

Suit Filed in Fair Haven Cyclist Fatality

The Estate of Cole Porter, by Megan Porter, his wife and the Administratrix of his Estate, has filed suit this day against those entities responsible for the reckless operation of the September 15, 2013 Tour de Fair Haven bicycle race. During the race, and in view of his wife and infant children, Cole Porter suffered serious injuries which ultimately led to his demise on or about October 2, 2013.

The wrongful death and dependency actions were filed by Raymond A. Gill, Jr. of Gill & Chamas, LLC in Woodbridge, New Jersey in the Superior Court of New Jersey, Law Division, Middlesex County. Named as defendants are USA Cycling, Inc.; Cycles 54; Circle Motorsports, Inc. d/b/a Circle BMW; Forefront, Inc.; Daniel Donnelly; Christian Young and Michel Berger.

According to Mr. Gill, the defendant, USA Cycling through its agents, servants and/or employees including; Daniel Donnelly who acted as a lead official, Michel Berger whose company, Forefront, Inc. was a sponsor, acted as the event director, and Christian Young, a race director and sponsor on behalf of his company, Cycles 54, recklessly and in blatant disregard of USA Cycling course safety guidelines, allowed the race to proceed with Circle BMW drivers unqualified in bicycle race pace-vehicle operation, inappropriately trained race officials, and inappropriately equipped pace cars.

At the end of the first lap, for some unexplained reason, the defendant, Donnelly, according to Gill, wantonly and recklessly violated USA Cycling safety guidelines by attempting to throw a wireless communication device into the back of the Circle BMW pace car, which was operating without a spotter. The communication device bounced off the trunk lid and into the street. To make matters worse, the race official Donnelly, according to the eyewitness account of a Fair Haven Police Officer, ran into the street just 10 to 20 feet in front of the racers who were traveling between 30 mph and 40 mph, causing the collision between Mr. Donnelly and Cole Porter.

According to Plaintiff's counsel, the conduct of Mr. Donnelly was reckless in not only attempting to throw a communication device into a car but also running into the street directly in front of the racers who were only 10 to 20 feet away from him.

Although Plaintiff's counsel filed the statutorily required Notice of Claim against the Borough of Fair Haven and other municipal entities, they were not named as defendants in the case as Gill indicated there was no evidence to suggest that they were actively involved in the wanton and reckless disregard of USA Cycling rules. Pursuant to State Law the complaint was filed without a specification of monetary damages.

The attorney for the family would like anyone with still pictures or video of the incident to please contact him.

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CIVIL RECORDS
N.J. SUPERIOR COURT
MIDDLESEX VICINAGE

ACCEPTED AT COUNTER
"UNDER REVIEW"
COPY GIVEN AT COUNTER (Y/N)

JAN -8 A 10 37

FILED & RECEIVED #5

ESTATE OF COLE R. PORTER, by
MEGAN PORTER as Administratrix ad
Prosequendum; MEGAN PORTER,
Individually; FAYE PORTER and LILY
PORTER, Individually through their
Guardian ad Litem and natural mother,
MEGAN PORTER

Plaintiffs,

vs.

USA CYCLING, INC; CYCLES 54;
CIRCLE MOTORSPORTS, INC., d/b/a
CIRCLE BMW; FOREFRONT, INC.
DANIEL DONNELLY, Individually and as
agent, servant, and/or employee of USA
CYCLING, INC.; CHRISTIAN YOUNG,
Individually and as agent, servant, and/or
employee of USA CYCLING, INC. and/or
CYCLES 54; MICHEL BERGER,
Individually and as agent, servant, and/or
employee of FOREFRONT, INC. and/or
USA CYCLING, INC.; JOHN DOES 1-40
(said names fictitious, real names unknown),
and ABC CORPS 1-20 (said names fictitious,
real names unknown),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.:

