

THE LAW OFFICE OF JOHN P. GRAVES, LLC

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Attorneys for Defendant, Ruth Cox

LAUREN KANAREK,

PLAINTIFF,

vs.

**MICHAEL BARISONE; SWEETGRAS
FARMS, LLC; RUTH COX; JOHN
DOES 1-30; ABC CORPORATIONS
1-20,**

DEFENDANTS.

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: MORRIS COUNTY
: CIVIL PART

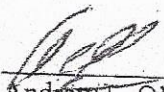
: DOCKET NO.: MRS-L-002250-19

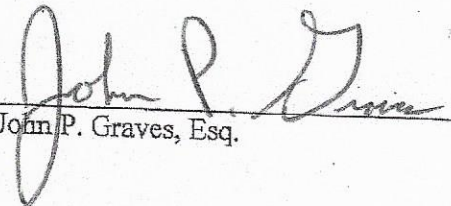
: STIPULATION EXTENDING TIME
: TO ANSWER OR OTHERWISE
: MOVE AS TO COMPLAINT, PURSUANT
: TO R. 4:6-1(c)

Pursuant to R. 4:6-1(c), it is hereby stipulated and agreed among Nagel Rice, LLP, attorneys for plaintiff, Lauren Kanarek, and The Law Office of John P. Graves, LLC, attorneys for defendant, Ruth Cox, that the time for defendant, Ruth Cox, to answer or otherwise move as to the Plaintiff's Complaint is extended until Thursday, March 26, 2020.

Nagel Rice, LLP
Attorneys for Plaintiff, Lauren Kanarek

The Law Office of John P. Graves, LLC
Attorneys for Defendant, Ruth Cox

By: 
Andrew L. O'Connor, Esq.

By: 
John P. Graves, Esq. 02/13/20

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Attorneys for Defendant, Ruth Cox

LAUREN KANAREK,		: SUPERIOR COURT OF NEW JERSEY
		: LAW DIVISION: MORRIS COUNTY
PLAINTIFF,		: CIVIL PART
		:
		: DOCKET NO.: MRS-L-002250-19
vs.		:
		:
MICHAEL BARISONE; SWEET GRASS:	Civil Action	
FARMS, LLC; RUTH COX; JOHN	:	
DOES 1-30; ABC CORPORATIONS	:	DEFENDANT RUTH COX’S ANSWER,
1-20,	:	AFFIRMATIVE DEFENSES,
DEFENDANTS.	:	CROSS-CLAIMS, JURY DEMAND AND
	:	DESIGNATION OF TRIAL COUNSEL

Defendant Ruth Cox, hereby answers Plaintiff’s Complaint as follows:

1. Defendant admits the allegations in paragraph 1 of Plaintiff’s Complaint.
2. Defendant admits the allegations in paragraph 2 of Plaintiff’s Complaint.
3. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 of Plaintiff’s Complaint.
4. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4 of Plaintiff’s Complaint.
5. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5 of Plaintiff’s Complaint.
6. Defendant is without knowledge or information sufficient to form a belief as to the truth

of the allegations in paragraph 6 of Plaintiff's Complaint regarding whether any of the named co-defendants, their representatives, associates, friends, and/or agents were engaged in an extended and protracted campaign to harass Plaintiff and her fiancée. However, Defendant Cox denies the allegation that she was engaged in an extended and protracted campaign to harass Plaintiff, and further denies this allegation as it relates to Plaintiff's fiancée.

7. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7 of Plaintiff's Complaint.

8. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8 of Plaintiff's Complaint.

9. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9 of Plaintiff's Complaint.

10. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 10 of Plaintiff's Complaint.

11. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 11 of Plaintiff's Complaint.

COUNT ONE
(STRICT LIABILITY)

12. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

13. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 13 of Plaintiff's Complaint.

14. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 14 of Plaintiff's Complaint.

