job status changes for any Individual Defendant.

4. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any “job comparator”³ of Plaintiff employed by Defendants during the term of 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 such person; (b) performance evaluations that were conducted for any such person; and (c) job title or job status changes for any such person.

Allegations

5. Produce all communications, whether written, electronic, or recorded, between Plaintiff and Defendant(s) concerning any of the following matters: (a) Plaintiff’s reports of Department of Health violations, safety violations, health violations, expired food, the status of

³ For purposes of this Document Demand, a “job comparator” can be defined as an employee who holds the same or similar job responsibilities as Plaintiff, reports to the same supervisor as Plaintiff, and is generally subject to the same standards and expectations as Plaintiff.

food preparation areas, employees drinking on the job, and handwash stations; (b) the scheduling of Monday Outings; and (c) Plaintiff's reports of disparate treatment of female employees and/or the preferential treatment of male employees. Such communications include, but are not limited to, emails, text messages, written correspondence, or recorded meetings.

6. Produce all internal communications among Defendants, including, but not limited to, emails, text messages, meeting notes, or memoranda, concerning any of the following: (a) Plaintiff's reports of Department of Health violations, safety violations, health violations, expired food, the status of food preparation areas, employees drinking on the job, and handwash stations; (b) the scheduling of Monday Outings; (c) Plaintiff's reports of disparate treatment of female employees or preferential treatment of male employees; and (d) Plaintiff's job responsibilities.

7. Communications between Club Members and Defendants (emails, text messages, meeting notes, or memos) regarding DOH violations, safety violations, health violations, expired food, the status of food preparation areas, employees drinking on the job, and handwash stations.

8. Documents related to Defendant Sicoe and Schutzenhofer's treatment of female employees, including any communications or complaints from other employees regarding his conduct.

9. Produce all written correspondence, including, but not limited to, emails, text messages, and memoranda, between Plaintiff and any Defendant, and among Defendants, regarding Plaintiff's transfer to the Bistro, her Performance Improvement Plan (PIP), and her termination, including all communications relating to the planning, discussion, or execution of any of these actions.

10. Produce all documentation related to the employment of Pat Neira and Matt Zuckerman with Defendants, including, but not limited to, their job descriptions, performance

evaluations, any complaints or reports made regarding their behavior, and any actions taken by Defendants in response to complaints or reports concerning their conduct, including any inappropriate behavior toward female employees.

11. Provide all documentation related to any complaints of gender discrimination, retaliation, and harassment made by Plaintiff or any other employee against Defendant Schutzenhofer, Defendant Sicoe, Pat Neira, Matt Zuckerman, or any other individual employed by Defendants. This includes any written or verbal complaints, investigation records, reports, and any actions taken by Defendants in response to those complaints, including communications with HR or management.

12. Provide all documentation related to any complaints of health and safety violations made by Plaintiff or any other employee. This includes any written or verbal complaints, investigation records, reports, and any actions taken by Defendants in response to those complaints, including communications with HR or management.

13. Produce all documents, including emails, calendars, memos, shift schedules, or notes, showing Plaintiff's assigned work hours, duties, or station assignments during the Relevant Time Period, as well as any documents reflecting deviations, changes, or reassignments of Plaintiff's duties compared to similarly situated employees.

14. Produce all internal communications, including emails, text messages, instant messages, and meeting notes, referencing observations or complaints by any employee (other than Plaintiff) regarding workplace health and safety issues, expired food, hygiene violations, or improper employee conduct in Plaintiff's work areas.

15. Produce all supporting documentation, drafts, or notes relied upon by Defendants in creating, revising, or approving Plaintiff's PIP, including any metrics, complaints, or evaluations

used to justify the PIP.

16. Produce all documents relating to complaints, investigations, or disciplinary actions taken regarding male employees who engaged in behavior similar to that alleged by Plaintiff (e.g., drinking on the job, improper conduct, or safety violations), including any internal communications about how such complaints were handled.

17. Produce all documents showing rationale, approvals, or discussions among Defendants for any adverse actions taken against Plaintiff, including demotion, transfer, change in responsibilities, reduction in pay or hours, or termination, specifically reflecting consideration of Plaintiff's reports of DOH violations, harassment, or safety concerns.

Plaintiff's Hiring & Employment

18. Produce all documents related to Plaintiff's hiring and employment, including job applications, contracts, onboarding materials, handbooks, policies, and procedures, as well as documents concerning her compensation, benefits, performance, discipline, adverse actions, and termination, including use of any company-issued credit card.

