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*Attorneys for Plaintiffs, Azuree Albanese and Edward Albanese,
as the parents and natural guardians of L.A.*

AZUREE ALBANESE and EDWARD
ALBANESE, as the parents and natural
guardians of L.A.,

Plaintiffs,

v.

BOARD OF EDUCATION OF THE
TOWNSHIP OF WALL, IN THE
COUNTY OF MONMOUTH; JESSICA
BERUBE; ADRIENNE FOUTZ; 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: MONMOUTH COUNTY

DOCKET NO.:

Civil Action

**COMPLAINT & DEMAND FOR TRIAL
BY JURY; FIRST DEMAND FOR
PRODUCTION OF DOCUMENTS AND
FIRST SET OF INTERROGATORIES
DIRECTED TO ALL DEFENDANTS**

Azuree Albanese (“Plaintiff A. Albanese”) and Edward Albanese (“Plaintiff E. Albanese”), as the parents and natural guardians of L.A. (“Minor Plaintiff L.A.”) (all collectively “Plaintiffs”), by way of Complaint against Defendant Board of Education of the Township of Wall, in the County of Monmouth (“Defendant WBOE”), Defendant ABC Corporations 1-5 (fictitious names describing presently unknown business entities) (along with “Defendant WBOE,” collectively referred to as the “Corporate Defendants”), Defendant Jessica Berube (“Defendant Berube”), Defendant Adrienne Foutz (“Defendant Foutz”), and Defendants John Does 1-5 (fictitious names

describing presently unidentified individuals) (along with “Defendant Berube” and “Defendant Foutz,” collectively referred to as the “Individual Defendants”) (all collectively “Defendants”) allege 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 WBOE’s administration and teachers completely and utterly abdicated these responsibilities when Defendant Berube deliberately and forcibly placed Minor Plaintiff L.A., one of her fourth (4th) grade students, in a classroom closet with the door closed during school hours.

Indeed, on April 8, 2022, allegedly because Minor Plaintiff L.A. was laughing in class, Defendant Berube removed a drum set from a classroom closet and forced Minor Plaintiff L.A. to go into said closet. Thereafter, Defendant Berube walked out of the closet, closed the door, and left Minor Plaintiff L.A. alone and unsupervised. Adding insult to injury, once Minor Plaintiff L.A. was eventually out of the classroom closet, she overheard Defendant Foutz, another music teacher employed by Defendant WBOE, tell a student to delete a recording of the aforementioned events. As a direct result of the foregoing events, Minor Plaintiff L.A. is now experiencing severe and lasting emotional distress.

In allowing the events on April 8, 2022 to transpire, Defendants were, clearly and unequivocally, grossly negligent and reckless in permitting Minor Plaintiff L.A. to be subjected to such unlawful conduct. Fortunately, New Jersey law provides redress for victims of such conduct.

Accordingly, Plaintiffs bring the instant action to assert their basic right to attend school in a safe environment.

PARTIES

1. Plaintiffs A. Albanese and E. Albanese are individuals currently residing in Wall Township, New Jersey. At all times relevant herein, Plaintiffs A. Albanese and E. Albanese are the legal guardians of Minor Plaintiff L.A.

2. Minor Plaintiff L.A. is a minor currently residing in Wall Township, New Jersey. Minor Plaintiff L.A. is an eleven (11) year old female, and at all times relevant hereto, was a student at Central Elementary School in the County of Monmouth and State of New Jersey. Central Elementary School is operated by Defendant WBOE.

3. Defendant WBOE is a body politic of the State of New Jersey which operates the Wall Township School District, including, but not limited to, Central Elementary School, in the County of Monmouth and the State of New Jersey. Central Elementary School, located at 2007 Allenwood Road, Wall Township, New Jersey 07719, is an elementary school operated by Defendant WBOE. At all times relevant hereto, Minor Plaintiff L.A. was a student at Central Elementary School.

4. Upon information and belief, Defendant Berube, at all times relevant hereto, is employed by Defendant WBOE as an Instrumental Music Teacher at Central Elementary School and resides in the State of New Jersey.

5. Upon information and belief, Defendant Foutz, at all times relevant hereto, is employed by Defendants WBOE and School as a Fourth Grade Music Teacher at Central Elementary School and resides in the State of New Jersey.

6. Defendant ABC Corporations 1-5 are currently unidentified business entities that have acted in concert with Corporate 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.

