

SCHENCK PRICE SMITH & KING LLP

Mark K. Silver, Esq. (019752000)

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Attorneys for Defendant, Sweet Grass Farm, LLC

<p>LAUREN KANAREK,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>MICHAEL BARISONE, SWEET GRASS FARMS, LLC, RUTH COX, JOHN DOES 1-30; ABC Corporations 1-20</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.: MRS-L-2250-19</p> <p style="text-align: center;">Civil Action</p> <p style="text-align: center;">DEFENDANT SWEET GRASS FARM, LLC'S CROSS MOTION TO COMPEL A DATE CERTAIN FOR PLAINTIFF'S DEPOSITION</p>
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TO: Gregg Alan Stone, Esq.
Kirsch, Stone & Morgan
50 Park Place, Suite 401
Newark, New Jersey 07102
Attorneys for Plaintiff

PLEASE TAKE NOTICE that, on Friday, March 17, 2023, at 9:00 a.m., or as soon thereafter as counsel may be heard, Schenck, Price, Smith & King LLP, attorneys for Defendant, Sweet Grass Farm LLC (“Defendant”), shall move before the Superior Court of New Jersey, Law Division, at the Morris County Courthouse, Morristown, New Jersey, for an Order compelling Plaintiff’s deposition for a date certain.

PLEASE TAKE FURTHER NOTICE that Defendant shall rely on the accompanying Brief and Certification of Counsel, with exhibits.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 1:6-2, the undersigned requests oral argument if timely opposition is filed. A proposed form of order is annexed hereto.

SCHENCK PRICE SMITH & KING LLP
Attorneys for Defendant, Sweet Grass Farm, LLC

By: /s/ Mark K. Silver
Mark K. Silver, Esq.

Dated: March 9, 2023

SCHENCK PRICE SMITH & KING LLP

Mark K. Silver, Esq. (019752000)

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Attorneys for Defendant, Sweet Grass Farm, LLC

<p>LAUREN KANAREK,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>MICHAEL BARISONE, SWEET GRASS FARMS, LLC, RUTH COX, JOHN DOES 1-30; ABC Corporations 1-20</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.: MRS-L-2250-19</p> <p style="text-align: center;">Civil Action</p> <p style="text-align: center;">ORDER</p>
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THIS MATTER having been opened to the Court by Schenck, Price, Smith & King LLP, attorneys for Defendant Sweet Grass Farm, LLC (“SGF”), for an Order compelling Plaintiff’s Deposition for a Date Certain, by way of a Notice of Cross Motion duly filed and served upon all counsel, and the Court having considered the papers submitted herein, and for good cause having been shown;

IT IS ON this ____ day of _____, 2023:

ORDERED that Defendant’s Cross Motion to Compel Plaintiff’s Deposition for a Date Certain is hereby **GRANTED**; and it is further

ORDERED that Plaintiff’s Motion to Limit Deposition Testimony is hereby **DENIED**; and it is further

ORDERED that Plaintiff Lauren Kanarek is hereby Ordered to appear (via Zoom) for her deposition on April 13, 2023. Said deposition will continue day-to-day until complete; and it is further

ORDERED that should Plaintiff fail to appear on April 13, 2023 for deposition, counsel for Defendant shall thereafter submit an Order dismissing Plaintiff's Complaint under the Five Day Rule and without further motion practice; and it is further

ORDERED that a copy of this Order shall be served on all counsel within seven (7) days of the date of this Order.

Hon.

____ Opposed
____ Unopposed

SCHENCK PRICE SMITH & KING LLP

Mark K. Silver, Esq. (019752000)

220 Park Avenue

P.O. Box 991

Florham Park, New Jersey 07932

(973) 539-1000

Attorneys for Defendant, Sweet Grass Farm, LLC

<p>LAUREN KANAREK,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>MICHAEL BARISONE, SWEET GRASS FARMS, LLC, RUTH COX, JOHN DOES 1-30; ABC Corporations 1-20</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.: MRS-L-2250-19</p> <p style="text-align: center;">Civil Action</p> <p>CERTIFICATION OF MARK K. SILVER, ESQ. IN SUPPORT OF DEFENDANT SWEET GRASS FARM, LLC'S OPPOSITION TO MOTION TO LIMIT PLAINTIFF'S DEPOSITION AND IN SUPPORT OF CROSS-MOTION TO COMPEL A DATE CERTAIN</p>
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I, MARK K. SILVER, ESQ., of full age, do certify as follows:

1. I am an attorney-at-law of the State of New Jersey and a Partner with the law firm of Schenck, Price, Smith & King LLP, attorneys for Defendant Sweet Grass Farm, LLC ("SGF"). I am the attorney responsible for handling this matter. As such, I have personal knowledge of the facts set forth herein.

2. I make this Certification in support of SGF's Opposition to Plaintiff's Motion to Limit Plaintiff's Deposition and Cross-Motion to Compel a Date Certain.

3. A true and accurate copy of Plaintiff's Complaint filed on October 18, 2019 is annexed hereto as "**Exhibit A**".

4. A true and accurate copy of Judge Weaver's February 17, 2023 Case Management Order is annexed hereto as "**Exhibit B**".

5. A true and accurate copy of relevant excerpts of the March 30, 2022 Criminal Trial Testimony of Lauren Kanarek is annexed hereto as “**Exhibit C**”.

6. A true and accurate copy of a Lexis Nexis [REDACTED] Report is annexed hereto as “**Exhibit D**”.

I hereby certify, pursuant to Rule 1:4-4(b), 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.