Job Description & History

19. A written job description for each and every position that Plaintiff or any Individual Defendant held during Plaintiff's employment with Corporate Defendant(s).

Policies & Procedures

20. Produce all policies, practices, and procedures of Defendant(s) during the Relevant Time Period regarding discrimination, harassment, and retaliation; health and safety, food preparation, and DOH compliance; and the service of alcohol.

Training

21. Produce all statements, documents, or communications relating to any training or

education completed by Defendant(s) during the Relevant Time Period, including anti-harassment, anti-discrimination, anti-retaliation, health and safety, food preparation, DOH compliance, alcohol service, sensitivity, or appropriate workplace conduct.

Statement & Witnesses

22. Any and all statements, documents, or communications made by any person, including Defendant(s)' employees, coworkers, or Plaintiff, that relate to the allegations in the Complaint, the defenses or denials asserted in the Answer, and any admissions or information related to this action.

Trial & Experts

23. All documents Defendant(s) intend to use or may rely upon in this litigation, including, but not limited to, those for depositions or trial, expert reports, and any books, treatises, pamphlets, or other printed materials upon which Defendant(s) or their experts will rely to support their defenses.

Internal Complaints & Investigation

24. Produce all statements, documents, or communications relating to any complaints, protected conduct, or grievances made by Plaintiff, any investigations concerning Plaintiff or Defendants—including those related to discrimination, harassment, hostile work environment, retaliation, or NJLAD and CEPA claims—and all reports or drafts thereof.

Other Litigation

25. Produce all documents from the past ten years concerning internal complaints, grievances, lawsuits, claims, charges, arbitrations, or proceedings against Corporate Defendants relating to harassment, discrimination, hostile work environment, retaliation, or alleged violations of federal or state law, CEPA, NJLAD, or DOH compliance.

Communication

26. Produce all photographs, videos, recordings, messages, and communications between Defendant(s) and Plaintiff, between or among Individual Defendants regarding Plaintiff, and between Defendant(s) and their agents, servants, or representatives that relate to this litigation, including any communications with the Human Resources department, phone call logs, and teleconference/videoconference records (such as Zoom or Teams).

Other

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

Notices

28. 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.

Job Comparators & Replacement

29. Produce all job descriptions for any positions held by Plaintiff's comparators during her employment, as well as all documents regarding job vacancies, postings, or promotional opportunities within three months before and after Plaintiff's termination, including those intended to fill or assume Plaintiff's former duties.

INTERROGATORIES
(Directed to All Defendants)

Insurance

1. 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). Please also 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.

Allegations

2. Identify all communications between Plaintiff and Defendants regarding any of the following topics: (a) Plaintiff's reports of DOH violations, safety violations, health violations, expired food, the status of food preparation areas, employees drinking on the job, and handwash stations; (b) the scheduling of Monday Outings; (c) Plaintiff's reports of disparate treatment of female employees and/or preferential treatment of male employees; (d) Plaintiff's job responsibilities; (e) Plaintiff's transfer to the Bistro; (f) Plaintiff's PIP; and (g) Plaintiff's termination. For each communication, including, but not limited to, emails, text messages, written correspondence, or recorded meetings, provide the date, the parties involved, and the content or subject matter discussed.

3. Please describe all performance evaluations for Plaintiff, and any other evaluations, assessments, or feedback related to her work performance from the start of her employment to her termination. Please include the date of each evaluation and provide a summary of the feedback or ratings given.

4. Please describe all internal communications (emails, meeting notes, or memos) within Defendant Trump National regarding Plaintiff's reports of DOH violations, safety violations, health violations, expired food, the status of food preparation areas, employees drinking on the job, and handwash stations. For each communication, provide the date, the parties involved, and the content or subject matter discussed.

5. Identify all individuals who held the same or substantially similar positions as Plaintiff during her employment, and for each such individual, state their full name, gender, age, job title, dates of employment in the position, and any changes to their job responsibilities, title, or status during the Relevant Time Period.

6. For the past five (5) years, state the total number of employees terminated by Defendant(s), broken down by gender and, if available, by job title or position at the time of termination.

7. Describe all internal communications (including emails, meeting notes, or memos) within Defendant Trump National concerning (a) Plaintiff's reports of disparate treatment of female employees and/or the preferential treatment of male employees, (b) Plaintiff's transfer to the Bistro, and (c) Plaintiff's PIP. For each such communication, state the date, all parties involved, and the content or subject matter discussed.