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiffs, Estate of Cole R. Porter, by Megan Porter, as Administratrix ad
Prosequendum, and Megan Porter individually, and Faye Porter and Lily Porter,
individually, as natural children of Cole R. Porter, through their Guardian ad Litem and

natural mother, Megan Porter, residents of 19 Obre Place, Borough of Shrewsbury, County of Monmouth, State of New Jersey, by way of Complaint against the Defendants, say:

JURISDICTION

The defendant, USA Cycling, Inc., having continuous contacts in the County of Middlesex though sanctioning, controlling, organizing, promoting, governing and/or otherwise administering bicycle races in, amongst other locations, Piscataway on June 1, 2013 (Race ID. 2539), Piscataway on August 8, 2013 (Race ID. 2930), Piscataway on August 25, 2013 (Race ID. 2910), and Woodbridge on September 8, 2013 (Race ID. 3114); supports venue in this matter being properly laid in Middlesex County.

FIRST COUNT

1. Plaintiff Megan Porter was granted letters of Administration ad Prosequendum by the Surrogate's Court of the County of Monmouth, New Jersey. The letters were granted to authorize Plaintiff to bring this action against the defendants referred to in this complaint on behalf of Plaintiff's decedent, Cole R. Porter.
2. At all times relevant to the events described in this Complaint, Plaintiff's decedent, Cole R. Porter, resided at 19 Obre Place in the Borough of Shrewsbury, County of Monmouth and State of New Jersey.
3. On or about September 15, 2013, Cole R. Porter was operating a bicycle while participating in the "Tour de Fair Haven" bicycle race, an event sanctioned, controlled, organized, promoted, governed and otherwise administered by, amongst others, the defendant USA Cycling, Inc., on or about River Road in the Borough of Fair Haven, New Jersey.

4. The defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10 were responsible for the race's protocol, procedures and standards in its operation.

5. At the time and place aforesaid, the defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10, attempted to throw a wireless communication device into a BMW automobile owned by the defendant, Circle BMW, which was traveling at a high rate of speed.

6. The conduct of defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10, as aforesaid, was violative of policies, procedures and protocols set forth by USA Cycling, as well as generally accepted standards in the field of bicycle racing, and constituted gross negligence, wanton and reckless conduct.

7. The defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10, then carelessly, recklessly, and in blatant disregard of safety regulations, ran onto the active race course on River Road in an attempt to secure the wireless communication device, which had fallen onto the race course. In doing so, they caused a collision between Plaintiff's decedent, Cole R. Porter and defendants.

8. As a direct and proximate result of the negligence, carelessness, recklessness, and/or wanton disregard of the defendants, as aforesaid, decedent Cole R. Porter suffered physical and emotional injuries, considerable pain, anguish and suffering

and permanent injuries, and conscious pain and suffering, ultimately causing decedent's death on or about October 2, 2013.

9. This action has been commenced within two (2) years of the death of the plaintiff's decedent, Cole R. Porter.

10. The plaintiff, Megan Porter, individually and as Administratrix ad Prosequendum of the Estate of Cole R. Porter and as representative of beneficiaries of the Estate of Plaintiff's decedent, brings this action for all pecuniary losses and conscious pain and suffering of Cole R. Porter, Deceased, and that suffered by the heirs and/or dependents of the decedent as prescribed by all of the State of New Jersey, and in particular the Wrongful Death Act, N.J.S.A. 2A:31-5 et seq., and Survivorship Act, as described by N.J.S.A. 2A: 15-3, et seq.

WHEREFORE, the Plaintiffs demand judgment against the aforementioned Defendants, either jointly, severally or in the alternative, for compensatory damages together with interests and costs of suit.

SECOND COUNT

1. Plaintiffs repeat and re-allege each and every paragraph of the First Count and make the same a part hereof by reference thereto.

2. At the time and place aforesaid, the defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10, did willfully, purposefully, recklessly and wantonly disregard race protocol, procedures and standards for which he was responsible to implement.