SCHENCK PRICE SMITH & KING LLP
Attorneys for Defendant, Sweet Grass Farm, LLC

By: /s/ Mark K. Silver
Mark K. Silver

Dated: March 9, 2023

SCHENCK PRICE SMITH & KING LLP

Mark K. Silver, Esq. (019752000)
220 Park Avenue
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<p>LAUREN KANAREK,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>MICHAEL BARISONE, SWEET GRASS FARMS, LLC, RUTH COX, JOHN DOES 1-30; ABC Corporations 1-20</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.: MRS-L-2250-19</p> <p style="text-align: center;">Civil Action</p>
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**DEFENDANT SWEET GRASS FARM, LLC'S BRIEF IN OPPOSITION TO MOTION
TO LIMIT PLAINTIFF'S DEPOSITION AND CROSS-MOTION TO COMPEL
A DATE CERTAIN**

OF COUNSEL AND ON THE BRIEF:

Mark K. Silver, Esq. (019752000)
220 Park Avenue
P.O. Box 991
Florham Park, New Jersey 07932
(973) 539-1000

PRELIMINARY STATEMENT

Absurd. Lacking legal merit. Obstructionist. Frivolous. The Court can take its pick, but those descriptors (and several more that are not appropriate for legal papers) best describe Plaintiff's latest motion. When a Plaintiff files a civil suit in New Jersey, he/she agrees to be bound by the New Jersey Rules of Court. Not this Plaintiff. She continually acts as if the Rules of Court do not apply to her and seeks to make up new ones as the case progresses.

Prior to having been asked a single deposition question, Plaintiff has made a pre-emptive motion seeking to bar SGF from both: 1) asking questions about the incident that form the basis of her Complaint; AND 2) asking questions that support SGF's defenses related to Plaintiff's comparative fault. Essentially, Plaintiff is stating that she does not want to be deposed at all. The legal support provided by Plaintiff for this "unique" litigation position – none. Plaintiff filed a six-page "legal brief" without including a single case citation. Why? Because there is no legal support for this position.

Without using the actual legal term, Plaintiff is arguing that SGF should be "collaterally estopped" from deposing Plaintiff about the incident that forms the entire basis of her claim solely because she was asked about the incident during the attendant criminal trial. To be clear, SGF was not part of the criminal trial. SGF's interests were not represented in the criminal trial. The legal issues in the criminal trial were distinctly different from the legal issues in this case. SGF has distinct and different legal interests from Defendant Barisone. As a result of these inescapable facts, and as shown below, Plaintiff cannot establish any of the elements necessary to make an argument for collateral estoppel. Therefore, there is no legal basis to place limits on SGF's discovery deposition just because other parties have questioned her on the topic.

Moreover, Plaintiff's proposal for a bifurcation of her deposition is equally without merit and flies in the face of the long-recognized tenants of judicial economy. Nothing about Plaintiff and/or her case is special and/or novel. New Jersey's Rules of Court have a clear protocol with respect to depositions. SGF will ask questions and Plaintiff's counsel will object, where appropriate. All objections other than form and/or privilege are preserved for the time of trial (See R. 4:14-3). Plaintiff has not presented any evidence, let alone compelling evidence, why this case should deviate from the norm. Therefore, Plaintiff's motion should be denied in its entirety.

In addition to opposing Plaintiff's motion, Defendant SGF hereby cross moves to compel Plaintiff's deposition testimony on a date certain. The February 17, 2023, Case Management Order ("CMO") mandates Plaintiff's deposition be completed on or before March 31, 2023. Prior to the CMO being issued, and due to various scheduling conflicts of counsel, all parties agreed that Plaintiff would be deposed on April 13, 2023 and the deposition would continue day-to-day as necessary. This is technically outside the terms set by the CMO. SGF is always willing to provide professional courtesies to counsel so long as it does not suffer any prejudice as a result. While SGF has every confidence in Plaintiff's attorney and the ability of counsel to work together, given the history of obstructionist behavior, SGF does not have the same confidence in the Plaintiff herself. In an abundance of caution, SGF hereby moves for an Order compelling Plaintiff's deposition to take place on April 13, 2023 and continuing day-to-day as necessary. This modification to the CMO will not affect any other dates within the CMO and/or the completion of discovery. Alternatively, if the Court is not willing to bless the parties' modification of the Order, SGF asks for an Order compelling Plaintiff to appear for a deposition in compliance with the Order.

SGF joins in Plaintiff's request to have all of the issues resolved before the April 13, 2023 deposition date.

FACTS

Given the prior motion practice in this case, the Court is aware of the facts of this case. In sum, Plaintiff alleges that she was shot by Defendant Barisone on property owned by SGF. Plaintiff's Complaint against SGF sounds in: 1) strict premises liability (a Count that will be ripe for dismissal following Plaintiff's deposition); and 2) negligent security. (*See* Plaintiff's Complaint annexed to the Certification of Mark K. Silver, Esq. ("Silver Cert.") as "**Exhibit A**"). As previously stated, one of SGF's numerous defenses is that Plaintiff created the alleged dangerous condition that SGF is alleged to have failed to have protected her from and, therefore, SGF is not liable to Plaintiff.

ARGUMENT

I. SGF SHOULD NOT BE PREEMPTIVELY COLLATERALLY ESTOPPED FROM EXPLORING ISSUES IN A DISCOVERY DEPOSITION.

It is axiomatic that discovery in a case should be liberally granted. Under New Jersey's Rules of Court, SGF is entitled to take discovery on any matter that is not privileged and relevant to the litigation. R. 4:10-1. Plaintiff's motion posits that SGF should be estopped from asking questions to Plaintiff about the very issues of the case simply because some other attorneys asked her questions on the same subject. This unsupported suggestion is made in the face of years of legal precedent.