15. Defendant denies the allegations in paragraph 15 of Plaintiff's Complaint.

16. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 16 of Plaintiff's Complaint.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT TWO
(NEGLIGENCE)

17. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

18. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 18 of Plaintiff's Complaint.

19. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 19 of Plaintiff's Complaint.

20. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 20 of Plaintiff's Complaint.

21. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 21 of Plaintiff's Complaint.

22. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 22 of Plaintiff's Complaint.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT THREE
(NEGLIGENCE AS TO BARISONE)

23. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

24. The allegations contained in paragraph 24 of Plaintiff's Complaint are directed against another Defendant. Moreover, the paragraph states legal conclusions to which no response is required. To the extent a response is required, the allegations are denied.

25. The allegations contained in paragraph 25 of Plaintiff's Complaint are directed against another Defendant. Moreover, the paragraph states legal conclusions to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT FOUR
(ASSAULT AND BATTERY AS TO BARISONE)

26. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

27. The allegations contained in paragraph 27 of Plaintiff's Complaint are directed against another Defendant. Moreover, the paragraph states legal conclusions to which no response is required. To the extent a response is required, the allegations are denied.

28. The allegations contained in paragraph 28 of Plaintiff's Complaint are directed against another Defendant. Moreover, the paragraph states legal conclusions to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT FIVE
(NEGLIGENCE AS TO DEFENDANT RUTH COX and JOHN DOES (11-20))

29. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

30. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 30 of Plaintiff's Complaint.

31. Defendant denies the allegations in paragraph 31 of Plaintiff's Complaint.

32. Defendant denies the allegations in paragraph 32 of Plaintiff's Complaint.

33. Defendant denies the allegations in paragraph 33 of Plaintiff's Complaint that she was negligent, and further denies that any alleged negligence on her part caused Plaintiff to sustain or experience any physical and/or emotional injury, pain, suffering, or economic loss. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint pertaining to any negligence on the part of defendants John Does (11-20).

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT SIX
(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)

34. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

35. Defendant denies the allegations in paragraph 35 of Plaintiff's Complaint that she was negligent. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint pertaining to any negligence on the part of the other named defendants.

36. Defendant denies the allegations in paragraph 36 of Plaintiff's Complaint that she was negligent, and further denies being the proximate cause of emotional harm to Plaintiff. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint pertaining to any negligence on the part of the other named defendants and whether they were the proximate cause of emotional harm to Plaintiff.

37. Defendant denies the allegations in paragraph 37 of Plaintiff's Complaint that she owed a duty to Plaintiff. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint pertaining to whether the other named defendants owed a duty to Plaintiff.

38. Defendant denies the allegations in paragraph 38 of Plaintiff's Complaint that she was negligent. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint pertaining to any negligence on the part of the other named defendants.

39. Defendant denies the allegations in paragraph 39 of Plaintiff's Complaint that she was negligent, and further denies that any alleged negligence on her part caused Plaintiff to sustain or experience any physical and/or emotional injury, pain, suffering, or economic loss. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint pertaining to any negligence on the part of other named defendants.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT SEVEN
(INTENTIONAL INFLICTION OF EMOTION DISTRESS)

40. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

41. Defendant denies the allegations in paragraph 41 of Plaintiff's Complaint as they relate to her. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint to the extent that the allegations relate to the other named defendants.

42. Defendant denies the allegations in paragraph 42 of Plaintiff's Complaint as they relate to her. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint to the extent that the allegations relate to the other named defendants.

43. Defendant denies the allegations in paragraph 43 of Plaintiff's Complaint as they relate to her. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint to the extent that the allegations relate to the other named defendants.

44. Defendant denies the allegations in paragraph 44 of Plaintiff's Complaint as they relate to her. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint to the extent that the allegations relate to the other named defendants.

45. Defendant is without knowledge or information sufficient to form a belief as to the truth

of the allegations in paragraph 45 of Plaintiff's Complaint.

46. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 46 of Plaintiff's Complaint.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT EIGHT
(PUNITIVE DAMAGES)

47. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

48. Defendant denies the allegations in paragraph 48 of Plaintiff's Complaint as they relate to her. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint to the extent that the allegations relate to the other named defendants.

49. Defendant denies the allegations in paragraph 49 of Plaintiff's Complaint as they relate to her. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Plaintiff's Complaint to the extent that the allegations relate to the other named defendants.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

COUNT NINE
(NOT DESIGNATED)

50. Ruth Cox hereby repeats and realleges each of her prior responses as though set forth at length herein.

51. The allegations contained in paragraph 51 of Plaintiff's Complaint are directed against another Defendant. Moreover, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph of Plaintiff's Complaint.

52. The allegations contained in paragraph 52 of Plaintiff's Complaint are directed against another Defendant. Moreover, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph of Plaintiff's Complaint.

WHEREFORE, Defendant Ruth Cox denies any and all liability with regard to Plaintiff's claims, and respectfully requests that Plaintiff's claims against her be dismissed with prejudice and that Ruth Cox be awarded such general, further relief as justice may require.

SEPARATE DEFENSES

FIRST SEPARATE DEFENSE

Plaintiff's Complaint fails to state a claim and/or cause of action upon which relief could be granted.

SECOND SEPARATE DEFENSE

Defendant Cox exercised due care and acted in a reasonably prudent manner with respect to all matters alleged in Plaintiff's Complaint, and Defendant Cox is not liable, in whole or in part, for any of the injuries and damages alleged in Plaintiff's Complaint.

THIRD SEPARATE DEFENSE

At all times mentioned in Plaintiff's Complaint, Defendant Cox was not negligent or careless and Defendant Cox is not responsible for any of Plaintiff's injuries and damages.

FOURTH SEPARATE DEFENSE

The shooting alleged in Plaintiff's Complaint and the injuries and damages resulting from the shooting were caused solely by the actions of Defendant Barisone, over whom Defendant Cox had no control, thereby precluding recovery from Defendant Cox.

FIFTH SEPARATE DEFENSE

At all times and with respect to all matters alleged in Plaintiff's Complaint, Defendant Cox exercised the foresight, prudence, and caution for the safety of Plaintiff that a reasonably prudent person would have exercised under the same or similar circumstances.

SIXTH SEPARATE DEFENSE

Defendant Cox had no legal duty of care to Plaintiff to prevent the shooting because the shooting was not reasonably foreseeable; there was no reason for Defendant Cox to anticipate the shooting; Defendant Cox was not present when Defendant Barisone shot Plaintiff; and there was nothing that Defendant Cox could do to prevent the shooting, which occurred "without warning or provocation," according to Plaintiff's Complaint.

SEVENTH SEPARATE DEFENSE

Defendant Cox did not owe Plaintiff any common law or statutory duty of care with respect to the matters alleged in Plaintiff's Complaint.

EIGHTH SEPARATE DEFENSE

Defendant Cox is not liable to Plaintiff and not legally obligated to pay for Plaintiff's injuries and damages resulting from the alleged deliberate, intentional, and criminal conduct by Defendant Barisone.

NINTH SEPARATE DEFENSE

Defendant Cox did not fail to exercise reasonable care to prevent a foreseeable risk of harm because the shooting by Defendant Barisone was not reasonably foreseeable.

TENTH SEPARATE DEFENSE

Any possible duty of care that Defendant Cox may have owed to Plaintiff was not breached by Defendant Cox.

ELEVENTH SEPARATE DEFENSE

Defendant Cox did not know and had no reason to anticipate a risk that Defendant Barisone would shoot or otherwise cause serious bodily harm to Plaintiff.

TWELFTH SEPARATE DEFENSE

Defendant Cox exercised due care at all times and in all matters mentioned in Plaintiff's Complaint, and Defendant Cox is not liable for any injuries and damages resulting from the intentional or negligent actions by Defendant Barisone.