3. At the time and place aforesaid, the defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10, attempted to throw a wireless communication device into a BMW automobile owned by the defendant, Circle BMW, which was traveling at a high rate of speed.

4. The defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10, then willfully, purposefully, recklessly and/or wantonly ran onto the active race course on River Road in an attempt to secure the wireless communication device, which had fallen onto the race course. In doing so, he caused a collision between Plaintiff's decedent, Cole R. Porter and defendants.

5. As a direct and proximate result of the defendant's willful, purposeful, wanton and reckless disregard for race protocol, procedures and standards for which defendants had a duty to implement, and their willful, purposeful, wanton and reckless entrance onto an active bicycle race course, defendants, caused the crash with Plaintiff's decedent, Cole R. Porter, thereby resulting in the death of Plaintiff's decedent, Cole R. Porter.

6. Defendants are liable to Plaintiff for punitive damages pursuant to N.J.S.A. 2A:15-5.9.

7. As a direct and proximate result of the recklessness, and/or wanton disregard of the defendants, Daniel Donnelly, John Does 1-10 individually, and/or as agent, servant and/or employee of the defendant USA Cycling, Inc., and/or ABC Corps. 1-10, as aforesaid, Plaintiff's decedent Cole R. Porter suffered physical and emotional

injuries, considerable pain, anguish and suffering and permanent injuries, and conscious pain and suffering, ultimately causing Plaintiff's decedent's death on or about October 2, 2013.

WHEREFORE, Plaintiffs demand judgment against the defendant as aforesaid, for punitive damages pursuant to N.J.S.A. 2A:15-59, together with interest and costs of suit.

THIRD COUNT

1. Plaintiffs repeat and re-allege each and every paragraph of the First and Second Counts and make the same a part hereof by reference thereto.

2. At the time and place aforesaid, the defendants, Circle BMW and its agents, servants and/or employees John Does 11-20, acted as a sponsor of the "Tour de Fair Haven" and agreed, for consideration paid by Circle BMW in exchange for business promotion, to provide race pace car(s), drivers and/or safety personnel therefore.

3. At the time and place aforesaid, the defendant, Circle BMW through its agents, servants and/or employees, John Does 11-20 failed to properly follow race protocol, procedure, and regulations by not having appropriate safety personnel inside the vehicle with wireless communication.

4. The conduct of defendant, Circle BMW through its agents, servants and/or employees, John Does 11-20 was/were negligent, careless, and/or reckless in not only traveling at a high rate of speed but failing to have an appropriate safety personnel and wireless communication as per race protocol.

5. As a direct and proximate result of the negligence, carelessness, recklessness, and/or wanton disregard of the defendant Circle BMW, through their

agents, servants, and/or employees, John Does 11-20, Plaintiff's decedent was caused to collide with a race official as set forth in the body of this Complaint.

6. As a direct and proximate result of the conduct of the defendant Circle BMW, though their agents, servants, and/or employees, and/or John Does 11-20, Plaintiff's decedent Cole R. Porter suffered physical and emotional injuries, considerable pain, anguish and suffering and permanent injuries, and conscious pain and suffering, ultimately causing Plaintiff's decedent's death on or about October 2, 2013.

WHEREFORE, the Plaintiffs demand judgment against the aforementioned Defendants, either jointly, severally or in the alternative, for damages together with interest and costs of suit.

FOURTH COUNT

1. Plaintiffs repeat and re-allege each and every paragraph of the First, Second, and Third Counts and make the same a part hereof by reference thereto.

2. At the time and place aforesaid, the defendant, Cycles 54 and its agents, servants and/or employees, Christian Young, and/or John Does 21-30, acted as a sponsor of the "Tour de Fair Haven" and agreed, for consideration paid by Cycles 54 in exchange for business promotion, to provide safety personnel, organizers, chairs, and/or officials.

3. At the time and place aforesaid, the defendant, Forefront, Inc. and its agents, servants and/or employees, Michel Berger, and/or John Does 31-40, acted as a sponsor of the "Tour de Fair Haven" and agreed, for consideration paid by Forefront, Inc. in exchange for business promotion, to provide safety personnel, organizers, chairs, and/or officials.

