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Attorneys for Plaintiffs, S.W., as the parent and natural guardian of J.W.

S.W., as the parent and natural guardian of J.W., Plaintiffs, v. LAKEVIEW LEARNING CENTER, INC.; RAYSHAWN CHRISTIAN; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals); Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION PASSAIC COUNTY DOCKET NO.: <u>Civil Action</u> COMPLAINT & DEMAND FOR TRIAL BY JURY; FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS
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Plaintiffs, S.W. (“Plaintiff S.W.”), as the parent and natural guardian of Minor J.W. (“Minor Plaintiff J.W.”), (collectively “Plaintiffs”), by way of Complaint against Defendant Lakeview Learning Center, Inc. (“Defendant Lakeview”), Defendants ABC Corporations 1-5 (fictitious names describing presently unidentified business entities) (along with “Defendant Lakeview,” collectively referred to as “Corporate Defendants”), Defendant Rayshawn Christian (“Defendant Christian”), and Defendants John Does 1-5 (fictitious names describing presently unidentified individuals) (along with “Defendant Christian,” collectively referred to as “Individual Defendants”) (all collectively “Defendants”) alleges as follows:

PRELIMINARY STATEMENT

School is a place for students to not only learn an academic curriculum but should also serve as an environment for children to cultivate confidence and engage in meaningful social interaction. It is therefore incumbent upon teachers, administrators, and staff to facilitate a positive and inclusive social setting where students feel safe at all times. In this case, however, Defendant Lakeview's administration and teachers completely and utterly abdicated these responsibilities by permitting one of their own students to fall victim to a violent and vicious attack by another student.

On May 19, 2025, while Minor Plaintiff J.W.—then fourteen-years-old—was eating lunch in Defendant Lakeview's cafeteria, eighteen-year-old Defendant Christian suddenly approached Minor Plaintiff J.W. and initiated a verbal altercation. Said verbal altercation soon became physical as Defendant Christian viciously attacked Minor Plaintiff J.W. In the middle of Defendant Christian's attack on Minor Plaintiff J.W., and without any Defendant Lakeview staff stepping in to stop Defendant Christian's attack on Minor Plaintiff J.W., Defendant Christian pulled out his pocketknife, deployed the blade, and proceeded to stab Minor Plaintiff J.W. several times all over his body.

Minor Plaintiff J.W. was, in turn, rushed to the hospital, where he remained for the next month, undergoing several surgeries to treat his injuries, which included stab wounds near his heart requiring blood draining, a cut on his stomach requiring staples, and multiple cuts on his arms and chest requiring stitches. Despite several members of Defendant Lakeview's staff being present during lunch that day, no one intervened to stop Defendant Christian in his vicious attack until after Minor Plaintiff J.W. had already sustained several stab wounds and was severely bleeding. Now, and as a direct result of said trauma, Minor Plaintiff J.W. is experiencing severe and lasting

emotional distress, to go along with his significant physical injuries, which has left him terrified of returning to Defendant Lakeview and left him with no alternative but to attend homeschooling.

In allowing the aforementioned events of May 19, 2025, to transpire, Defendants were grossly negligent and reckless in permitting Minor Plaintiff J.W. to be subjected to such a violent attack. Accordingly, Plaintiffs bring the instant action to assert Minor Plaintiff J.W.'s basic right to attend school in a safe environment.

PARTIES

1. Plaintiff S.W. is an individual currently residing in Paterson, New Jersey. At all times relevant herein, Plaintiff S.W. is the legal guardian of Minor Plaintiff J.W.

2. Minor Plaintiff J.W. is a minor currently residing in Paterson, New Jersey. Minor Plaintiff J.W. is presently a fifteen (15)-year-old male, and at all times relevant hereto, was fourteen (14)-years-old and a student at Defendant Lakeview.

3. Defendant Lakeview is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 970 Black Oak Ridge Road, Wayne, New Jersey 07470. According to its website, Defendant Lakeview "is an alternative therapeutic private special education school approved through the NJ Department of Education that accepts middle and high school students with behavioral, emotional, and/or learning disabilities such as ADD, ADHD, Aspergers/high functioning autism, anxiety, bipolar disorder and psychiatric/mood disorders." At all times relevant hereto, Defendant Lakeview operates the school (also referred to herein as the "School") located at 18 Van Duyne Avenue, Wayne, New Jersey 07470. At all times relevant hereto, Minor Plaintiff J.W. and Defendant Christian were students at Defendant Lakeview's School.

