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RECEIVED CIVIL DIVISION
SUPERIOR COURT OF NEW JERSEY
SOMERSET COUNTY

2016 APR 20 A 0:39

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CIVIL DIVISION

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TS

JEFFREY SCOZZAFAVA,

Plaintiff,

v.

SOMERSET COUNTY PROSECUTOR'S
OFFICE,

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
SOMERSET COUNTY
DOCKET NO.: L-536-16

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff Jeffrey Scozzafava, by way of Complaint against Defendant Somerset County Prosecutor's Office, states and alleges as follows:

PARTIES

1. Plaintiff Jeffrey Scozzafava is a natural person residing at 570 Montgomery Road, Hillsborough, New Jersey 08844. Mr. Scozzafava is employed by Defendant Somerset County Prosecutor's Office as a Detective.

2. Defendant Somerset County Prosecutor's Office ("SCPO") is a state law enforcement agency that includes several criminal investigatory units. SCPO is located at 40 North Bridge Street, Somerville, New Jersey 08876.

BACKGROUND FACTS

3. Plaintiff Jeffrey Scozzafava has a combined total of thirty-one (31) years' experience in law enforcement. From 1983 to 1986, Mr. Scozzafava served active duty in the U.S. Army as a Military Policeman. From 1987 to 2007, Mr. Scozzafava was employed as a

New Jersey State Police Trooper, serving as a uniform patrol Trooper and Detective. Mr. Scozzafava retired in 2007 with the rank of Detective Sergeant. Mr. Scozzafava also served 9 years in the NJSP Crime Scene Investigations South Unit and was a supervisor of Detectives in the Crime Scene Unit.

4. Over the course of his career with the New Jersey State Police, Mr. Scozzafava received extensive training and first-hand experience in forensics work, including bloodstain pattern analysis, fingerprint identification and crime scene investigation. Mr. Scozzafava's expertise qualified him as an expert witness in Federal and Superior courts, and allowed him to teach forensics for the Somerset County Prosecutors Office, the New Jersey State Police, the NJ Division of Criminal Justice, the United States Department of Justice, and many internationally-recognized forensics associations.

5. In August 2007, SCPO hired Mr. Scozzafava as a Detective and immediately assigned him to the Forensics Unit due to his expertise and experience in forensic investigations.

6. When Mr. Scozzafava began working for SCPO in August 2007, the Forensics Unit had forensically trained and experienced supervisors, which was a common and accepted practice in all modern law enforcement agencies.

7. Upon his hiring, Mr. Scozzafava received training from the NJ Department of Criminal Justice regarding Arson Investigation. After successfully completing the training, he became a member of the Somerset County Arson Task Force. Mr. Scozzafava subsequently investigated arsons without the need for supervision, authored fire investigation Origin and Cause reports, and testified in fire investigation depositions.

8. Between 2007 and 2010, the Forensic Unit provided exemplary forensic services to the people of Somerset County.

9. In 2010, the Forensic Unit Lieutenant, Barry Jansen, retired. The Forensic Unit Sergeant, Lee Niles, was promoted to Lieutenant, but the first line supervisor position of Sergeant was not replaced and remains void to the present date. As such, the Forensic Unit Detectives have no first line supervisor.

10. In 2013, Lieutenant Niles was promoted to Captain, although he is not trained in forensics. Sergeant Joseph Walsh from the Burglary Unit was promoted to Lieutenant. Likewise, Sergeant Walsh is not trained in forensics.

11. In late 2013, Chief of Detectives Timothy Fitzgerald held an Office staff meeting. He announced that newly promoted Lieutenant Walsh would be assigned to the Forensic Unit. Further, newly promoted Captain Niles would remain in the Forensic Unit to “show Lieutenant Walsh the ropes”. There has never been a Captain nor a Lieutenant assigned to the Forensic Unit without forensic training or experience.

12. In February 2014, Mr. Scozzafava told Chief of Detectives Tim Fitzgerald that he was concerned regarding the work product of the Forensics Unit, as it did not have forensically-trained supervisors. Chief Fitzgerald was openly irritated and stormed out of Mr. Scozzafava’s office, stating “you’re killing me!”