4. At all relevant times, defendants, USA Cycling, Inc., Cycles 54, Forefront, Inc., and/or ABC Corps 11-20, , Daniel Donnelly, individually and/or as agent, servant and/or employee of USA Cycling, Inc., Christian Young, individually and/or as agent, servant and/or employee of USA Cycling, Inc. and/or Cycles 54, Michel Berger, individually and/or as agent, servant and/or employee of USA Cycling, Inc. and/or Forefront, Inc., and/or John Does 21-40, were responsible for hiring, supervising, training and/or retention of the individuals providing and implementing procedure, protocol, regulation, policies, and/or supervisory direction for the "Tour de Fair Haven."

5. At the time and place aforesaid, defendants so negligently, carelessly, recklessly and/or in wanton disregard hired, supervised, trained and/or retained Daniel Donnelly, Christian Young, Michel Berger, and/or John Does 21-40, individually and/or as agent, servant and/or employee of USA Cycling, Inc., and/or Cycles 54, and/or Forefront, Inc. so as to cause a collision between the decedent Cole R. Porter, and a race official, Daniel Donnelly.

6. As a direct and proximate result of the negligence, carelessness, and/or recklessness of the aforementioned Defendants, the Plaintiff's decedent Cole R. Porter suffered physical and emotional injuries, considerable pain, anguish and suffering and permanent injuries, and conscious pain and suffering, ultimately causing decedent's death, on October 2, 2013.

WHEREFORE, Plaintiffs demand judgment against the aforementioned Defendants, either jointly, severally or in the alternative, for damages together with interests and costs of suit.

FIFTH COUNT

1. Plaintiffs repeat and re-allege each and every paragraph of the First, Second, Third, and Fourth Counts and make the same a part hereof by reference thereto.

2. At all relevant times herein the Plaintiff Megan Porter was and is the lawful wife of Plaintiff's decedent, Cole R. Porter and, as such, is entitled to his services, society, comfort, and consortium.

3. As a direct and proximate result of the negligence, carelessness, and/or recklessness of the Defendants as aforesaid, the Plaintiff Megan Porter has lost, and will in the future lose, the services, society, comfort, and consortium of her husband, Cole R. Porter.

WHEREFORE, Plaintiff Megan Porter demands judgment against the Defendants, jointly, severally or in the alternative for damages, together with interest and costs of suit.

SIXTH COUNT

1. Plaintiffs repeat and re-allege each and every allegation of the First, Second Third, Fourth, and Fifth Counts and make same a part hereof by reference thereto.

2. Infant plaintiffs Faye Porter and Lily Porter through their Guardian ad Litem and natural mother, Megan Porter, assert that the plaintiff's decedent was survived by two daughters, the infant plaintiffs Faye Porter and Lily Porter.

3. As a direct and proximate result of the negligence, carelessness, and/or recklessness of the defendants as aforesaid, Plaintiffs Faye Porter and Lily Porter have lost and will in the future continue to lose and be deprived of the services, and society of the Plaintiff's decedent, their natural father Cole R. Porter.

WHEREFORE, Plaintiffs demand judgment against the aforementioned Defendants, either jointly, severally or in the alternative, for damages together with interests and costs of suit.

SEVENTH COUNT

1. Plaintiffs repeat and re-allege each and every allegation of the First, Second, Third, Fourth, Fifth, and Sixth Counts and make same a part hereof by reference thereto.

2. The plaintiff and infant plaintiffs, Megan Porter is the lawful wife of Cole R. Porter, and Faye and Lily Porter are the natural daughters of the plaintiff's decedent, Cole R. Porter, and were eyewitness to the aforementioned crash, which resulted in the death of their husband and father, Plaintiff's decedent, Cole R. Porter.