It is well settled that:

[f]or the doctrine of collateral estoppel to apply to foreclose the relitigation of an issue, the party asserting the bar must show that: (1) the issue to be precluded is identical to the issue decided in the prior proceeding; (2) the issue was actually litigated in the prior proceeding; (3) the court in the prior proceeding issued a final judgment on the merits; (4) the determination of the issue was essential to

the prior judgment; and (5) the party against whom the doctrine is asserted was a party to or in privity with a party to the earlier proceeding.:

[In re Estate of Dawson, 136 N.J. 1, 20-21, 641 A.2d 1026 (1994) (citations and parentheticals omitted).] It is equally clear that "[e]ven where these requirements are met, the doctrine, which has its roots in equity, will not be applied when it is unfair to do so." Pace v. Kuchinsky, 347 N.J. Super. 202, 215, 789 A.2d 162 (App. Div. 2002).

At the outset, collateral estoppel is usually determined at trial *after* all discovery has taken place. Here, Plaintiff seeks a preemptive determination attempting to preclude SGF from even taking discovery.

Second, no party has ever taken a discovery deposition of Plaintiff. The transcript of the criminal trial cross-examination of Plaintiff is littered with objections and limitation rulings because the trial court decided there were numerous areas of inquiry that were not relevant in the criminal case. Those same areas of inquiry are wholly relevant in this arena.

While SGF has the utmost respect for Barisone's defense team, they did not ask questions and/or fully explore issues in the same way that SGF intends to do. In response to Plaintiff's claim that "SGF cannot do a better or more thorough job of questioning Lauren.....than Barisone did in his criminal defense"¹, SGF's response is simple: "Yes it can. Just watch." Contrary to Plaintiff's framing of the issue, this is not a "narrow topic". There are dozens, if not hundreds, of Plaintiff's statements and actions that were not explored during the criminal trial that go directly to the issues of this case.

Moreover, SGF was not a party to the criminal action and has no legal alignment with any party in the criminal action. Although centered around the same factual nexus, the legal issues in the two actions are distinctly different. The criminal action was to determine the criminal culpability of Michael Barisone. Plaintiff was a mere witness in an action between the

¹ See Plaintiff's brief at page 5.

State of New Jersey and Michael Barisone. The civil action (as least as to SGF) is to determine whether SGF was negligent in failing to protect Plaintiff from the alleged danger (Michael Barisone). Plaintiff is a party in this action and her conduct is germane to the issues of culpability.

In general, to sustain a negligence claim, a plaintiff must prove the following elements: “(1) a duty of care, (2) a breach of that duty, (3) proximate cause, and (4) actual damages.” Townsend v. Pierre, 221 N.J. 36, 51, 110 A.3d 52 (2015) (quoting Polzo v. Cty. of Essex, 196 N.J. 569, 584, 960 A.2d 375 (2008)). None of those elements were explored in the criminal trial and, therefore, Plaintiff’s attempt to claim that SGF should be estopped from even asking questions fails from the inception.

Looking at the bigger picture of this case, Plaintiff’s attitude towards discovery in this case is best described as “obstructionist”. Even a casual review of the docket shows that SGF has had to file Motions to Compel Discovery against Plaintiff at every stage of this litigation. (*See Court Docket*).

SGF has no ill will and/or malice towards the Plaintiff. It has no desire nor intent to embarrass Plaintiff or cause her any pain. However, SGF is entitled to discovery in this case and SGF intends to fully explore the merits of the claims Plaintiff has lodged against it and SGF’s defenses to those claims. There is little doubt that SGF’s deposition questioning will enter into sensitive areas that may cause Plaintiff to revisit unpleasant times in her life (including the alleged shooting). SGF is not asking questions to intentionally cause the Plaintiff anguish, it is asking questions because it is entitled to challenge the veracity of Plaintiff’s claims. With Defendant Barisone claiming that he has no memory of the events at issue, Plaintiff and her boyfriend, Robert Goodwin are the only “eye witnesses” to the event. Given what has been

uncovered in discovery, their credibility is in significant doubt. In fact, by finding Michael Barisone not guilty in connection with the alleged assault on Robert Goodwin, the criminal jury affirmatively announced that they did not believe portions of Plaintiff and/or Goodwin's testimony. Without tipping its strategy for Plaintiff's deposition, SGF has identified numerous discrepancies between evidence produced in this litigation and Plaintiff's criminal trial testimony and SGF intends to explore all of them.

SGF will restate what it has stated in other papers. Discovery is not harassment. A deposition is a legitimate and necessary discovery instrument. Plaintiff initiated this lawsuit. If she is unwilling to sit for a full deposition and fully answer questions about the incident, the solution to that problem is for her to dismiss her claims. The solution is not for SGF to be deprived of its rights to a full and fair process.

II. BIFURCATION OF PLAINTIFF'S DEPOSITION IS UNNECESSARY AND AGAINST THE INTEREST OF JUDICIAL ECONOMY.

Plaintiff's attempt to bifurcate her deposition can only be interpreted as a delay tactic. In the February 17, 2023 Case Management Order, Judge Weaver's handwritten note made it clear that he would not take kindly to requests for further discovery extensions. Plaintiff's proposal flies in the face of the Court's admonition. (*See* February 17, 2023 Case Management Order annexed to the Silver Cert. as "**Exhibit B**").

Whether she likes it or not, Plaintiff's role in the creating of the conditions that led to her allegedly being shot is fully relevant to the litigation. Plaintiff proposes the Court set a briefing schedule for a purported Summary Judgment motion regarding Plaintiff's comparative fault. Plaintiff does not need the Court to set a briefing schedule. If she believes she has a viable Summary Judgment motion, she can file that motion at any time. She has not done so because Plaintiff knows full well: 1) there is no way that that such a motion is a pure question of law. It

will absolutely involve a question of fact; and 2) SGF's first response to any such motion will be that discovery is not complete, and Plaintiff has not been deposed on questions relevant to the motion.