7. Defendant John Does 1-5 are currently unidentified business entities 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

8. Minor Plaintiff L.A. is an eleven (11)-year-old female who was in the fourth (4th) grade at Central Elementary School during the 2021-22 school year. During that school year, Defendant Berube was Minor Plaintiff L.A.'s Instrumental Music Teacher.

9. During a class on April 8, 2022, Defendant Berube informed Minor Plaintiff L.A. that she needed to go into the classroom closet because she was laughing during class. Defendant Berube then moved a drum set from the aforementioned closet and forced Minor Plaintiff L.A. to enter same. Once Minor Plaintiff L.A. was within said closet, Defendant Berube walked out of said closet and closed the door to same at which time Minor Plaintiff L.A. was left alone, and completely unsupervised, in the closet (the "April 8, 2022 incident").

10. Minor Plaintiff L.A. was in the closet in Defendant Berube's classroom for approximately 2-3 minutes, and during that time, Defendant Berube did not allow Minor Plaintiff L.A. out of the closet at any time.

11. Thereafter, Minor Plaintiff L.A. opened the door herself to let her out when she saw the rest of her class leaving the classroom. Prior to that, not a single teacher, including, but not limited to Defendants Berube or Foutz, ever opened the door for Minor Plaintiff L.A. to leave.

12. While Minor Plaintiff was in the school closet in Defendant Berube's classroom, she observed other students laughing, making faces at, and otherwise ridiculing her as there was a window on the closet's door.

13. Once out of said closet, Minor Plaintiff L.A. overheard Defendant Foutz, another teacher employed by Defendant WBOE who was present at the time of the April 8, 2022 incident, instructing a student to delete a recording of the April 8, 2022 incident. Upon information and belief, said recording was, in fact, deleted at that time.

14. When Minor Plaintiff L.A. exited the closet, no teacher, including but not limited to Defendants Berube and Foutz, ever spoke further to her about why she was put in the closet in the first place.

15. Following the April 8, 2022 incident, a classmate of Minor Plaintiff L.A. was allowed to repeatedly ridicule Minor Plaintiff L.A. later that day by referring to her as the "closet girl."

16. Incredibly, neither Plaintiff A. Albanese nor Plaintiff E. Albanese were ever contacted directly by a school employee at any point in time on April 8, 2022, or thereafter, to advise that the April 8, 2022 incident took place; in fact, Minor Plaintiff L.A.'s parents only became aware of same the following day at a softball game at which time they were informed of same from a parent whose child was in Minor Plaintiff L.A.'s class.

17. After learning of the April 8, 2022 incident, Plaintiff A. Albanese promptly complained to the Principal of Central Elementary School, Jill Antonello ("Principal Antonello")

via email and telephone on April 9, 2022. At that time, Principal Antonello stated that Defendant Foutz had denied that Minor Plaintiff L.A. was put in the closet in Defendant Berube's classroom.

18. At that time, Plaintiff A. Albanese also informed Minor Plaintiff L.A.'s 4th grade teacher, Kyra LaFerlita ("Mrs. LaFerlita"), of the April 8, 2022 incident and further advised Ms. LaFerlita that it had been difficult to convince Minor Plaintiff L.A. to return to school due to the aftermath of the April 8, 2022 incident.

19. Upon information and belief, Defendant WBOE has still, to this day, failed to (1) conduct an appropriate investigation into the April 8, 2022 incident or (2) take any meaningful remedial action with respect to same.

20. Following the April 8, 2022 incident, Minor Plaintiff L.A. was continuously humiliated and embarrassed at school, as students constantly asked Minor Plaintiff L.A. if she was, in fact, put inside the classroom closet.

21. Thereafter, and as a direct result of said humiliation and embarrassment, Minor Plaintiff L.A. experienced a mental health crisis at school on May 10, 2022, necessitating immediate intervention by the school guidance counselor, Lauren Young ("Ms. Young").

22. Minor Plaintiff L.A., has, and continues to, experience severe emotional distress and trauma as a result of the April 8, 2022 incident. She experiences periods of anxiousness, has no longer wanted to attend Central Elementary School for periods of time, and exhibits diminished self-esteem and symptoms of depression. Minor Plaintiff L.A. was also greatly embarrassed and humiliated from the April 8, 2022 incident insofar as she was ridiculed by other students about same.

23. Defendants failed to provide a safe learning environment to Minor Plaintiff L.A. by allowing Minor Plaintiff L.A. to be deliberately and forcibly placed in a classroom closet on April

8, 2022 and, thereafter, allowing Minor Plaintiff L.A.'s classmates to repeatedly mock Minor Plaintiff L.A. in connection with said events.