8. Please describe all internal communications (emails, meeting notes, or memos) within Defendant Trump National regarding Plaintiff's termination. For each communication, provide the date, the parties involved, and the content or subject matter discussed.

9. Please describe Defendant's health & safety policies, including any related procedures, guidelines, or communications that would apply to Plaintiff's reports of health and safety violations and DOH non-compliance. Specifically, explain any policies regarding food storage and preparation.

10. Please describe Defendants Sicoe and Schutzenhofer's treatment of female employees, including any communications or complaints from other employees regarding their behavior and conduct.

11. Please describe Pat Neira and Matt Zuckerman's treatment of female employees, including any communications or complaints from other employees regarding their behavior and conduct.

12. Please identify all disciplinary actions, write-ups, or warnings issued to Plaintiff during her employment with Defendants, including any documentation related to her PIP, transfer to Bistro, and termination. For each instance, please provide the date, the nature of the violation, and the individuals involved in issuing the disciplinary action.

13. Please describe all documents related to Defendant Schutzenhofer's employment with Defendants, including his job description, performance evaluations, complaints or reports made about his behavior, and any actions taken by Defendants in response to complaints regarding his workplace conduct. Include specific details regarding the investigations and any corrective actions taken, if applicable.

14. Please describe all documents related to Defendant Sicoe's employment with Defendants, including his job description, performance evaluations, complaints or reports made about his behavior, and any actions taken by Defendants in response to complaints regarding his workplace conduct. Include specific details regarding the investigations and any corrective actions taken, if applicable.

15. Describe all documents related to the employment of Pat Neira and Matt Zuckerman with Defendants, including their job descriptions, performance evaluations, complaints or reports made about their workplace behavior, and any actions taken by Defendants in response to such complaints. For each document, include specific details regarding any investigations conducted and any corrective or disciplinary actions taken, if applicable.

16. Please describe all documentation related to any complaints made by Plaintiff or any other employee against Defendants or any other individual employed by Defendants concerning (a) gender discrimination, harassment, and retaliation, and (b) DOH violations, safety violations, health violations, expired food, the status of food preparation areas, employees drinking on the job, and handwash stations. Include all written or verbal complaints, investigation records, reports, and any actions taken by Defendants in response to these complaints, and specify any communications with HR, management, or other relevant parties regarding these complaints.

Termination

17. State with specificity each and every legitimate, non-discriminatory, and/or non-retaliatory reason for any adverse employment action taken against Plaintiff during her employment, including, but not limited to, termination, suspension, demotion, or placement on a PIP, and provide the factual basis for each reason. Identify all individuals involved in the decision to take any such adverse action, describing each individual's role and input in the decision. Further, identify the date, time, and location of any meetings at which Plaintiff's employment or adverse actions against her were discussed, and identify all individuals present at such meetings. Attach any and all documents related to or discussing Plaintiff's termination or other adverse employment actions.

Employment

18. State whether any forms were required to be completed by an applicant for original hire, promotion, transfer, or any other change in the terms and conditions of employment at the Corporate Defendant(s), and if so, identify each form by name and number, describe its purpose, and provide a copy. Further, state whether any collective bargaining agreement was in effect during the period referenced in the Complaint that governed, influenced, or had any direct or indirect

effect on the hiring practices or procedures of the Corporate Defendant(s). Finally, with respect to the Plaintiff, provide the original date of hire, gross earnings or compensation for each year of employment from hire to present, all fringe benefits payable at the time of discharge—including, but not limited to, pension, welfare, health, retirement, savings, deferred compensation, bonus, and/or profit-sharing plans—and, if any benefit plans have changed since the time of discharge, describe all such changes.

Identification

19. Provide the full name, job title, duration of employment, last known address, last known telephone number, and last known e-mail for Pat Neira and Matt Zuckerman.

20. Describe the business relationship and corporate structure between Defendant Trump National and the Trump Organization.

Procedures & Policies

21. Identify and describe in detail Defendant(s)' policies, practices, and procedures relating to (a) employee complaints of discrimination, harassment, and/or retaliation, including any specific actions taken in response to such complaints, and (b) reprimanding, suspending, and terminating employees, including the steps followed during disciplinary actions and the criteria used to determine such actions. Additionally, identify and describe in detail Defendant(s)' policies, practices, and procedures for DOH compliance, including any relevant guidelines, restrictions, or limitations, and describe in full detail any investigations, determinations, and/or disciplinary actions taken by Defendant(s) related to any parties in this action in the past ten (10) years.