For example, although SGF is not willing to tip its entire deposition strategy, for the purpose of making a record, it will give away this one piece for free. As stated above, it is one of SGF's defenses that Plaintiff created the alleged dangerous condition that SGF is alleged to have failed to have protected her from. It is also one of SGF's claims that Plaintiff is a habitual and persistent cyber-bully. She has a history, pattern, and practice of creating hostile environments using a variety of social media outlets. As cited in a previous brief, and in Plaintiff's own words:

Q. Now did you have a plan to destroy Michael Barisone?

A. At some point – Yes.

(See Silver Cert. at “**Exhibit C**”, March 30, 2022 Criminal Trial Testimony of Lauren Kanarek, pg. 89).

Q. Were you posting, in numerous posts, statements with regards to going to war?

A. Yeah.

(See Id. at pgs. 121-125).

This case is not an isolated incident. As shown in the attached report, Plaintiff had a prior “**██████████**” complaint filed against her for harassment tactics similar to the ones she employed in this case. (See Silver Cert. at “**Exhibit D**”, Lexis Nexis **██████████** **██████████** Report). The **██████████** incident is not the only one known to SGF.

In the interest of judicial economy Plaintiff's deposition should not be bifurcated and SGF should be allowed to ask of all of its question in a clear, concise and methodic manner.

Once a complete record is made, SGF is confident that the Court will recognize Plaintiff's role in creating the alleged dangerous condition that is an issue that absolutely must be decided by a jury.

III. PLAINTIFF'S DEPOSITION SHOULD BE ORDERED FOR A DATE CERTAIN.

As stated above, this cross-motion to compel Plaintiff's Motion for A Date Certain is made in an abundance of caution. The February 17, 2023, Case Management Order mandates Plaintiff's deposition be completed on or before March 31, 2023. Prior to the CMO being issued, and due to various scheduling conflicts of counsel, all parties agreed that Plaintiff would be deposed on April 13, 2023 and the deposition would continue day-to-day as necessary. This is technically outside the terms set by the CMO. SGF is always willing to provide professional courtesies to counsel so long as it does not suffer any prejudice as a result. Given the already existing motion practice surrounding Plaintiff's deposition and in an abundance of caution, SGF hereby moves for an Order compelling Plaintiff's deposition to take place on April 13, 2023 and continuing day-to-day as necessary. This modification to the CMO will not affect any other dates within the CMO and/or the completion of discovery. SGF makes this application because if a dispute arises during Plaintiff's deposition it does not want to be precluded from making an application for relief simply because the deposition date was not in technical compliance with the Court's CMO.

Finally, SGF joins in Plaintiff's request to have all of the issues resolved before the April 13, 2023 deposition date.

Respectfully submitted,

SCHENCK PRICE SMITH & KING LLP

/s/ Mark K. Silver

Mark K. Silver, Esq.

Dated: March 9, 2023

SCHENCK PRICE SMITH & KING LLP

Mark K. Silver, Esq. (019752000)

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Attorneys for Defendant, Sweet Grass Farm, LLC

<p>LAUREN KANAREK,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>MICHAEL BARISONE, SWEET GRASS FARMS, LLC, RUTH COX, JOHN DOES 1-30; ABC Corporations 1-20</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.: MRS-L-2250-19</p> <p style="text-align: center;">Civil Action</p> <p style="text-align: center;">CERTIFICATION OF SERVICE</p>
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I, MARK K. SILVER, of full age, hereby certifies as follows:

1. I am an attorney-at-law in the State of New Jersey and Partner with the law firm of Schenck, Price, Smith & King LLP, attorneys for Defendant Sweet Grass Farm, LLC (“Defendant”) in the above-captioned matter.

2. I submit this Certification in support of Defendant’s Cross Motion to Compel Plaintiff’s Deposition for a Date Certain and in Opposition to Plaintiff’s Motion to Limit Deposition Testimony.

3. I hereby certify that a true and accurate copy of Defendant’s Notice of Cross Motion, Brief in Support, Certification of Mark K. Silver, Esq. with exhibits, Proposed Form of Order, and this Certification of Service were electronically filed with the Morris County Superior Court on March 9, 2023.

4. I further certify that a true and accurate copy of the aforementioned documents was served on all parties of record via electronic filing on March 9, 2023.

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

SCHENCK PRICE SMITH & KING LLP
Attorneys for Defendant, Sweet Grass Farm, LLC

/s/ Mark K. Silver _____

Mark K. Silver

Dated: March 9, 2023

EXHIBIT A

BRUCE H. NAGEL
NJ ID NO.: 025931977
NAGEL RICE, LLP
103 Eisenhower Parkway
Roseland, NJ 07068
973-618-0400
Attorneys for Plaintiff

<p>LAUREN KANAREK,</p> <p style="text-align: right;">Plaintiff,</p> <p>v.</p> <p>MICHAEL BARISONE; SWEETGRASS FARMS, LLC; RUTH COX; JOHN DOES 1-30; ABC Corporations 1-20,</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION-MORRIS COUNTY DOCKET NO.:</p> <p>CIVIL ACTION</p> <p>COMPLAINT AND JURY DEMAND</p>
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Plaintiff Lauren Kanarek, a resident of Long Valley, New Jersey, by way of Complaint against the defendants, alleges and says:

FACTS COMMON TO ALL COUNTS

1. Upon information and belief, Michael Barisone is an individual resident of Long Valley, New Jersey.
2. Upon information and belief, Ruth Cox is an individual resident of North Carolina.
3. Upon information and belief, Sweetgrass Farms, LLC is a limited liability company operating in Long Valley, New Jersey.
4. On or about on August 7, 2019, Defendant Michael Barisone (hereinafter "Barisone" or "Defendant") confronted Kanarek and her fiancé on the porch of the farmhouse at 411 W. Mill Road, Long Valley, New Jersey.
5. Plaintiff was lawfully on the subject porch.

6. This confrontation followed an extended and protracted campaign by Defendants Barisone and/or Cox and/or Sweetgrass Farms, LLC and/or John Does 1-30 and/or ABC Corps 1-20, and their representatives, associates, friends, and/or agents, of harassing Plaintiff and her fiancée.