THIRTEENTH SEPARATE DEFENSE

The shooting by Defendant Barisone was not a natural and probable consequence of any actions or inactions by Defendant Cox.

FOURTEENTH SEPARATE DEFENSE

Any possible negligence by Defendant Cox was not a proximate cause of the injuries and damages alleged by Plaintiff.

FIFTEENTH SEPARATE DEFENSE

Any possible negligence by Defendant Cox was not a substantial contributing cause of Plaintiff's alleged injuries and damages.

SIXTEENTH SEPARATE DEFENSE

Any possible negligence by Defendant Cox was only "a remote, trivial or inconsequential cause" of the injuries and damages sustained by Plaintiff. (Model Civil Jury Charge 6.13)

SEVENTEENTH SEPARATE DEFENSE

Even if there was some negligence by Defendant Cox, Plaintiff's alleged injuries and damages were directly, proximately, and solely caused by the superseding and intervening acts and conduct of Defendant Barisone who intentionally or negligently shot Plaintiff, thereby precluding Plaintiff from any recovery from Defendant Cox.

EIGHTEENTH SEPARATE DEFENSE

At all times mentioned in Plaintiff's Complaint, none of the actions or inactions by Defendant Cox were actuated by actual malice or accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions, and Plaintiff is not entitled to recover punitive damages from Defendant Cox.

NINETEENTH SEPARATE DEFENSE

Any recovery by Plaintiff must be reduced to the extent that any of Plaintiff's damages have been wholly or partly paid by collateral sources in accordance with the provisions of N.J.S.A. 2A:15-97.

TWENTIETH SEPARATE DEFENSE

Any recovery by Plaintiff must be reduced in the event of any failure by Plaintiff to mitigate her injuries and damages.

TWENTY-FIRST SEPARATE DEFENSE

Defendant Cox reserves the right to amend or supplement her answers to Plaintiff's Complaint and assert such additional affirmative defenses as may become apparent during the continuing course of discovery.

TWENTY-SECOND SEPARATE DEFENSE

Plaintiff's claims against Defendant Cox are barred by the provisions of the Comparative Negligence Act, N.J.S.A. 2A:15-5.1 to -5.8 of the New Jersey Statutes; or, in the alternative, any recovery should be diminished by the percentage of Plaintiff's negligence.

WHEREFORE, Defendant Ruth Cox demands judgment against Plaintiff, dismissing the Complaint with prejudice, together with costs of suit in accordance with the provisions of Rule 4:42.8, and such other relief as the court deems equitable and just.

ANSWER TO CROSSCLAIMS

Defendant Ruth Cox, for her answer to any and all crossclaims asserted against her, states as follows:

1. Defendant denies all crossclaims, including but not limited to all crossclaims for contribution and indemnification, that have been or will be asserted against her.
2. Defendant incorporates all of her separate defenses to the complaint as separate and affirmative defenses to all crossclaims that have been or will be asserted against her.

WHEREFORE, Defendant Ruth Cox demands judgment in her favor, and against any and all CROSS-CLAIM PLAINTIFFS, dismissing their claims with prejudice, and awarding Ruth Cox such other relief as the court deems equitable and just.

CROSS-CLAIM FOR CONTRIBUTION & INDEMNIFICATION

1. While denying any negligence or conduct that was a proximate cause of Plaintiff's injuries and damages in this matter, Defendant Cox demands contribution and indemnification from Defendant Barisone and each of the other co-defendants in accordance with the Comparative Negligence Act, N.J.S.A. 2A:15-5.1 to -5.8, the Joint Tortfeasors Contribution Law, N.J.S.A. 2A:53A-1 to -5, and Young v. Latta, 123 N.J. 584 (1991), with respect to any judgment entered against Defendant Cox.

2. Without admitting any liability herein, Defendant Ruth Cox claims complete common law and contractual indemnification from all co-defendants.