13. Shortly thereafter, Lt. Walsh transferred the Dodge Durango SUV that had been assigned to Mr. Scozzafava for several years to a newly-hired Detective, W. Federico. Lt. Walsh assigned Mr. Scozzafava a spare Chevy Impala, without lights or siren, making Mr. Scozzafava the first SCPO detective to be downgraded in vehicle assignments and the first non-undercover Detective to be assigned a vehicle lacking lights or siren.

14. This additionally made Mr. Scozzafava the only SCPO detective to lack an SUV for transporting bulky crime scene and arson investigation processing equipment. Detective W. Federico, who received Mr. Scozzafava’s SUV, only used the vehicle for a few weeks before

being reassigned to a newer SUV. Mr. Scozzafava, however, continued to be assigned to a spare car without emergency lights or siren while his original SUV sat idle in the spare pool.

15. Throughout 2014, Mr. Scozzafava observed Capt. Niles and/or the Forensics Unit failing to collect and preserve evidence in compliance with forensics protocols. His observations included, but were not limited to, the following:

- (a) In April 2014, Mr. Scozzafava, along with other Arson Task Force personnel, observed Capt. Niles removing carpet as part of the Dranko homicide and arson investigation. Although the carpet was to be tested for trace biological evidence, Capt. Niles improperly cut and collected the evidence bare-handed using a non-sterile box cutter.
- (b) In 2014, Mr. Scozzafava was examining a suspect's vehicle pursuant to a search warrant issued in relation to a bank robbery. Capt. Niles interrupted Mr. Scozzafava and took part in the examination with Forensics Technician Barry Jansen. Mr. Jansen found stolen money under a passenger side car seat, which he gave to Capt. Niles. However, neither Mr. Jansen nor Capt. Niles wrote a report regarding locating the money, as required.

Later, in 2014, the bank robbery case was set to go to trial. Pre-trial, Capt. Niles approached Mr. Scozzafava and asked him to tell the Assistant Prosecutor on the case that Mr. Scozzafava himself had found the money. Mr. Scozzafava refused to lie, and Capt. Niles was forced to testify at the bank robbery trial, even though he had authored no investigation, supplementary or laboratory reports. Thereafter, Capt. Niles's demeanor towards Mr. Scozzafava became brusque.

- (c) In September of 2014, Mr. Scozzafava was out-of-state when the Forensics Unit was called upon to investigate an alleged arson and homicide at the residence of John Sheridan. When Mr. Scozzafava returned to work at the Forensics Unit, he observed unsealed and unlabeled evidence from the Sheridan investigation in the fingerprint lab and vehicle bay. This included a large piece of charred bedding lying exposed on the vehicle bay floor on a piece of brown paper and charred bedding stored in an open

bag in the fingerprint lab. Although Mr. Scozzafava voiced his concerns to Lt. Walsh regarding the evidence not being properly packaged and secured, the evidence remained in its place for several weeks.

- (d) In October of 2014, Capt. Niles represented to Assistant Prosecutor Brian Stack that points of entry at the Sheridan crime scene had been processed for fingerprints using the “flashlight technique”. Mr. Scozzafava knew that no such “flashlight technique” existed in the forensic or scientific community and was an obvious excuse for nonfeasance during scene processing. AP Stack ordered Captain Niles to buy a similar doorknob and demonstrate the processing technique. On the day of the demonstration, Captain Niles took the day off, leaving the demonstration to Lt. Walsh. Lt. Walsh consulted with Mr. Scozzafava regarding what camera settings to use when photographing an oily fingerprint on a door knob. Shortly thereafter, the SCPO press release on the Sheridan investigation stated that the interior of the crime scene had been processed for fingerprints utilizing various “lighting techniques”.
- (e) In late 2014, Mr. Scozzafava observed that blood collection swabs, stored adjacent to the Sheridan bedding, had been improperly packaged by Forensic Technician Kevin Parmelee. The evidence envelopes were shoddily taped, leaving open gaps that created the potential for contamination.