4. Upon information and belief, Defendant Christian, at all times relevant hereto, was an eighteen (18)-year-old student attending Defendant Lakeview. Upon information and belief, Defendant Christian is a domiciliary of Elizabeth, New Jersey. This claim is brought against Defendant Christian in his individual capacity.

5. Defendants ABC Corporations 1-5 are currently unidentified business entities that have acted in concert with Defendants and/or are currently unidentified business entities responsible for the creation and/or implementation of school policies of Corporate Defendants and/or currently unidentified business entities that have liability for the damages suffered by Plaintiffs under any theory advanced herein.

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

FACTS COMMON TO ALL CLAIMS

7. Minor Plaintiff J.W. is currently the fifteen (15)-year-old son of Plaintiff S.W.

8. During the 2024-2025 school year, Minor Plaintiff J.W. was fourteen (14)-years-old and a student at Defendant Lakeview Learning Center (i.e., the “School”).

9. On or about May 19, 2025, Minor Plaintiff J.W. was eating lunch in the cafeteria of the School.

10. During lunch, Defendant Christian, a then-eighteen (18)-year-old student at the School, approached Minor Plaintiff J.W. and began shouting at him.

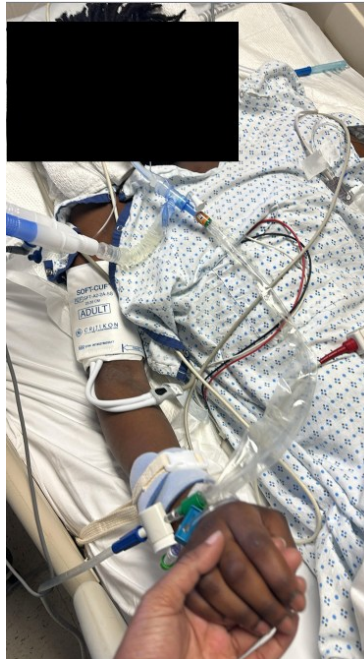
11. Before long, Defendant Christian then brutally and physically attacked Minor Plaintiff J.W., who tried to avoid injury and get Defendant Christian to leave him alone prior to said attack.

12. During Defendant Christian's attack of Minor Plaintiff J.W., Defendant Christian pulled out a sharp pocketknife and violently stabbed Minor Plaintiff J.W. several times in the heart, arm, abdomen, and side of the abdomen.

13. Shockingly, and despite there being several members of Defendant Lakeview staff present throughout Defendant Christian's brutal attack of Minor Plaintiff J.W., including a lunch monitor/cook by the name of Mr. Anderson, no one took any action to interfere with and/or stop Defendant Christian's vicious attack of Minor Plaintiff J.W. from further escalating or to protect Minor Plaintiff J.W., even after he was visibly bleeding from several stab wounds inflicted by Defendant Christian.

14. After several minutes, Defendant Christian finally backed away from Minor Plaintiff J.W., at which time Minor Plaintiff J.W. was able to extract himself from Defendant Christian's ire and head directly to School's nurse. Notably, Minor Plaintiff J.W. had to do so without any escort or assistance from Defendant Lakeview staff members.

15. From the nurse's office, Minor Plaintiff J.W. was immediately transported to St. Joseph's University Medical Center in Paterson, New Jersey, where he underwent several surgeries for his injuries and, thereafter, was in-and-out of the hospital repeatedly over the span of one (1) month. A photograph of Minor Plaintiff J.W. in the hospital is included below:



16. Indeed, Minor Plaintiff J.W. underwent intensive treatment for stab wounds near his heart requiring blood draining, a cut on his stomach requiring staples, and multiple cuts on his arms and chest requiring stitches.

17. As a direct result of Defendant Lakeview's gross negligence and recklessness, Defendant Christian was permitted to violently assault and repeatedly stab Minor Plaintiff J.W. while at the School on the date in question.