24. As a result of the April 8, 2022 incident, Minor Plaintiff L.A. has, and continues to, suffer severe emotional distress and trauma.

COUNT ONE

NEGLIGENCE

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

26. Defendant WBOE supervised, cared for, and/or controlled the conduct of its employees during the school day at Central Elementary School.

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

28. Notwithstanding said duty, Defendant WBOE, by and through its agents, servants, and employees, carelessly, negligently, and recklessly supervised Defendants Berube and Foutz.

29. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendant WBOE as aforesaid, Plaintiffs were damaged; indeed, Minor Plaintiff L.A. has suffered, and will continue to suffer, severe mental anguish in the future.

WHEREFORE, Plaintiffs demand judgment against Defendants for the damages as a result of the carelessness, negligence, and recklessness of 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

NEGLIGENT SUPERVISION

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

31. Defendants' negligence, gross negligence, reckless conduct, and supervision of its employees directly and proximately caused Minor Plaintiff L.A. to be deliberately and forcibly placed in a closet during the school day on April 8, 2022.

32. Defendants' negligent supervision of its employees directly and proximately caused Minor Plaintiff L.A. severe emotional damage.

33. 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 THREE

NEGLIGENT TRAINING

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

35. Defendant WBOE's negligence, gross negligence, reckless conduct, and training of Defendants Berube and Foutz, as employees and/or supervisors, directly and proximately caused Minor Plaintiff L.A. harm.

36. Defendant WBOE's negligent training of Defendants Berube and Foutz, as employees and/or supervisors, directly and proximately caused Minor Plaintiff L.A. severe emotional damage.

37. 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 as 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 trial by jury on all issues.

McOMBER McOMBER & LUBER, P.C.
*Attorneys for Plaintiffs, Azuree Albanese and
Edward Albanese, as the parents and natural
guardians of L.A.*

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

Dated: October 13, 2023

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

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

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiffs, Azuree Albanese and Edward Albanese, as the parents and natural guardians of L.A.

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

Dated: October 13, 2023

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AZUREE ALBANESE and EDWARD ALBANESE, as the parents and natural guardians of L.A.,

Plaintiffs,

v.

BOARD OF EDUCATION OF THE TOWNSHIP OF WALL, IN THE COUNTY OF MONMOUTH; JESSICA BERUBE; ADRIENNE FOUTZ; 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
MONMOUTH COUNTY
DOCKET NO.:

Civil Action

FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS

FIRST SET OF DOCUMENT REQUESTS, INTERROGATORIES, AND PUNITIVE DAMAGES

PLEASE TAKE NOTICE that, McOmbler McOmbler & Luber, P.C., attorneys for Plaintiffs Azuree Albanese and Edward Albanese, as the parents and natural guardians of L.A. (collectively, “Plaintiffs”) demand that Defendants Board of Education of the Township of Wall, in the County of Monmouth, Jessica Berube, and Adrienne Foutz (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 A. Albanese” shall mean Azure Albanese o/b/o L.A., Plaintiff in the above-captioned action.

3. “Plaintiff E. Albanese” shall mean Edward Albanese o/b/o L.A., Plaintiff in the above-captioned action.

4. “Plaintiff L.A.” shall mean Minor Plaintiff L.A., Plaintiff in the above-captioned action.

5. “Defendant WBOE” shall mean Board of Education of the Township of Wall, in the County of Monmouth, 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.

6. “Defendant Berube” shall mean Jessica Berube, Defendant in the above-captioned action.

7. “Defendant Foutz” shall mean Adrienne Foutz, Defendant in the above-captioned action.

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

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

10. The 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.

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

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

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

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

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

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

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

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

19. “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.

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

21. The terms "all" and "any" shall both be construed as "any and all."

22. 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.

23. 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.

24. 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.

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

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

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 personnel file Defendant(s) maintained pertaining to Plaintiff L.A., 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) 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. 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, 2013, 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 WBOE concerning Individual Defendant(s).

24. All statements, documents, or communications relating to any Investigation by Defendant WBOE 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 in this matter's employment with 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 L.A. 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. A written job description for each position held by any Individual Defendant or any employee or agent of Defendant(s) during his/her tenure of employment with Corporate Defendant(s).