16. Mr. Scozzafava complained to Lt. Walsh regarding many of the foregoing forensics failures, including but not limited to Capt. Niles’s handling of evidence collection in the Dranko and Sheridan matters and Det. Parmelee’s improper packaging of evidence. Lt. Walsh agreed with Mr. Scozzafava’s concerns but claimed he could do nothing about it and “that’s the cards we’ve been dealt”.

17. In late Fall of 2014, Mr. Scozzafava discovered that the Dodge Durango SUV which Lt. Walsh had transferred from Mr. Scozzafava was sitting unused in the Narcotics Unit parking lot. Accordingly, Mr. Scozzafava called Deputy Chief of Detectives Steven Ughetta and requested assignment to the vehicle. Deputy Chief Ughetta approved the request.

18. Weeks later, on December 5, 2014, Mr. Scozzafava was acting as lead instructor of the SCPO 3-day annual forensic photo course. With a half day still left in the course, including the final test and completion proceedings, Lt. Walsh called Mr. Scozzafava and ordered him to immediately stop teaching, locate the spare Chevy Impala at the county garage, and exchange it for his Durango SUV. Mr. Scozzafava protested that he was teaching a class. Nonetheless, Lt. Walsh reiterated his order, stating it was “not his call” and that Mr. Scozzafava needed to make the exchange then-and-there because someone was coming to collect the vehicle by day’s end.

19. To his embarrassment, Mr. Scozzafava apologized to the attendees, withdrew from his teaching assignment, and turned the course over to an assistant. He obtained a ride to the county garage to take the spare car without lights or siren, and transferred his equipment from one car to the other. Although he had the SUV and keys ready for turning over as Lt. Walsh instructed, no one showed up at day’s end to claim the vehicle. Rather, the SUV sat in the Forensic Unit parking lot for three days before it was collected.

20. On or around December 9, 2014, Mr. Scozzafava again voiced his concerns to Lt. Walsh regarding the improper packaging of blood collection swabs, and the charred bedding evidence from the Sheridan investigation still remaining sitting in a paper bag on a counter without proper storage. Lt. Walsh stated to Mr. Scozzafava that “we got to get that stuff out of here”, yet took no action.

21. Subsequently in December, 2014, Mr. Scozzafava located a ten year old Durango SUV sitting unused and parked at the Narcotics Unit. Mr. Scozzafava requested assignment to the vehicle and Deputy Chief Ughetta gave him permission to switch. After getting the vehicle serviced, Mr. Scozzafava was then able to use it to store his crime scene and arson investigation equipment.

22. On or around January 30, 2015, Mr. Scozzafava was working in the SCPO Forensic Unit photo lab with the door to the hallway open. He observed Capt. Niles walk past, enter the fingerprint lab, then exit with the paper bag containing the charred bedding from the Sheridan investigation. Mr. Scozzafava then walked into the vehicle bay and observed Capt. Niles walking to a garbage dumpster located in the parking lot and disposing of the bag containing the Sheridan evidence. It was common knowledge and a topic of conversation among Detectives assigned to the Forensic Unit that the Sheridan evidence was improperly collected, improperly preserved and subsequently destroyed.

23. On or around February 19, 2015, Mr. Scozzafava emailed Lt. Walsh, requesting a status update on an email he had sent to Lt. Walsh earlier on December 16, 2014. In that email, Mr. Scozzafava expressed that he needed additional information in order to move forward with analyzing fingerprint evidence regarding the Sheridan homicide investigation.

24. The very next day, February 20, 2015, Mr. Scozzafava was notified by email from Chief of Detectives Timothy Fitzgerald that he was being transferred from the Forensics Unit to the Fugitive Unit. Mr. Scozzafava was shocked, as SCPO had hired him specifically for his expertise in forensics. When he asked Lt. Walsh for the reason why he was being transferred, Lt. Walsh replied, "everybody does time in the penalty box."