Investigation

22. 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.

23. 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.

HR & Training

24. Identify all persons employed by Defendant(s) who have been responsible for Human Resources, personnel matters, training, orientation, and personnel monitoring from the past five (5) years to the present, to the best of Defendant(s)' knowledge. For each individual identified, provide the dates of employment and their job titles. Additionally, provide the name, last known address, last known job title, and last known telephone number of each Equal Employment Opportunity (EEO) officer employed by Defendant(s) during the same period, and for each EEO officer, state the dates of their employment.

25. State whether any Defendant(s) participated in an orientation program upon their hiring with Defendant(s) and describe the system(s) or procedure(s) used for orientation in the past five (5) years. Identify and provide full details regarding any harassment and discrimination prevention training conducted by Defendant(s) within the same period, including the dates of such training, the materials used, and if provided by a third party, the third party's name, business address, and qualifications. Additionally, describe any sensitivity training or training related to appropriate workplace language and conduct received by any Defendant(s) during the relevant

time period.

Other Cases

26. Identify and describe in detail any and all lawsuits, claims, charges, arbitrations, investigations, inquiries, and/or proceedings, whether before state or federal courts, administrative agencies, commissions, boards, or departments—including but not limited to the U.S. Equal Employment Opportunity Commission, the New Jersey Department of Labor, and DOH—filed, charged, sought, or received against Defendant(s) in the past ten (10) years alleging harassment, discrimination, retaliation, or any employment-related matter. For each such Action, claim, notice, warning, investigation, or inquiry, provide the following information: (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, agency, or regulatory body where the Action was filed or investigated; (d) the docket number or reference number of the Action; (e) the date the Action was filed or the notice, warning, or inquiry was received; (f) the nature and substance of the Action, notice, warning, investigation, or inquiry; (g) the disposition or present status of the Action, notice, warning, investigation, or inquiry; (h) whether the Action 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.

Statement & Admissions

27. 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

28. State whether Defendant(s) or any of their agents communicated, orally or in writing, with any person or entity not a party to this litigation in connection with the subject matter of this lawsuit, and whether Defendant(s) ever taped or digitally recorded any communications with Plaintiff, whether face-to-face or telephonic. For all oral communications with non-parties, describe in detail the nature and substance of the communication, the date and place it occurred, and the names, last known addresses, and last known telephone numbers of all persons present. For all written communications with non-parties, provide true and accurate copies of each communication. For any communications with Plaintiff that were taped or digitally recorded, describe in detail: (a) the identity of each Defendant who recorded or participated in the recording; (b) the date, time, place, and manner of the recording; (c) the substance of the recorded communications; (d) the device used to make such recordings; and (e) whether consent to record was obtained. Produce any such recordings.

Trial & Experts

29. State the name, last known address, and last known telephone number of each person whom Defendant(s) may expect to call as a witness at trial and indicate the facts to which each such witness is expected to testify. Additionally, provide the names and business addresses of any proposed expert witnesses whom Defendant(s) have retained for this matter, and with respect to each expert witness, describe their field of expertise, educational background, writings, any opinions rendered, documents reviewed or created, and any tangible things upon which they may rely as an exhibit at trial.

30. Identify and describe any persons other than those named in the previous interrogatory, 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. For each such person, state their subject matter of consultation, field of expertise, qualifications, training, professional experience, and education, and provide any written reports, opinions, or documents relied upon in formulating those opinions, including a summary of the grounds for each opinion.

Damages

31. 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

32. State the name, last known address, and last known telephone number of each person who has knowledge of facts relating to this matter and specify the subject matter of each person's knowledge. Indicate whether the individual or individuals certifying these Interrogatory answers had the opportunity to review the typed responses, and if not, identify each person who provided information used to answer the questions and specify the numbers of the Interrogatories to which they contributed. Additionally, describe in detail the factual basis for each and every Affirmative Defense set forth in the Answer and the factual basis for each of Defendant(s)' denials of the allegations in the Complaint. State whether Defendant(s) know or believe there are any Documents related to the subject matter of this litigation that are not in Defendant(s)' possession,

custody, or control, and if so, identify each such Document, the source of Defendant(s)' information regarding its existence, and the person or entity in whose possession, custody, or control the Document is believed to be.