18. Even worse, a friend of Defendant Christian who also attended the School during the incident in question proceeded to humiliate Minor Plaintiff J.W. on Instagram, ***posting photographs of Minor Plaintiff J.W. being brought out of the School on a stretcher alongside disturbing text which bragged: [Minor Plaintiff J.W.] "was talkin allat shii know look u!! left on a stretcher told u stop playin."***

19. Taking it one step further, ***the same individual, under the Instagram handle k._groove, posted several photographs of guns with ominous threats to Minor Plaintiff J.W.***

20. Since the incident and the humiliating bullying that followed, Minor Plaintiff J.W. has been terrified of returning to the School and forced to instead attend homeschooling.

21. As a direct result of Defendant Lakeview's unlawful conduct, Minor Plaintiff J.W. has, and continues to, experience severe emotional distress due to the May 19, 2025, incident. In that regard, and in addition to residual effects stemming from the serious and permanent physical injuries sustained by Minor Plaintiff J.W. due to Defendant Christian's vicious attack on him on May 19, 2025, Minor Plaintiff J.W. still experiences periods of anxiousness and no longer wants to attend Defendant Lakeview, or any other school, and exhibits diminished self-esteem and symptoms of depression due to same.

COUNT ONE

NEGLIGENCE

(As to Defendant Lakeview)

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

23. Defendant Lakeview supervised, cared for, and/or controlled the conduct of its employees during the school day at Defendant Lakeview.

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

25. Notwithstanding said duty, Defendant Lakeview, by and through its agents, servants, and employees, carelessly, negligently, and recklessly supervised its staff.

26. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendant Lakeview as aforesaid, Plaintiffs were damaged. Plaintiffs have suffered and will continue to suffer severe physical injuries and mental anguish in the future.

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

COUNT TWO

NEGLIGENCE
(As to Defendant Christian)

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

28. Defendant Lakeview supervised, cared for, and/or controlled the conduct of students during the school day at Defendant Lakeview's School.

29. The aforementioned actions of Defendant Christian constitute negligence.

30. As a result of the negligence of Defendant Christian, Plaintiffs were damaged. Plaintiffs have suffered and will continue to suffer physical injuries and severe mental anguish in the future.

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

COUNT THREE

NEGLIGENT SUPERVISION
(As to Defendant Lakeview)

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

32. Defendants' negligence, gross negligence, reckless conduct, and supervision of Defendant Christian caused Minor Plaintiff J.W. to be violently attacked, assaulted, and battered while at school.

33. Defendants' negligent supervision of Defendant Christian directly and proximately caused Minor Plaintiff J.W. severe physical and emotional distress damages.

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

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

COUNT FOUR

NEGLIGENT TRAINING **(As to Defendant Lakeview)**

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

36. Defendant Lakeview's negligence, gross negligence, reckless conduct, and training of Defendant Lakeview's employees and supervisors directly and proximately caused Minor Plaintiff J.W. to be violently attacked, assaulted, and battered while at school by Defendant Christian.

37. Defendant Lakeview's negligent training of its employees and administrative staff directly and proximately caused Minor Plaintiff J.W. severe physical and emotional distress damages.

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

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

COUNT FIVE

ASSAULT
(As to Defendant Christian)

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

40. By engaging in the actions on May 19, 2025, Defendant Christian intended to cause and did cause Minor Plaintiff J.W. to suffer apprehension of an immediate harmful contact.

41. On account of the conduct of Defendant Christian, Plaintiffs have been injured.

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

COUNT SIX

BATTERY
(As to Defendant Christian)

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

43. By engaging in the actions on May 19, 2025, Defendant Christian intended to cause and did cause Minor Plaintiff J.W. to suffer a harmful and offensive touching.

44. On account of the conduct of Defendant Christian, Plaintiffs have been injured.

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

COUNT SEVEN

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

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

46. Defendants Lakeview and Christian, through the course of conduct set forth above, intentionally or recklessly committed acts of omissions producing emotional distress to Plaintiffs.

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

48. As a proximate result of said conduct, Plaintiffs have suffered emotional distress so severe that no reasonable person could be expected to endure same.

