

HARKAVY, GOLDMAN, GOLDMAN & GERSTEIN, P.A.  
1129 Bloomfield Avenue, Suite 214  
West Caldwell, NJ 07006-7126  
(973) 882-3555

Attorneys for Plaintiff, SILVIA WILCOX, individually, and as *Administratrix ad Prosequendum*  
of the ESTATE OF ADDISON WILCOX,

SILVIA WILCOX, individually, and as  
*Administratrix ad Prosequendum* of the  
ESTATE OF ADDISON WILCOX,

Plaintiff,

vs.

COUNTY OF UNION, UNION  
COUNTY JAIL, UNION COUNTY  
SHERIFF'S DEPARTMENT, SHERIFF  
RALPH E. FROEHLICH, ABC  
CORPS. 1-20 (fictitious names, true  
names unknown), and JOHN DOES 1-  
25 (fictitious names, true names  
unknown),

Defendants.

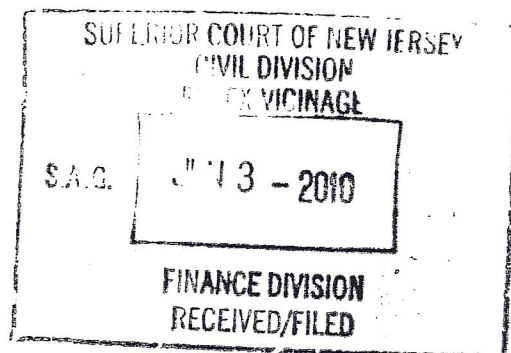
SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: UNION COUNTY  
DOCKET NO:

CIVIL ACTION

COMPLAINT AND JURY DEMAND

3479-10



Plaintiff, SILVIA WILCOX, residing at 63 Skylar Avenue, City of Newark, County of  
Essex, State of New Jersey, personal representative of the ESTATE OF ADDISON WILCOX,  
deceased, and *Administratrix ad Prosequendum* for ADDISON WILCOX, deceased,  
complaining of the Defendants alleges as follows:

**PLAINTIFFS**

1. **Addison Wilcox.** Addison Wilcox, now deceased, was at all times relevant herein a resident  
of the City of Hillside, County of Union, State of New Jersey, at the time of his death.

2. **Estate of Addison Wilcox.** The Estate of Addison Wilcox is suing for the pain, suffering, shock, agony, and personal injury incurred by him before his death at the hands of the Defendants, and/or their unknown agents on June 5, 2008. This claim is being presented by and through Administratrix ad Prosequendum, Silvia Wilcox.
3. **Silvia Wilcox.** Silvia Wilcox is the mother of Addison Wilcox, and at all times relevant herein a resident of the City of Newark, County of Essex, State of New Jersey, at the time of his death. She is suing for the loss of the support, comfort, care, protection and society of her son, Silvia Wilcox, as well as for the civil rights violations, personal injuries and other harm inflicted upon or caused to her by the wrongful acts or omissions of Defendants and/or their agents.

## II.

### DEFENDANTS

4. **Union County Jail.** Union County Jail, located at 15 Elizabethtown Plaza, Elizabeth, New Jersey, is a facility operated and controlled by the County of Union, and is responsible for the hiring, supervision, training and retention of corrections personnel at that facility, and is being sued under 42 U.S.C. § 1983 and the New Jersey Tort Claims Act for the actions of its agents and employees and for failing to train, negligently training, failing to supervise and negligently supervising these agents and employees, with deliberate indifference to the rights of the Plaintiff.
5. **Union County Sheriff's Department and Sheriff Ralph G. Froehlich.** At the time this cause of action arose, Sheriff Ralph G. Froehlich, in his official capacity, responsible for establishing the policies and procedures for the hiring, supervision, training and retention of corrections personnel within the Union County Sheriff's Department as well as the Union

County Jail, and is being sued under 42 U.S.C. § 1983 and the New Jersey Tort Claims Act for the actions of agents and employees of the Union County Sheriff's Department and Union County Jail, for failing to train, negligently training, failing to supervise and negligently supervising these agents and employees, with deliberate indifference to the rights of the Plaintiff.

6. **John Does 1 through 25.** John Does 1 through 25 are agents and employees of the County of Union, Union County Jail, Union County Sheriff's Department and/or ABC Corporations, individually and under color of state law. John Doe Defendants are being sued in their official and individual capacities for assault, battery, negligence, gross negligence, and civil rights violations as set forth below.
7. **ABC Corporations 1 through 20.** ABC Corporations 1 through 20 and/or its parent company or companies or subsidiaries, individually and under color of state law, independently contract with the County of Union, Union County Jail, and/or Union County Sheriff's Department or its authorized agent to provide medical care and treatment to inmates in the facility. ABC Corporations 1-20 are being sued in for negligence, gross negligence, and civil rights violations as set forth below.

### III.

#### COMPLIANCE WITH NEW JERSEY TORT CLAIMS ACT

8. Plaintiffs have complied in all particulars with the provisions and requirements of the New Jersey Tort Claims Act, serving notice on Defendants on or about August 13, 2008.