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

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

37. All documents relating to Plaintiff L.A.'s enrollment at Corporate Defendant(s).

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

39. All statements, documents, or communications concerning any occasion in which Defendant(s) reprimanded or disciplined Plaintiff L.A.

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

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

42. All statements, documents, or communications concerning the meeting between Lauren Young ("Ms. Young") and Plaintiffs following Minor Plaintiff's May 10, 2022 mental health crisis.

43. All statements, documents, or communications concerning the meeting between Jill Antonello ("Principal Antonello") and Plaintiffs following the April 8, 2023 incident (the "Closet Incident").

44. All statements, documents, videotapes, or communications concerning the videotape recording ("the Recording") documenting the Closet Incident.

45. All statements, documents, or communications concerning any investigation conducted by Defendants regarding the Closet Incident.

46. All statements, documents, or communications concerning any student or faculty eyewitness accounts to the Closet Incident.

47. All statements or documents concerning any communications between Individual Defendants and Corporate Defendants regarding the harassment of Plaintiff L.A.'s by his/her classmate.

48. All statements, documents, or communications concerning any measures taken by Defendant WBOE to protect Plaintiff L.A.'s from Defendants Berube and Foutz during the 2021-2022 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. List chronologically each job title held by Defendant(s) while employed by any Defendant(s), indicating the time period during which each position was held.

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

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

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

- a. from what position or job title the promotion was from and to what position or job title the promotion was to;
- b. the date of the promotion;
- c. the reason(s) for the promotion;

- d. the names, last known addresses, last known telephone numbers, and job titles, of all persons involved in the decision-making process and the nature and extent of their involvement in the decision;
- e. the criteria used in making the decision; and
- f. identify all documents that in any way touch upon, discuss or pertain to any of the matters referred to in this Interrogatory.

13. State whether Defendant(s) were ever demoted while employed by any Defendant(s). For each demotion, state the following:

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

14. State the full name of each faculty member that worked with or oversaw Plaintiff L.A. throughout his/her enrollment during the 2021-2022 school year.

15. 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.

16. 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.

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

18. 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.

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

20. 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.

21. 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.

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

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

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

25. 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).

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

27. 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.

28. 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;
- 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.

29. 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.

30. 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.

31. 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)*.

32. 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.

33. 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.

34. 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.

35. 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.

36. 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.

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

38. 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.

39. 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, 2013 and the present;
- b. Computer software operating systems and end user-applications servicing Corporate Defendant(s) between January 1, 2013 and the present;
- c. All email software and versions which have been used on hardware servicing Corporate Defendant(s) between January 1, 2013 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, 2013 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.

40. Identify each email account each Defendant(s) utilized as an employee of Defendant(s) in the last three (3) years.

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

42. 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.

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

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

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

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

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

48. Describe, in full detail, the facts and circumstances relating to the Closet Incident.

49. Describe, in full detail, the facts and circumstances relating to the continuous and pervasive harassment Plaintiff L.A. faced from her classmate after the Closet Incident.

50. Describe, in full detail, the facts and circumstances that relate to any statements made wherein Plaintiff L.A. was referred to as "closet girl."

51. Describe, in full detail, the facts and circumstances relating to Plaintiff L.A.'s mental health crisis on May 10, 2022.

52. Describe, in full detail, the facts and circumstances that relate to any disciplinary

action taken against Defendant Berube during her time in the Township of Wall School District.

53. Describe, in full detail, the facts and circumstances that relate to any disciplinary action taken against Defendant Foutz during her time in the Township of Wall School District.

54. Describe, in full detail, the facts and circumstances that relate to any remedial actions taken in response to Plaintiffs' complaints after the 2021-2022 school year.

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

56. Describe, in full detail, why Defendant WBOE failed to notify Plaintiffs A. Albanese and E. Albanese of the Closet Incident.

57. Describe, in full detail, which of Defendant WBOE's agents made the decision not to notify Plaintiffs A. Albanese and E. Albanese of the Closet Incident.

58. Describe, in full detail, the facts and circumstances that relate to the Grievance made by Plaintiff A. Albanese to Principal Antonello after the Closet Incident.

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

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 2013 through 2023 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 2013 through 2023, 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 2013 through 2023, 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 2013 through 2023, 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 2013 through 2023, 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;
 - 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;
 - 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;
 - 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;
 - 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;

- 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.);
- 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;
- e. Docket number.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiffs, Azuree Albanese and Edward Albanese, as the parents and natural guardians of L.A.

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

Dated: October 13, 2023

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: _____, 2023

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: _____, 2023

By: _____