49. On account of the conduct of Defendants Lakeview and Christian, Plaintiffs have been injured.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants Lakeview and Christian on this Count, together with compensatory and equitable relief, punitive

damages, pre- and post-judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

COUNT EIGHT

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

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

51. Defendants owed a duty to Plaintiffs to act as reasonable, prudent people. This duty includes an obligation to act in a careful, lawful, and prudent manner and in full compliance with applicable law.

52. Defendants' conduct toward Plaintiffs resulted in a breach of their duties to act as reasonable, prudent people.

53. Emotional distress was a field of danger that Defendants Lakeview and Christian should reasonably have anticipated and guarded against.

54. As a result of Defendants Lakeview and Christian's breach of their duties, Plaintiffs suffered legally compensable emotional distress damages.

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

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

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

be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide Plaintiffs' attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary insurance coverage, but also any excess, catastrophe, and umbrella policies.

DEMAND FOR TRIAL BY JURY

Plaintiffs demand a trial by jury on all issues.

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, S.W., as the parent and
 natural guardian of J.W.*

By: /s/ Austin B. Tobin
 AUSTIN B. TOBIN, ESQ.

Dated: July 24, 2026

DESIGNATION OF TRIAL COUNSEL

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

CERTIFICATION

Pursuant to Rule 4:25-1, it is hereby certified that, to the best of my knowledge, there are no other civil actions or arbitration proceedings with respect to this matter and no other parties need to be joined at this time.

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

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, S.W., as the parent and
 natural guardian of J.W.*

By: /s/ Austin B. Tobin
 AUSTIN B. TOBIN, ESQ.

Dated: July 24, 2026

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S.W., as the parent and natural guardian of J.W., Plaintiffs, v. LAKEVIEW LEARNING CENTER, INC.; RAYSHAWN CHRISTIAN; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals); Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION PASSAIC COUNTY DOCKET NO.: <u>Civil Action</u> FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS
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**FIRST SET OF DOCUMENT REQUESTS, INTERROGATORIES, AND PUNITIVE
DAMAGES**

PLEASE TAKE NOTICE that, McOmber McOmber & Luber, P.C., attorneys for Plaintiffs, S.W. (“Plaintiff S.W.”) as the parent and natural guardian of Minor J.W. (“Minor Plaintiff J.W.”) (collectively “Plaintiffs”), demand that Defendants Lakeview Learning Center, Inc. and Rayshawn Christian (collectively, “Defendants”) produce true and complete copies of the following Document Requests and answer under oath the following Interrogatories pursuant to the Rules of Court. Interrogatory answers shall be typed beneath the questions and the original shall be returned in accordance with Rule 4:17-4(c) and, if at any time prior to trial, you obtain

information which renders any answer you provide incomplete or inaccurate, amended answers shall be served pursuant to Rule 4:17-7. Both the Document Request and Interrogatories shall be continuing so as to require supplemental responses and/or answers if Defendant(s) obtain(s) further documents or information between the time the response is served and the time of trial/hearing.

DEFINITIONS

1. “Plaintiffs” 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. “Plaintiff S.W.” shall mean S.W., as the parent and natural guardian of Minor Plaintiff J.W., Plaintiff in the above-captioned action.

3. “Plaintiff J.W.” shall mean Minor Plaintiff J.W., Plaintiff in the above-captioned action.

4. “Defendant Lakeview” shall mean Lakeview Learning Center, Inc., and any of its officers, directors, employees, agents, representatives, successors, predecessors, assigns, divisions, affiliates, subsidiaries, and all persons acting or purporting to act on its behalf.

5. “Defendant Christian” shall mean Rayshawn Christian, Defendant in the above-captioned action.