7. During the above-mentioned confrontation, without warning or provocation, Defendant Barisone shot Kanarek in the chest multiple times at point blank range.

8. Barisone was arrested, charged with multiple counts of attempted murder and weapons offenses, and is currently incarcerated in the Morris County Jail awaiting the criminal trial.

9. Upon information and belief, Defendants ABC Corps (1-10) and/or John Does (1-10) is the owner, managing agent, representative, and/or operator of the farm, residence, and/or facility where the subject shooting occurred. The identity of these Defendants are currently unknown.

10. Upon information and belief, Defendant Ruth Cox and/or John Does (11-20) owned, controlled, possessed, or otherwise maintained to hand gun utilized in this shooting. The identity of John Does (11-20) is currently unknown.

11. Upon information and belief, Defendants John Does (21-30) and ABC Corps (11-20) are Defendants whose identity is currently unknown, who are responsible for Plaintiff's injuries.

COUNT ONE
(Strict Liability)

12. Plaintiff repeats the allegations heretofore stated as though set forth at length herein.

13. Defendant Sweetgrass Farms, LLC and/or ABC Corps (1-10) and/or John Does (1-10) and/or Barisone is the owner, managing agent, controlling agent, managing representative, and/or operators of the farm, residence, and/or facility where the subject shooting occurred.

14. Defendants Sweetgrass Farms, LLC and/or ABC Corps (1-10) and/or John Does (1-10) and/or Barisone allowed, permitted, suffered, or otherwise condoned firearms to be present on their property.

15. Allowing firearms to be present on their property is an ultra-hazardous activity, which has the potential to seriously injure and/or kill innocent people.

16. As such, Defendants Sweetgrass Farms, LLC and/or ABC Corps (1-10) and/or John Does (1-10) and/or Barisone are strictly liable for all injuries caused by this.

WHEREFORE, Plaintiff demands judgment against all of the defendants jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT TWO
(Negligence)

17. Plaintiff repeats the allegations heretofore stated as though set forth at length herein.

18. Defendant Sweetgrass Farms, LLC and/or ABC Corps (1-10) and/or John Does (1-10) and/or Barisone is the owner, managing agent, controlling agent, managing representative, and/or operators of the farm, residence, and/or facility where the subject shooting occurred.

19. Defendants Sweetgrass Farms, LLC and/or ABC Corps (1-10) and/or John Does (1-10) and/or Barisone had a duty to provide a safe and sure location for the guests, business invitees, and social invitees, and/or residents, who visited and/or lived on and/or were legally present on the premises, including the Plaintiff.

20. Defendants Sweetgrass Farms, LLC and/or ABC Corps (1-10) and/or John Does (1-10) and/or Barisone were negligent in failing to do so.

21. As a direct and proximate result of the aforesaid negligence, carelessness, and/or omissions of defendants Sweetgrass Farms, LLC and/or ABC Corps (1-10) and/or John Does (1-10), and/or Barisone, individually and/or through their agents and/or servants, Plaintiff was caused to be injured.

22. As a direct and proximate result of said negligence, Plaintiff sustained severe and permanent personal injury, disability, pain and suffering, emotional distress, incurred and

will continue to incur medical expenses, has sustained past and future lost wages, and has otherwise suffered loss of enjoyment of life and will continue to suffer from such losses into the future.

WHEREFORE, Plaintiff demands judgment against all of the defendants jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT THREE
(Negligence as to Barisone)

23. Plaintiff repeat the allegations heretofore stated as though set forth at length herein.

24. Barisone was negligent and breached his duty owed to Plaintiff, resulting in him negligently injuring Plaintiff.

25. As a result of Barisone's negligence, Plaintiff sustained severe and permanent personal injuries, disability, pain and suffering, emotional distress, incurred and will continue to incur medical expenses, has sustained past and future lost wages, and has otherwise suffered loss of enjoyment of life and will continue to suffer from such losses into the future.

WHEREFORE, Plaintiff demands judgment against the defendants, jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT FOUR
(Assault and Battery as to Barisone)

26. Plaintiff repeat the allegations heretofore stated as though set forth at length herein.

27. The aforementioned conduct by Barisone constitutes and assault and battery upon Plaintiff.

28. As a result of Barisone's assault and battery, Plaintiff sustained severe and permanent personal injuries, disability, pain and suffering, and emotional distress, incurred and will continue to incur medical expenses, has sustained past and future lost wages, and has otherwise suffered loss of enjoyment of life and will continue to suffer from such losses into the future.

WHEREFORE, Plaintiff demands judgment against all of the defendants, jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT FIVE
(Negligence as to Defendant Ruth Cox and John Does (11-20))

29. Plaintiff repeat the allegations heretofore stated as though set forth at length herein.

30. Defendant Ruth Cox and/or John Does (11-20) owned, controlled, possessed, or otherwise maintained to hand gun utilized in this shooting. The identity of John Does (11-20) is currently not known.

31. Defendant Ruth Cox and/or John Does (11-20) negligently secured the subject weapon, and/or negligently

allowed and/or negligently permitted and/or negligent failed to prevent Barisone from obtained the subject weapon, and/or negligently entrusted Barisone with the subject weapon.

32. It is foreseeable that if Defendant Ruth Cox and/or John Does (11-20) negligently secured the subject weapon, and/or negligently allowed and/or negligently permitted and/or negligent failed to prevent Barisone from obtained the subject weapon, and/or negligently entrusted the weapon to Barisone, it could be or would be utilized to hurt someone else.

33. As a result of the above negligence of Defendant Ruth Cox and/or John does (11-20), Plaintiff sustained severe and permanent personal injuries, disability, pain and suffering, emotional distress, incurred and will continue to incur medical expenses, has sustained past and future lost wages, and has otherwise suffered loss of enjoyment of life and will continue to suffer from such losses into the future.

