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Superior Court of New Jersey

JUN 05 2006

CIVIL CASE MANAGEMENT
UNION COUNTY

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ERIC S. LENTZ, ESQ.
383 MAIN STREET
CHATHAM, NEW JERSEY
(973) 635-2210
Attorneys for Plaintiffs

PATRICIA (Riordan)McCLOUD , Individually
And as Administratrix of the Estate of her
brother, Adrian Riordan

Plaintiffs,

vs.

COUNTY OF UNION, UNION COUNTY
PARATRANSIT DEPT. OF HUMAN
SERVICES, SONIA CHAVANNE , JOHN/JANE
DOES 1-20 (fictitious persons), and ABC
Companies (1-50 fictitious)

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY
Docket No.

UNN-L-2082 06
Civil Action

COMPLAINT AND JURY DEMAND

2082

Plaintiff, Patricia McCloud, Individually and as Administratrix of the Estate of Adrian Riordan, by way of Complaint, against the Defendants, say:

FIRST COUNT

1. On or about June 4, 2004, the Plaintiff, decedent Adrian Rordan was a resident at 520 Central Avenue, Plainfield, New Jersey

2. Plaintiff Patricia McCloud has been appointed as the Administratrix of the Estate of Adrian Riordan. The decedent was the brother of the plaintiff.

3. Defendant Sonia Chavanne, and John/Jane Doe 1-5 were agent(s), servant(s) and or employee(s) of the County of Union, Union County Paratransit, Department of Human Services; and/or ABC COMPANIES 1-10.

4. The defendant Union County, and the Union County ParaTransit, Department of Human Services, and ABC Companies 1-50 (fictitiously named) owned a "1996 Ford Bus, Reg number K681CG (N.J.) and by their employees John/Jane Doe 6-20 negligently maintained and serviced the bus.

5. On or about June 4, 2004, the defendant Sonia Chavanne and John/Jane Doe 1-5 operated the "1996 Bus" in a negligent, careless and or reckless manner.

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6. On or about June 4, 2004, the decedent was a passenger on the aforementioned Ford Bus.

7. On or about June 4, 2004, the defendant Sonia Chavanne and John/Jane Doe 1-20 failed to supervise, monitor, that the decedent was belted, and/or failed to inspect, repair, and maintain the rear door of the bus in proper working and/or mechanical order in a closed and locked position.

8. At or about the intersection of Amsterdam and Myrtle Street, Roselle, New Jersey, plaintiff decedent, who was a passenger in the aforementioned vehicle was discovered on the road way.

9. Defendant Sonia Chavanne and John/Jane Doe 1-20, prior to the discovery of the decedent, was operating the aforesaid vehicle in a northerly direction on Myrtle Street.

10. Defendant Sonia Chavanne and John/Jane Doe 1-20 were oblivious to the fact that the decedent had fallen, or was ejected from the rear door, until approximately one block down the road.

11. As a direct and proximate result of the negligence of the Defendants jointly, and severally Adrian Riordan deceased, was caused grievous bodily injuries causing pain and suffering and ultimate death. The aforementioned injuries and damage was a foreseeable consequence of the Defendants, carelessness, negligence and recklessness

12. As a result of the aforementioned negligence of the defendants, any or all of them, the Estate of Adrian Riordan has incurred medical bills, and other pecuniary loses.

13. As a result of the negligence, careless, and recklessness of the defendant(s) the plaintiff decedent Adrian Riordan prior to his death, suffered severe and permanent injuries, severe pain, and loss of life's enjoyment.

14. Plaintiffs have complied with the provisions of N.J.S.A 2A:31-1et seq of the Wrongful Death Act of the State of New Jersey, with the provisions of N.J.S.A.2A:15-3 (Survivors Actions), and the Notice Requirement provision of the Tort Claim Act.

15. Although suffering from a pre-existing mental and physical ailment, the decedent provided emotional support to the extent he was able to his family.

16. The Estate of the decedent was liable for hospital, medical, funeral and burial expenses and charges of the decedent.

WHEREFORE, Plaintiffs demand Judgment against the Defendants, individually, concurrently, jointly and severally, for damages together with interest, costs of suit, attorneys' fees, and such other and further relief as the Court may deem just and equitable.

JURY DEMAND

TAKE NOTICE that plaintiff demands that the issues herein be tried by a jury.

DEMAND FOR PLEADINGS/DISCOVERY

TAKE NOTICE that the undersigned attorney(s), counsel for the Plaintiff(s), hereby demands pursuant to Rules 1:5-1(a); 4:17-2(b)(i) and 4:17-4(c), that each party herein provide any and all such pleadings and answered Interrogatories received from any party including any documents, papers and other materials referred to herein, upon the undersigned attorney, and answer Form C and C (2) Interrogatories of Appendix II of the N.J. Rules of Court; and

TAKE NOTICE this is a continuing demand.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Eric S. Lentz, Esq. is hereby designated as trial counsel for plaintiffs.

DEMAND FOR INSURANCE INFORMATION

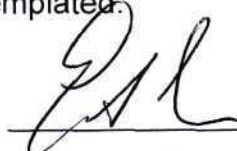
Pursuant to R 4:10-2 (b) state whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Attach a copy of each insurance policy or in the alternative state:

- A. Name and address of insurer or issuer;
- B. Policy number;
- C. Dates of inception and expiration of coverage;
- D. Names and addresses of all persons insured;
- E. Policy limits;
- F. Name and address of person who has custody and possession of policy

CERTIFICATION

The undersigned hereby certifies that the within matter in controversy is not the subject of any other action pending in any Court or pending arbitration proceeding and that no other action or arbitration proceeding is presently contemplated.



Eric S. Lentz
Attorney for Plaintiffs

Dated: April 12, 2006

UNION COUNTY SUPERIOR COURT
2 BROAD STREET
ELIZABETH NJ 07207

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (908) 659-3844
COURT HOURS

DATE: JUNE 07, 2006
RE: MCCLOUD ET AL VS UNION COUNTY ET AL
DOCKET: UNN L -002082 06

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ROBERTO ALCAZAR

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (908) 659-4177.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

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