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

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

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

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

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

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

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

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

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

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

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

17. “Document” or “documents” is defined in accordance with New Jersey Court Rule 4:18-1 and includes the original and any identical or non-identical copy, regardless of origin or location, of any written, reported, filmed, magnetically stored, or graphic matter, or record of any type or description, whether produced, reproduced, or producible on paper, cards, tapes, film, electronic facsimile, computer storage devices, or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, computer programs, correspondence, telegrams, diaries, bookkeeping entries, specifications, source code, object code, flow charts, financial statements, charts, studies, reports, graphs, statements, notebooks, handwritten notes, application, feasibility studies, agreements, books, pamphlets, periodicals, appointment calendars, notes, records and recordings of oral conversations or voicemails, emails, inter-office or intra-office communications, handwritten or other notices, diaries, invoices, purchase orders, bills of lading, work papers, and also including, but not limited to, originals and all copies which are different from the original, whether by interlineation, receipt stamp, notation, indication of copy sent or received, or otherwise, and drafts, which are in the possession, custody or control of the present or former agents, representatives, employees, or attorneys of Defendant(s), or all persons acting on Defendant(s)’ behalf, including documents at any time in the possession, custody or control of such Individuals or entities who are known by Defendant(s) to exist. Include any catalog, brochure, or any other data compilations from which information can be obtained and translated if necessary, or any other written, recorded, stored, transcribed, punched, taped, filed or graphic matter however produced or reproduced, to which Defendant(s) have or have had access.

18. The term “communication” means any conversation, correspondence, discussion, meeting, message, record of phone calls, or other occurrence in which data, conclusions,

information, opinions, or thoughts are exchanged between two or more persons, whether it be written, oral, or electronically transmitted.

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

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

21. The term “concerning” means concerning, comprising, constituting, containing, commenting on, dealing with, describing, discussing, embodying, evidencing, illustrating, pertaining to, referring to, reflecting, regarding, relating to, responding to, stating, or supporting in any way, either directly or indirectly.

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

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

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

INSTRUCTIONS

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

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

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

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

5. If anyone identified in response to any of the Document Requests and/or Interrogatories was formerly, but is no longer, employed by you, please so state in the answer and provide the former employee’s current address and telephone number (business or home), if known. If the current address and telephone number are not known, then please provide the former employee’s last known address and telephone number.

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

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

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

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

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

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

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

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

14. Whenever a claim of privilege concerns any oral communication or statement, identify the participants to the communication and the person giving and receiving the statement,

set forth the date and place of the communication or statement, state the general subject matter thereof, and state the basis for the claim of privilege.

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

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

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

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

McDonough v. Jorda, 214 N.J. Super. 338, 349 (1986), certif. denied, 110 N.J. 302 (1988) cert. denied, 489 U.S. 1065 (1989).

DOCUMENT REQUESTS TO DEFENDANT(S)

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

2. A complete copy of the student file Defendant(s) maintained pertaining to Plaintiff J.W., including, but not limited to, copies of documents (written or electronic) relating to the following: (a) academic records; (b) attendance and sick day records; (c) medical records and reports; (d) disciplinary records, if any.

3. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any Individual Defendant, including, but not limited to, copies of documents (written or electronic) relating to the following: (a) academic records; (b) attendance and sick day records; (c) medical records and reports; (d) disciplinary records, if any, for any Individual Defendant.

4. All statements, documents, or communications relating to any complaints made by the Plaintiffs.

5. Produce a copy of Defendant(s)' written policy concerning student disciplinary policies.

6. Produce a copy of Defendant(s)' written policy concerning supervision of students while on school property.

7. Produce a copy of Defendant(s)' written policy concerning supervision of students during active school hours.

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

9. All statements, documents, or communications relating to anti-harassment training or education completed by Defendant(s).

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

11. A copy of all documents (written or electronic) relating to each and every instance since January 01, 2016, in which an allegation was made and/or a lawsuit filed alleging that Defendant(s) engaged in negligent acts and/or negligent supervision of students. For each and every such instance, identify the person(s) who made the allegation, the person(s) against whom the allegation was made, the date of the behavior complained of, the date the complaint was made, the nature of the behavior complained of, and how, if any way, you investigated, handled, processed, and/or ultimately disposed of each and every such matter.

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

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

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

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

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

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

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

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

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

21. All statements, documents, or communications relating to any incident reports by the Plaintiffs in this matter.

22. All statements, documents, or communications relating to any Grievance made by Plaintiffs in this matter concerning Individual Defendant(s).

23. All statements, documents, or communications relating to any Grievance made by a student, parent, or employee of Defendant Lakeview concerning Individual Defendant(s).