WHEREFORE, Plaintiff demands judgment against the defendants, jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT SIX
(Negligence Infliction of Emotion Distress)

34. Plaintiff repeat the allegations heretofore stated as though set forth at length herein.

35. As set out in the proceeding and subsequent counts, all Defendants were negligent.

36. All Defendants' negligence was the proximate cause of emotional harm to the plaintiff.

37. All Defendants owed a duty to the plaintiff.

38. It was foreseeable that all Defendants' negligence would cause extreme emotional distress to Plaintiff.

39. As a result of the above, Plaintiff sustained severe and permanent personal injuries, disability, pain and suffering, emotional distress, incurred and will continue to incur medical expenses, has sustained past and future lost wages, and has otherwise suffered loss of enjoyment of life and will continue to suffer from such losses into the future.

WHEREFORE, Plaintiff demands judgment against the defendants, jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT SEVEN
(Intentional Infliction of Emotion Distress)

40. Plaintiff repeat the allegations heretofore stated as though set forth at length herein.

41. As set forth in the proceeding counts, Defendants intended to inflict emotional distress on Plaintiff, or knew or should have known that emotional distress was the likely result of their conduct.

42. As a direct and proximate result of Defendants' conduct, Plaintiff suffered extreme emotional distress.

43. Defendants' conduct was extreme or outrageous.

44. The actions of the Defendant were the cause of the plaintiff's distress.

45. The emotional distress suffered by the plaintiff was severe.

46. As a result of the above, Plaintiff sustained severe and permanent personal injuries, disability, pain and suffering, emotional distress, incurred and will continue to incur medical expenses, has sustained past and future lost wages, and has otherwise suffered loss of enjoyment of life and will continue to suffer from such losses into the future.

WHEREFORE, Plaintiff demands judgment against the defendants, jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT EIGHT
(Punitive Damages)

47. Plaintiff repeat the allegations heretofore stated as though set forth at length herein.

48. The harm suffered by Plaintiff was the result of the Defendants' acts or omissions, as referenced above, and such acts or omissions 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.

49. As a result of the above, Plaintiff sustained severe and permanent personal injuries, disability, pain and suffering, emotional distress, incurred and will continue to incur medical

expenses, has sustained past and future lost wages, and has otherwise suffered loss of enjoyment of life and will continue to suffer from such losses into the future.

WHEREFORE, Plaintiff demands judgment against all of the Defendants, jointly, severally or in the alternative, for punitive damages, interest, costs of suit, and such other relief this Court deems just and equitable.

COUNT NINE

50. Plaintiff repeat and restates the allegations of the prior counts as if set forth at length herein.

51. John Does 21-30 and ABC Corps. 11-20 breached their duty of care owed to Plaintiff, and caused Plaintiff injury.

52. As a proximate result of the aforesaid negligence, Plaintiffs suffered severe, permanent injuries, pain, suffering, disability, impairment, loss of enjoyment of life, and economic damages.

WHEREFORE, Plaintiff demands judgment against the defendants, jointly, severally or in the alternative, for damages, interest, costs of suit, and such other relief this Court deems just and equitable.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues herein.

DISCOVERY DEMAND

Plaintiff hereby demands answers to Form C and C(2) Interrogatories within the time prescribed by the New Jersey Court Rules.

DEMAND FOR INSURANCE INFORMATION

Pursuant to R. 4:10-2(b), plaintiff hereby demands copies of the declaration pages of any and all insurance agreements by which any person carrying on an insurance business may be liable to satisfy part of all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Bruce H. Nagel, Esq. is hereby designated as trial counsel for plaintiff in the within action.

NAGEL RICE, LLP
Attorneys for Plaintiff

By: *Bruce H. Nagel*
BRUCE H. NAGEL

Dated: October 18, 2019

CERTIFICATION

I, BRUCE H. NAGEL, of full age, hereby certifies that:

I am an attorney at law in the State of New Jersey and a partner at the law firm Nagel Rice, LLP, attorneys for plaintiff in this action.

To the best of my knowledge, the matter in controversy is not the subject of any other action pending in any court or any pending arbitration proceeding.

No other actions or arbitration proceedings are contemplated by this plaintiff relating to this matter.

I know of no other parties that should be joined in this action at this time although it is anticipated that the names of various parties will be clarified after discovery.

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.

NAGEL RICE, LLP
Attorneys for Plaintiff

By: *Bruce H. Nagel*
BRUCE H. NAGEL

Dated: October 18, 2019

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: BRUCE H NAGEL

Firm Name: NAGEL RICE LLP

Address: 103 EISENHOWER PKWY

ROSELAND NJ 07068

Phone: 9736180400

Name of Party: PLAINTIFF : Kanarek, Lauren

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with 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

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: Friend/Neighbour

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

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)*

10/18/2019

Dated

/s/ BRUCE H NAGEL

Signed

EXHIBIT B

FILED

FEB 17 2023

David J. Weaver, J.S.C.
JUDGES CHAMBERS
MORRIS COUNTY COURTHOUSE

GREGG ALAN STONE, ESQ.
ID#: 000221987
KIRSCH, STONE & MORGAN
50 PARK PLACE - SUITE 401
NEWARK, NEW JERSEY 07102
Attorney for Plaintiff Lauren Kanarek
(973) 623-0100

LAUREN KANAREK,

Plaintiff(s),

VS.