3. As a direct and proximate result of the negligence, carelessness, and/or recklessness of the aforementioned Defendants, the plaintiffs, Megan Porter, Faye Porter, and Lily Porter sustained severe and permanent emotional distress and anguish. They have suffered and will in the future suffer from great pain, suffering, anguish and severe emotional distress; they have and will in the future be forced to expend large sums of money for medical care and attention, and they have been and will in the future be unable to pursue their normal daily activities as before.

WHEREFORE, and pursuant to Portee v. Jaffee, 84 N.J. 88 (1980), Jablonowska v. Suther, 195 N.J. 91, 111 (2008), and Ortiz v. John D. Pittenger Builder, Inc., 382 N.J. Super. 552, 563 (Law Div. 2004), and Hinton v. Meyers, A-5700-08T1, Plaintiffs, Megan Porter, Faye Porter, and Lily Porter demand judgment against the Defendants, jointly,

severally or in the alternative for all available damages, together with interest and costs of suit.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to all issues.

NOTICE OF DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE, that pursuant to the Rules of Court, Raymond A. Gill, Jr., Esq. is hereby designated as trial counsel of the within matter.

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1(b), the Plaintiffs hereby demand that the Defendants provide answers to the uniform interrogatories set forth in Form C of Appendix II of the Rules Governing the Courts of the State of New Jersey.

GILL & CHAMAS, LLC.
Attorneys for Plaintiffs

BY: 

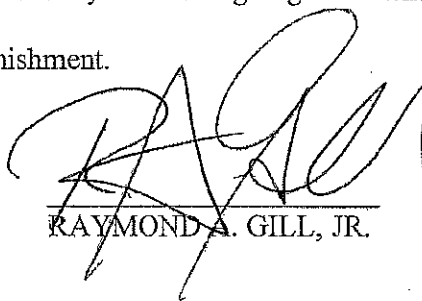
RAYMOND A. GILL, JR.

DATED: January 2, 2014

CERTIFICATION PURSUANT TO R. 4:5-1



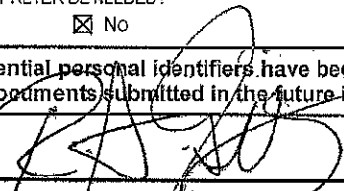
I, RAYMOND A. GILL, JR., ESQ. hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and am a partner of the firm of Gill and Chamas and as such, I am fully familiar with same.
2. To the best of my knowledge, confirmation and belief, there is no other action pending about the subject matter of this Complaint in the Superior Court of New Jersey, Law Division, Middlesex County. Additionally, there are no other persons known to me who should be added as parties to this matter, nor are there any other actions contemplated.
3. I do hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


RAYMOND A. GILL, JR.

Dated: January 2, 2014

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:	
	ATTORNEY / PRO SE NAME Raymond A. Gill, Jr.		TELEPHONE NUMBER (732) 324-7600	COUNTY OF VENUE Middlesex
	FIRM NAME (if applicable) Gill & Chamas, LLC		DOCKET NUMBER (when available)	
	OFFICE ADDRESS 655 Florida Grove Road, P.O. Box 760 Woodbridge, NJ 07095		DOCUMENT TYPE Complaint	
			JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Estate of Cole Porter		CAPTION Estate of Porter v. USA Cycling, et al		
CASE TYPE NUMBER (See reverse side for listing) 605	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		
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? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION None known				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?		
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 <i>Rule 1:38-7(b)</i> .				
ATTORNEY SIGNATURE: 				



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 288 PRUDENTIAL TORT LITIGATION |
| 271 ACCUTANE/ISOTRETINOIN | 289 REGLAN |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 278 ZOMETHA/ARELIA | 291 PELVIC MESH/GYNECARE |
| 279 GADOLINIUM | 292 PELVIC MESH/BARD |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 282 FOSAMAX | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 284 NUVARING | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 601 ASBESTOS |
| 287 YAZ/YASMIN/OCELLA | 623 PROPECIA |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59