24. All statements, documents, or communications relating to any Investigation by Defendant Lakeview relating to any Grievances filed against Individual Defendant(s).

25. A copy of the employee and/or student handbook in force and effect at the time of the Plaintiff(s) in this matter attended Corporate Defendant(s).

26. All statements, documents, or communications relating to the employee and/or student handbook in force and effect at the time Plaintiff J.W. attended Corporate Defendant(s).

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

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

29. All reports (including drafts) relating to any Investigation concerning Defendant(s) and/or Plaintiffs.

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

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

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

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

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

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

36. All documents relating to Plaintiff J.W.'s enrollment at Corporate Defendant(s).

37. All documents or electronic data relating, reflecting, or referring to Defendant(s) ability to restore archived electronic data relating to Plaintiff J.W.'s academic and disciplinary records contained on electronic media such that upon restoration it may be accessed, viewed, exported, or printed.

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

39. All statements, documents, or communications concerning Defendant(s) receiving any training regarding appropriate workplace conduct.

40. All statements, documents, or communications concerning any remedial actions taken in response to Plaintiffs' complaints.

41. All statements or documents concerning any communications between Individual Defendants and Corporate Defendants regarding the harassment of Plaintiff J.W.

42. All statements, documents, or communications concerning any measures taken by Defendant Lakeview to protect Plaintiff J.W. from Defendant Christian during the 2024-2025 school year.

INTERROGATORIES TO DEFENDANT(S)

1. Identify each Person answering these Interrogatories by stating his or her:
 - a. full name;
 - b. address,
 - c. title and relationship to the party upon whom these Interrogatories were served;
 - d. his/her duties and responsibilities with the party upon whom these Interrogatories were served;
 - e. the date when the employment of the person answering these Interrogatories commenced;
 - f. the date upon which these Interrogatories were answered; and
 - g. whether you read and complied with the general instructions and definitions set forth in these Interrogatories. (If not, explain in detail exactly how you failed to comply with these directions.)
2. Indicate whether the individual or individuals certifying these Interrogatory answers had the opportunity to review the typed responses.

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

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

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

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

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

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

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

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

9. State the full name of each faculty member that worked with or oversaw Plaintiff J.W. throughout his enrollment during the 2024-2025 school year.

10. 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.

11. 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.

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

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

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

14. Identify and provide full details concerning all supervisory training conducted by Defendant(s) in the past five (5) years.

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

16. State whether any civil or criminal actions have ever been filed charging Defendant(s) with harassment and/or negligence in the past ten (10) years. This includes, but is

not limited to, all judicial, administration, and/or arbitration hearings. If so, provide the following for each such action:

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

17. Please describe in detail complaints or Grievances (formal or otherwise) made by the Plaintiffs with regard to negligent supervision of students and/or Defendant(s).

18. Please describe in detail complaints or Grievances (formal or otherwise) made by any student or parents with regard to negligent supervision of students and/or Defendant(s) in the past ten (10) years.

19. Describe, in detail, the investigation, determination and/or disciplinary actions taken by Defendant(s) relating to all complaints or Grievances of negligence and/or harassment by Defendant(s) in the past ten (10) years.

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

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

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

23. Have any admissions been made by party or parties propounding these Interrogatories, or any of his/her/its/their agents, servants, or representatives concerning the subject matter of this litigation? If the answer to this Interrogatory is in the affirmative, set forth in detail the following:

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

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

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

25. 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.

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

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

28. 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.

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

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

known telephone numbers of all persons present. For all such communications that were written, provide true and accurate copies of each such communication.

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

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

32. Describe in detail Defendant(s)' ability to restore archived electronic data relating to the Plaintiff J.W.'s student records at Defendant Lakeview contained on electronic media such that upon restoration it may be accessed, viewed, exported, or printed.