MICHAEL BARISONE, SWEETGRASS
FARMS, LLC, RUTH COX, JOHN DOES
1-30, and ABC CORPORATIONS 1-20,

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY
DOCKET NO. MRS-L-2250-19

CIVIL ACTION

ORDER EXTENDING DISCOVERY

This matter having been brought before the Court on Motion of Gregg Alan Stone, Esq., of the law firm of Kirsch, Stone & Morgan, P.A, attorneys for plaintiff Lauren Kanarek for an Order to extend discovery, due notice of the application having been given to the attorneys for defendant(s) and the Court having read and considered all of the moving papers submitted, and for good cause shown,

IT IS ON THIS 17th DAY OF Feb 2023;

ORDERED as follows:

1. The parties are to serve additional written discovery requests on or before March 9, 2023;
2. Deposition of plaintiff Lauren Karanek to be completed on or before March 30, 2023;
3. Deposition of defendants Sweet Grass Farm and Michael Barisone to be completed on or before June 15, 2023;

- 4. Deposition of fact witnesses to be completed on or before June 15, 2023;
- 5. Plaintiff's liability and medical expert reports to be served on or before August 15, 2023;
- 6. Defendant's disability and medical expert reports to be served on or before October 15, 2023;
- 7. Expert depositions to be completed on or before December 15, 2023;
- 8. A case management conference be scheduled on or around July 1, 2023;
- 9. The discovery end date for this matter be extended to December 15, 2023;
- 10. A copy of this Order shall be served upon all counsel in this action within _____ days of the date hereof.

David J. Weaver, J.S.C.
DAVID J. WEAVER, J.S.C.

____ Opposed
 Unopposed

Good cause shown.

This is the 7th extension. Parties shall comply with all deadlines. Further extensions are highly unlikely.

EXHIBIT C

STATE OF NEW JERSEY v. MICHAEL L. BARISONE -- March 30, 2022
Testimony Only of Lauren Kanarek

Sheet 1

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, CRIMINAL PART
MORRIS COUNTY
INDICTMENT NO. 19-12-00999-I
APP. DIV. NO.

STATE OF NEW JERSEY,)	
)	TRANSCRIPT
Plaintiff,)	of
)	TRIAL TESTIMONY
vs.)	of
)	LAUREN KANAREK
MICHAEL L. BARISONE,)	
)	
Defendant.)	

Place: Morris Co. Courthouse
Washington & Court Sts.
Morristown, N.J. 07963

Date: March 30, 2022

BEFORE:

HONORABLE STEPHEN J. TAYLOR, P.J.S.C., AND JURY

TRANSCRIPT ORDERED BY:

MARK K. SILVER, ESQ. (Schenck Price Smith &
King, LLP, 220 Park Avenue, P.O. Box 991,
Florham Park, New Jersey 07932)

Transcriber Catherine Weigel
ELITE TRANSCRIPTS, INC.
14 Boonton Avenue
Butler, NJ 07405
(973) 283-0196
Audio Recorded
Operator, Alicia Roberts

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STATE OF NEW JERSEY v. MICHAEL L. BARISONE -- March 30, 2022
Testimony Only of Lauren Kanarek

Sheet 45

88

State v. Barisone

1 A I don't know the amount of monies that we're
2 claiming, but certainly for damages.

3 Q You basically want to take everything of
4 value away from Michael Barisone in that lawsuit,
5 correct?

6 A I just want him to cover medical expenses and
7 answer for the crime he committed in a civil court of
8 law.

9 Q And also get money, correct?

10 A If that ends up being a result of the suit, I
11 guess that's the result, but that's not the goal.

12 Q And all of that -- and correct me if I'm
13 wrong
14 -- is based on the fact that he shot you on August 7th,
15 correct?

16 A That he tried to murder me, yes.

17 Q Isn't it a fact that you, your boyfriend, and
18 your father were planning on suing Michael Barisone
19 prior to that?

20 A Not that I recall, but I don't remember what we'd
21 be suing him for prior to that, other than --

22 Q Do you recall talking to your dad about suing
23 him for approximately \$200,000?

24 A I do not, but -- I -- no, I don't recall that,
25 actually.

89

State v. Barisone

1 Q Is -- is it your sworn testimony that as you
2 sit here today you have no recollection, prior to the
3 shooting, of talking to either your boyfriend or your
4 father about suing Michael Barisone?

5 A It is my sworn testimony that I at this time do
6 not recall that, especially amounts.

7 Q Now did you have a plan to destroy Michael
8 Barisone?

9 A At some point, yes.

10 Q And isn't it a fact that you made a specific
11 threat saying that you intended to destroy everything
12 Mary Haskins loved and held dear?

13 A At some point, yes.

14 Q You made that statement for both Mr. Barisone
15 and Ms. Haskins to hear, correct?

16 A Correct.

17 Q And -- and would you agree with me that you
18 set out on a mission to try to do that, correct?

19 A At a certain point after being bullied, correct.

20 Q There's been testimony here that no one ever
21 really asked you to leave. Were you --

22 THE COURT: Mr. Bilinkas, you can refer to
23 other testimony to this witness.

24 MR. BILINKAS: I'll rephrase the question.

25 THE COURT: Strike that. Just ask a question

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STATE OF NEW JERSEY v. MICHAEL L. BARISONE -- March 30, 2022
Testimony Only of Lauren Kanarek

Sheet 61

120

State v. Barisone

1 of mind. It's entirely up to the jurors, but it's not
 2 introduced to somehow attack the character of Ms.
 3 Kanarek. It's not introduced as character evidence.
 4 It's only introduced for a limited purpose of how those
 5 postings may have impacted the state of mind of Mr.
 6 Barisone. That's the only reason The Court has -- has
 7 allowed the introduction of this evidence regarding Ms.
 8 Kanarek's possession or ownership of a firearm, but I
 9 will address it more at the end of the case.

10 All right, please proceed, Mr. Bilinkas.

11 BY MR. BILINKAS:

12 Q Ms. Kanarek, did you refer to yourself as
 13 John Wick (phonetic) in any posts?

14 A Maybe.

15 Q Who is John Wick?

16 A Uh, some like John Ruiz (phonetic).

17 Q It's a violent person?

18 A Um, my per-- I think it's a matter of perception.
 19 You could say that, I guess.

20 MR. SCHELLHORN: Judge, I --

21 BY MR. BILINKAS:

22 Q Did you call --

23 MR. SCHELLHORN: I'm going to object.

24 THE COURT: Mr. Bilinkas.

25 (Sidebar held off the record.)