25. Mr. Scozzafava was transferred to the Fugitive Unit in March of 2015. Less than a week after his transfer, his Fugitive Unit supervisor, Lieutenant Robert Bryant, informed Mr. Scozzafava that he had received a call from Lt. Walsh. Lt. Bryant told Mr. Scozzafava that, per Lt. Walsh's orders, he was once again to exchange his SUV for the spare Impala that lacked lights and siren.

26. From March through October 2015, Mr. Scozzafava performed his duties as a Detective assigned to the Fugitive Unit.

27. On or around October 13, 2015, Mr. Scozzafava had occasion to meet Chief of Detectives Fitzgerald and Deputy Chief of Detectives Ughetta in the Chief's office. Having never been given an explanation as to why he was transferred, Mr. Scozzafava asked Chief Fitzgerald for the reason. Chief Fitzgerald informed Mr. Scozzafava that Capt. Niles had told him that Mr. Scozzafava couldn't get along with Detective Parmelee, and that "things were coming to a head." Chief Fitzgerald further informed Mr. Scozzafava that he had asked Capt. Niles who he wanted transferred to fix the problem, and Capt. Niles had said "Scozzafava".

28. Mr. Scozzafava was astonished, as there was no conflict between himself and Det. Parmelee necessitating a transfer. The next day he met with his supervisor, Lt. Bryant, requesting a personal meeting with Prosecutor Soriano regarding being retaliated against.

29. Mr. Scozzafava met jointly with Chief Fitzgerald and Prosecutor Soriano in late October, 2015. Mr. Scozzafava informed both men that he had repeatedly complained to Lt. Walsh about the improper storage and destruction of evidence in the Sheridan case, the improper collection of evidence in the Dranko case, the improper packaging of blood samples, and the lack of Arson Task force training, among other deficiencies. He also informed them that he had refused Capt. Niles's request to lie for him in regards to the bank robbery trial of 2014. Finally, he expressed his reasonable belief that his transfer was in retaliation for voicing his complaints.

30. Mr. Soriano responded that he "needed time to digest" the information. The meeting ended with Prosecutor Soriano telling Mr. Scozzafava, "I'll get back to you soon".

31. During the first week of November 2015, Captain of County Detectives Brian Hoey met with Mr. Scozzafava and took his statement as part of an internal investigation initiated by the SCPO. Again, Mr. Scozzafava described deficiencies in the collection and storage of evidence by the Forensics Unit, as well as the vehicle demotions and unit transfer he experienced in retaliation for voicing his complaints.

32. In late November 2015, the Somerset County Police Academy requested Mr. Scozzafava to teach the SCPO annual three-day forensic photo course. In advance of the course, Mr. Scozzafava asked Police Academy Sgt. William Brown for access to the forensics lab to prepare and conduct class. Sgt. Brown responded that Lt. Walsh denied Mr. Scozzafava access to the lab and directed him to hold the class at the Police Academy.

33. Accordingly, Mr. Scozzafava went to the police academy to begin preparations. However, Police Academy Director Richard Celeste decided it was unwieldy and inefficient to hold the course at the Academy when the forensics lab contained all the relevant equipment for instruction. As such, Director Celeste called the SCPO to request access to the forensics lab.

34. Director Celeste then reported back to Mr. Scozzafava that, to his great surprise, the SCPO told him the course was cancelled. This was the first time in Mr. Scozzafava's employment with the SCPO that the annual photo course was cancelled. To his embarrassment, Det. Scozzafava had to call his co-instructors and the New Jersey State Police to inform them the class was off.

35. In January of 2016, the SCPO announced multiple inter-office transfers. However, Mr. Scozzafava was not transferred back to the Forensics Unit and continues to work in the Fugitive Unit. To this date, neither Prosecutor Soriano nor Chief of Detectives Fitzgerald has contacted Mr. Scozzafava regarding his transfer.