Job Comparators & Post Termination

33. Please identify each individual who replaced Plaintiff or performed any of her job duties, including the name, address, qualifications, and dates of employment for each individual. Additionally, state whether the individual who replaced Plaintiff or assumed her duties was pregnant at the time of replacement. Furthermore, identify all mediums, including newspapers, employment agencies, online websites, and job boards, that Corporate Defendant used to advertise available jobs during the Relevant Time Period and within one year following Plaintiff's termination.

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 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.
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
(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.

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

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;
 - and

- 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:

- 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; and
- 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:

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

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 Plaintiff, Justine Sacks

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

Dated: December 19, 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: _____

Christian V. McOmber, Esq. – NJ ID #012292010
 cvm@njlegal.com
 Peter D. Valenzano, Esq. – NJ ID #037892010
 pdv@njlegal.com
 Anna F. Esposito, Esq. – NJ ID #409612022
 afe@njlegal.com
 McOMBER McOMBER & LUBER, P.C.
 54 Shrewsbury Avenue
 Red Bank, NJ 07701
 (732) 842-6500 Phone
Attorneys for Plaintiff, Justine Sacks

<p>JUSTINE SACKS,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; DAVID SCHUTZENHOFER; RAUL SICOE; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MONMOUTH COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">NOTICE OF <u>R. 4: 14-2 (c)</u> VIDEO DEPOSITION OF CORPORATE DEFENDANT(S)</p>
--	--

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Justine Sacks, through her undersigned counsel, will take the deposition upon oral examination of the representative of Corporate Defendants **commencing on May 25, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

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

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

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Justine Sacks

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

Dated: December 19, 2025

Christian V. McOmber, Esq. – NJ ID #012292010
 cvm@njlegal.com
 Peter D. Valenzano, Esq. – NJ ID #037892010
 pdv@njlegal.com
 Anna F. Esposito, Esq. – NJ ID #409612022
 afe@njlegal.com
 McOMBER McOMBER & LUBER, P.C.
 54 Shrewsbury Avenue
 Red Bank, NJ 07701
 (732) 842-6500 Phone
Attorneys for Plaintiff, Justine Sacks

<p>JUSTINE SACKS,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; DAVID SCHUTZENHOFER; RAUL SICOE; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MONMOUTH COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">NOTICE OF <u>R. 4:14-2</u> AND <u>R. 4:14-9</u> VIDEO DEPOSITION OF DEFENDANT DAVID SCHUTZENHOFER</p>
--	---

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Justine Sacks, through her undersigned counsel, will take the deposition upon oral examination of Defendant Schutzenhofer **commencing on May 26, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

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

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

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Justine Sacks

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

Dated: December 19, 2025

Christian V. McOmber, Esq. – NJ ID #012292010
 cvm@njlegal.com
 Peter D. Valenzano, Esq. – NJ ID #037892010
 pdv@njlegal.com
 Anna F. Esposito, Esq. – NJ ID #409612022
 afe@njlegal.com
 McOMBER McOMBER & LUBER, P.C.
 54 Shrewsbury Avenue
 Red Bank, NJ 07701
 (732) 842-6500 Phone
Attorneys for Plaintiff, Justine Sacks

<p>JUSTINE SACKS,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; DAVID SCHUTZENHOFER; RAUL SICOE; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MONMOUTH COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">NOTICE OF <u>R. 4:14-2</u> AND <u>R. 4:14-9</u> VIDEO DEPOSITION OF DEFENDANT RAUL SICOE</p>
--	--

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Justine Sacks, through her undersigned counsel, will take the deposition upon oral examination of Defendant Sicoe **commencing on May 27, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Lubner, P.C.

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

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

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Justine Sacks

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

Dated: December 19, 2025

Civil Case Information Statement

Case Details: MONMOUTH | Civil Part Docket# L-004554-25

Case Caption: SACKS JUSTINE VS LAMINGTON FARM CLUB, LLC

Case Initiation Date: 12/19/2025

Attorney Name: PETER DOUGLAS VALENZANO

Firm Name: MCOMBER MCOMBER & LUBER, PC

Address: 54 SHREWSBURY AVE

RED BANK NJ 07701

Phone: 7328426500

Name of Party: PLAINTIFF : Justine Sacks

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: Justine Sacks? 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)*

12/19/2025
Dated

/s/ PETER DOUGLAS VALENZANO
Signed