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

34. Identify each Individual with knowledge of:

- a. The type and location of all hardware used as terminals for email, including servers, personal computers, laptops, PDAs, etc. at Corporate Defendant(s) between January 1, 2016 and the present;
- b. Computer software operating systems and end user-applications servicing Corporate Defendant(s) between January 1, 2016 and the present;
- c. All email software and versions which have been used on hardware servicing Corporate Defendant(s) between January 1, 2016 and the present;
- d. The email file naming conventions and standards;
- e. The back-up and rotation schedules for all email generated or received by Corporate Defendant(s)' employees between January 1, 2016 and the present;
- f. Electronic data retention, preservation and destruction policies;
- g. Diskette, CD, DVD and other removable media labeling standards;

- h. Structure and organization of all information and technology departments and/or information technology support vendors involved with the computer systems at Corporate Defendant(s);
- i. The location of the email produced in response to Plaintiffs' First Request for Production;
- j. The method of search for the documents and electronic data requested in Plaintiffs' First Request for Production; and
- k. The date and time of destruction of any electronic data requested in Plaintiffs' First Request for Production.

35. Identify and describe in full detail Defendant(s)' policy relating to students' or parents' complaints of negligent supervision.

36. Describe, in detail, any investigation, determination, and/or disciplinary actions taken by Defendant(s) relating to any of the parties in this action in the past five (5) years.

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

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

39. Identify and describe in detail Defendant(s)' procedure and/or policy for reprimanding students if issues arose within the classroom.

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

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

42. Describe, in full detail, the facts and circumstances that relate to any disciplinary action taken against Defendant Christian during his enrollment in Defendant Lakeview.

43. Describe, in full detail, the facts and circumstances that relate to any investigation conducted by Defendant Lakeview in regard to Plaintiffs' complaints.

44. Describe, in full detail, the facts and circumstances that relate to any remedial actions taken in response to Plaintiffs' complaints.

45. Describe, in full detail, Defendant Lakeview's policy for alerting parents of discipline taken against students while in the care of Defendants.

INTERROGATORIES TO INDIVIDUAL DEFENDANT(S) ONLY

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

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

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

3. Identify all cell phone numbers used by Defendant(s) for the past five (5) years as well as carrier and current location of each cell phone. For any such cell phones that are no longer

in Individual Defendant(s)' possession, please identify the name and address of the person's whose possession they are in.

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

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

DOCUMENT REQUESTS RELATED TO PUNITIVE DAMAGES

1. All financial statements prepared for the years 2016 through 2026, up to and including the present, setting forth income, expenses, assets, liabilities, and profits of the Corporate Defendant(s).

2. All tax returns filed by the Corporate Defendant(s) for the years 2016 through 2026, up to and including the present.

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

4. All documents evidencing the Corporate Defendant(s)' interest in any real estate.

5. All documents evidencing the financial obligations of the Corporate Defendant(s) and all payments on those obligations.

6. All documents evidencing judgments against the Corporate Defendant(s) and the amount of those judgments for the years 2016 through 2026, up to and including the present.

7. All documents evidencing bank accounts held by the Corporate Defendant(s), the location of those accounts, account numbers, and balances of those accounts.

8. All documents evidencing or setting forth accounts receivable and/or obligation owed by others to the Corporate Defendant(s) for the years 2016 through 2026, up to and including the present.

9. All documents evidencing payments made by the Corporate Defendant(s) to creditors.

10. All corporate books or any other written memorandum setting forth income received by the Corporate Defendant(s).

11. All copies of inventories taken by the Corporate Defendant(s) of its property at any time during the years 2016 through 2026, up to and including the present.

INTERROGATORIES RELATED TO PUNITIVE DAMAGES FOR DEFENDANT(S)

1. If the Defendant(s) is a corporation, set forth as to each:
 - a. The full name of the corporation;
 - b. Date of incorporation;
 - c. State of incorporation;
 - d. All States in which the Defendant(s) conducts its business;
 - e. All States in which the Defendants has registered to do business;
 - f. The full and correct names and residential address of all stockholders for the last two (2) years;
 - g. The number of shares issued to each of the said stockholders and directors of the corporation during the past two (2) years to include specific dates during which said individuals served as directors;
 - h. Number of shares issued to each of said stockholders;
 - i. The full and correct names and addresses of all officers of the corporation during the past two (2) years to include the specific dates during which said individuals served as officers;
 - j. All trade or fictitious names under which the corporation has conducted its business in the past two (2) years;
 - k. The complete street address of all locations where the Defendant(s) has conducted its business in the past two (2) years and include the specific dates during which it was at each location; and
 - l. The name and address of the person who has custody of this corporation's books and records.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- a. Make, model, and year;
- b. License plate number;
- c. Vehicle identification number; 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 all accounts receivable due to the Defendant(s), stating the name, address, and amount due on each receivable.