36. Defendant's stated reason for transferring Mr. Scozzafava – namely, that things were "coming to a head" between Mr. Scozzafava and Det. Parmelee – was entirely bogus and a pretext for unlawful retaliation. Defendant transferred Mr. Scozzafava for one reason alone: in retaliation for his whistle-blowing conduct in lodging complaints regarding deficient and improper evidence collection and casework by the Forensics Unit, particularly by his supervisor,

Capt. Niles. Mr. Scozzafava has endured additional and continued retaliation in the form of vehicle demotion, cancelled classes, and open hostility from Capt. Niles.

COUNT I – VIOLATION OF CEPA

37. Plaintiff hereby incorporates and restates the allegations contained in the preceding Paragraphs as set forth at length herein.

38. Defendant subjected Mr. Scozzafava to an adverse employment action in retaliation for protected whistle-blowing conduct in violation of the New Jersey Conscientious Employee Protect Act, N.J.S.A. 34:19-1 et seq. (CEPA).

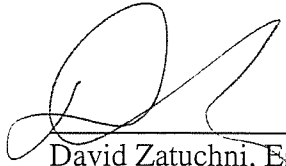
39. As a result of Defendant's unlawful conduct, Mr. Scozzafava has been subjected to job detriment and economic losses.

40. As a result of Defendant's unlawful conduct, Mr. Scozzafava has been subjected to mental anguish, embarrassment, stress, anxiety, and humiliation and other pain and suffering.

WHEREFORE, Plaintiff demands the following damages and relief:

- a. Judgment in favor of the plaintiff and against the defendants;
- b. Compensatory damages;
- c. Punitive damages;
- d. Attorneys fees;
- e. Costs of suit;
- f. Any such additional relief as this Court deems just and equitable.

Respectfully submitted,



David Zatuchni, Esq.
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287 South Main Street
(Route 29)
Lambertville, NJ 08530
Attorneys for Plaintiff

Dated: April 18, 2016

CERTIFICATION PURSUANT TO R. 4:5-1

I hereby certify that this matter in controversy is not the subject of other actions pending in any court or arbitration proceedings, or any such contemplated other actions or arbitration proceedings.



David Zatuchni, Esq.
Zatuchni & Associates, LLC
287 South Main Street
(Route 29)
Lambertville, NJ 08530
Attorneys for Plaintiff

Dated: April 18, 2016

DESIGNATION OF TRIAL COUNSEL

David Zatuchni, Esq. is hereby designated as trial counsel in this matter.



David Zatuchni, Esq.
Zatuchni & Associates, LLC
287 South Main Street
(Route 29)
Lambertville, NJ 08530
Attorneys for Plaintiff

Dated: April 18, 2016

JURY DEMAND

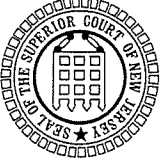

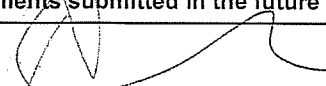
Plaintiff hereby demands a trial by jury on all issues and claims.



David Zatuchni, Esq.
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Dated: April 18, 2016

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), 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 David Zatuchni		TELEPHONE NUMBER (609) 243-0300	COUNTY OF VENUE Somerset
	FIRM NAME (if applicable) Zatuchni & Associates		DOCKET NUMBER (when available) <div style="font-size: 1.2em; font-family: cursive;">L-536-16</div>	
	OFFICE ADDRESS 287 South Main Street Lambertville, NJ 08530		DOCUMENT TYPE Complaint JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Jeffrey Scozzafava		CAPTION Jeffrey Scozzafava v. Somerset County Prosecutor's Office		
CASE TYPE NUMBER (See reverse side for listing) 616	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) <div style="text-align: right;"> <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN </div>		
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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input checked="" 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 checked="" type="checkbox"/> YES <input type="checkbox"/> 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? <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</i> 1:38-7(b).				
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)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOLIN | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 291 PELVIC MESH/GYNECARE |
| 278 ZOMETA/AREZIA | 292 PELVIC MESH/BARD |
| 279 GADOLINIUM | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 288 PRUDENTIAL TORT LITIGATION | 601 ASBESTOS |
| 289 REGLAN | 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