WHEREFORE, Defendant Ruth Cox demands judgment in her favor, and against any and all co-defendants, jointly and severally, and awarding her damages for contribution and/or indemnification, including but not limited to attorney's fees, costs of suit, and any other relief as the court deems equitable and just.

NOTICE OF REQUEST FOR ALLOCATION PURSUANT TO RULE 4:7-5(c)

Pursuant to Rule 4:7-5(c), Defendant Ruth Cox hereby advises that if any co-defendants presently named or hereafter named settle the within matter prior to the conclusion of trial, Defendant Cox will seek an allocation of the percentage of negligence, fault, and/or other liability by the fact finder against the settling defendant(s) and/or a credit in favor of Defendant Cox consistent with such allocation.

DEMAND FOR TRIAL BY JURY

Defendant Cox hereby demands a trial by jury on all issues in this matter.

DEMAND FOR STATEMENT OF DAMAGES CLAIMED

Pursuant to Rule 4:5-2, Defendant Cox requests a written statement specifying the amount of damages claimed by Plaintiff.

DEMAND FOR INTERROGATORY ANSWERS

Defendant Cox hereby demands answers to Form A. Uniform Interrogatories to be Answered by Plaintiff in All Personal Injury Cases (Except Medical Malpractice Cases) within the time period prescribed by the New Jersey Court Rules.

DEMAND FOR COPIES OF PLEADINGS AND DISCOVERY


Pursuant to Rule 1:5-1(a) and Rule 4:17-4(c), Defendant Cox demands that Plaintiff and each of the co-defendants serving pleadings and interrogatories and other discovery, and receiving answers thereto, serve copies of all such pleadings and answers to discovery requests received from other parties, including all papers, documents, photographs, and other discovery materials, upon the undersigned attorney for Defendant Cox. **PLEASE TAKE NOTICE** that this is a continuing demand.

DESIGNATION OF TRIAL ATTORNEY

Pursuant to Rule 4:25-4, John P. Graves, Esq., is hereby designated as trial counsel for Defendant Ruth Cox.

The Law Office of John P. Graves, LLC
Attorneys for Defendant, Ruth Cox

By:


JOHN P. GRAVES, ESQ.

DATED:

03/26/2020

CERTIFICATION

I, John P. Graves, of full age, hereby certify as follows:

1. I am an attorney at law in the State of New Jersey, and I represent Defendant Ruth Cox in this matter.
2. As required by Rule 4:5-1, (1) a Civil Case Information Statement is annexed as a cover sheet to this pleading; (2) to the best of my knowledge, the matter in controversy is not the subject of any other court action or arbitration proceeding now pending or contemplated, other than Sweet Grass Farms, LLC et al v. Michael Barisone et al., pending in New Jersey Superior Court, Morris County, Chancery Division, and State v. Michael Barisone, pending in New Jersey Superior Court, Morris County, Criminal Division; and (3) I am not aware of any non-party who should be joined in this action except for the unidentified "John Does" and "ABC Corporations" mentioned in Plaintiff's Complaint.
3. A copy of the within pleading was served and filed within the time allowed by Rule 4:6-1(c) and the written consent of the parties, which is being filed with this pleading.
4. Pursuant to Rule 4:5-1(b)(3), I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

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

The Law Office of John P. Graves, LLC
Attorneys for Defendant Ruth Cox

By:


JOHN P. GRAVES, ESQ.

DATED:

03/20/2020

Civil Case Information Statement

Case Details: MORRIS | Civil Part Docket# L -002250-19

Case Caption: KANAREK LAUREN VS BARISONE

MICHAEL

Case Initiation Date: 10/18/2019

Attorney Name: JOHN P GRAVES

Firm Name: JOHN P. GRAVES, LLC

Address: 18 MACCULLOCH AVE

MORRISTOWN NJ 07960

Phone: 9735347238

Name of Party: DEFENDANT : COX, RUTH

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Answer W/CrossClaim W/Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Business

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

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

03/26/2020

Dated

/s/ JOHN P GRAVES

Signed