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

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

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

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

e. Docket number.

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, S.W., as the parent and
natural guardian of J.W.*

By: /s/ Austin B. Tobin

AUSTIN B. TOBIN, ESQ.

Dated: July 24, 2026

CERTIFICATION

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

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

Dated: _____, 2026

By: _____

CERTIFICATION

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

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

Dated: _____, 2026

By: _____

R. Armen McOmber, Esq. – NJ ID #018251998

ram@njlegal.com

Austin B. Tobin, Esq. – NJ ID #002622010

abt@njlegal.com

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Red Bank, NJ 07701

(732) 842-6500 Phone

Attorneys for Plaintiffs, S.W., as the parent and natural guardian of J.W.

S.W., as the parent and natural guardian of J.W., Plaintiffs, v. LAKEVIEW LEARNING CENTER, INC.; RAYSHAWN CHRISTIAN; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals); Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION PASSAIC COUNTY DOCKET NO.: <u>Civil Action</u> <u>NOTICE OF R. 4:14-2(c) VIDEO DEPOSITION OF CORPORATE DEFENDANT(S)</u>
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NOTICE OF R. 4:14-2(c) VIDEO DEPOSITION OF CORPORATE DEFENDANT(S)

PLEASE TAKE NOTICE that pursuant to Rule 4:14-2(c) of the New Jersey Rules of Court, Plaintiffs, S.W., as the parent and natural guardian of J.W., through their undersigned counsel, will take the deposition upon oral examination of the corporate representative of Defendant Lakeview Learning Centers, Inc., **commencing on Monday, November 16, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C. Defendant Lakeview is required to designate and produce for deposition a person or persons to testify on its behalf.

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

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

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, S.W., as the parent and
natural guardian of J.W.*

By: /s/ Austin B. Tobin
AUSTIN B. TOBIN, ESQ.

Dated: July 24, 2026

R. Armen McOmber, Esq. – NJ ID #018251998

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Austin B. Tobin, Esq. – NJ ID #002622010

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Attorneys for Plaintiffs, S.W., as the parent and natural guardian of J.W.

S.W., as the parent and natural guardian of J.W., Plaintiffs, v. LAKEVIEW LEARNING CENTER, INC.; RAYSHAWN CHRISTIAN; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals); Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION PASSAIC COUNTY DOCKET NO.: <u>Civil Action</u> <u>NOTICE OF R. 4:14-2 AND R. 4:14-9</u> <u>VIDEO DEPOSITION</u>
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NOTICE OF R. 4:14-2 AND R. 4:14-9 VIDEO DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rule 4:14-2(c) of the New Jersey Rules of Court, Plaintiffs, S.W., as the parent and natural guardian of J.W., through their undersigned counsel, will take the deposition upon oral examination of Defendant Rayshawn Christian, Inc., **commencing on Monday, November 16, 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 Plaintiffs, S.W., as the parent and
natural guardian of J.W.*

By: /s/ Austin B. Tobin
AUSTIN B. TOBIN, ESQ.

Dated: July 24, 2026

Civil Case Information Statement

Case Details: PASSAIC | Civil Part Docket# L-002575-26

Case Caption: W. S. VS LAKEVIEW LEARNING CE NTER, INC

Case Initiation Date: 07/24/2026

Attorney Name: AUSTIN B TOBIN

Firm Name: MCOMBER MCOMBER & LUBER, PC

Address: 54 SHREWSBURY AVE

RED BANK NJ 07701

Phone: 7328426500

Name of Party: PLAINTIFF : S. W.

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: TORT-OTHER

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: S. W.? NO

Are sexual abuse claims alleged by: J. W.? 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: Other(explain) School/Student

Does the statute governing this case provide for payment of fees by the losing party? NO

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)*

07/24/2026

Dated

/s/ AUSTIN B TOBIN

Signed