121

State v. Barisone

1 BY MR. BILINKAS:

2 Q Were you posting, in numerous posts,
 3 statements with regards to going to war?

4 A Yeah.

5 Q Did you say things like if war cannot be
 6 avoided then the victorious war-- warrior must #win
 7 first #then go to war -- war, or words to that effect?
 8 A Yes, I believe I was quoting Sun Tzu, but I'm sure
 9 it's probably posted if it's hash tagged and posted.

10 Q Now with regards to your chess comments did
 11 you make a statement, every time I up my chess game I
 12 always become reminded that it is those who obsess
 13 about protecting their queen regardless of the outcome.
 14 We miss the hiding rook and always fail. Did you say
 15 something like that?

16 A Probably.

17 Q And -- and you were talking about Michael
 18 Barisone protecting his girlfriend, correct?

19 A Probably.

20 Q And in that same post did you say --

21 MR. SCHELLHORN: Can I ask what -- what date
 22 you're looking at, or page, or something?

23 MR. BILINKAS: Okay. This -- this is July
 24 12th, 2019.

25 BY MR. BILINKAS:

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STATE OF NEW JERSEY v. MICHAEL L. BARISONE -- March 30, 2022
Testimony Only of Lauren Kanarek

Sheet 62

122

State v. Barisone

1 Q And at the end of that post did you say, the
 2 king has been captured and -- and killed, and the whole
 3 entire castle comes crumbling down? Did you say that?

4 A Probably.

5 Q And that sometimes the queen must be
 6 sacrificed. Did you say that?

7 A Yes.

8 Q So will you admit, with regards to this post,
 9 you were talking about capturing and killing Michael
 10 Barisone, use -- with use of metaphors, of course,
 11 correct?

12 A I was definitely not talking about killing anyone.
 13 That would be false.

14 Q How about sacrificing the queen? Is that
 15 Mary Haskins?

16 A On -- on a board of chess, or of pieces knocked
 17 down, or moved over, sure.

18 Q On that same day did you post something, the
 19 beast hasn't yet met the napping beast inside me?

20 MR. SCHELLHORN: Objection. Same objection,
 21 Judge.

22 MR. BILINKAS: I'd say it's a threat, Judge.

23 THE COURT: I'm sorry?

24 MR. BILINKAS: I -- I'm saying because it's a
 25 threat.

123

State v. Barisone

1 THE COURT: No, I'll sustain the objection.

2 BY MR. BILINKAS:

3 Q Now during this time, when you're making
 4 these posts, you're telling numerous people on
 5 Facebook, that you're being bullied, correct?

6 A Yes.

7 Q And -- and you even tell them that you
 8 believe your life is being threatened.

9 A That's correct.

10 Q Now with regards to your posts, July 21st,
 11 2019, after posting all these things, and of which
 12 we've just gone over --

13 A Uh-huh.

14 Q -- did you say something to the effect that
 15 you're -- never be bluffing -- never be bluffing, not
 16 unless you're prepared to carry it out? Did you say
 17 words to that effect?

18 A I'm sorry, what date and what -- when -- when was
 19 this?

20 Q This -- this is July 21st, a couple of weeks
 21 before the shooting.

22 A Okay, there are some --

23 Q Did you make a statement basically saying
 24 you're not bluffing, or words to that effect?

25 A Maybe. I -- I don't know what the context was?

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STATE OF NEW JERSEY v. MICHAEL L. BARISONE -- March 30, 2022
Testimony Only of Lauren Kanarek

Sheet 63

124

State v. Barisone

1 MR. SCHELLHORN: What page is that? The top
2 right.
3 MR. BILINKAS: Oh. Oh, 1024.
4 MR. SCHELLHORN: Thank you.
5 BY MR. BILINKAS:
6 Q And on July 21st did you there, again, talk
7 about what you're saying not being a bluff, and that no
8 one with a brain in their head bluffs emptily, betting
9 literally you do, and just did, bye-bye! Did you say
10 that?
11 A Yes, I always usually end off with bye-bye or bye-
12 byes, so that makes sense.
13 Q When -- when you say you normally end with
14 bye-bye --
15 A Like to anybody, yes.
16 Q Now on July 23rd, a couple of days later, did
17 you use the term weapons hot?
18 A Yes.
19 Q July 25th did you post a post -- and -- and
20 this is when things are -- are really starting to get
21 crazy at the facility, correct?
22 A Yes. I'm sorry, I -- could you just go back to
23 the post a minute ago about --
24 Q I'm -- I'm moving on. I have a lot to go.
25 A Oh, okay, because I -- something seemed strange

125

State v. Barisone

1 with that. I wanted to just make sure it was me.
2 Q On -- on July 25th did you post, I will be.
3 It's about time to possibly go to war. Anyone who
4 repeatedly kicks a resting beast will eventually wake
5 her up.
6 A Probably, yes.
7 Q On the 27th did you say words to the effect
8 this is me, look out, 'cause here I come?
9 A Yes. I believe I was quoting a -- about the
10 circus movie with Hugh Jackman. It's like literally a
11 song.
12 MR. SCHELLHORN: Did you say what page that
13 was?
14 MR. BILINKAS: Page 14.
15 BY MR. BILINKAS:
16 Q Now --
17 A May -- may go there, too.
18 Q -- you were -- Are you okay?
19 A I'm just looking for the page that you said to
20 look out, 'cause here I come, that -- what page was
21 that?
22 Q That's not in your transcript.
23 THE COURT: No, I don't think that's in
24 there.
25 THE WITNESS: Oh, I don't -- I don't have it.

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EXHIBIT D



1 OF 1 RECORD(S)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]