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Attorneys for Defendant Hillary Goldberg

NJ PUPPY STORE t/a WAYNE PUPPIES

Plaintiff,

v.

TOWNSHIP OF TEANECK, CURTIS
CAVINESS, CHIEF REGISTERED and
HEALTH DEPARTMENT TOWNSHIP
MANAGER, and HILLARY GOLDBERG

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY
DOCKET NO.: BER-L-001240-23

Civil Action

**ANSWER, DEMAND FOR DISCOVERY,
and JURY DEMAND**

Hillary Goldberg, by way of Answer to the Complaint of NJ Puppy Store t/a Wayne Puppies, says:

NATURE OF THIS ACTION

1. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

2. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

3. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

4. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

5. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

6. Denied.

7. Denied.

THE PARTIES

8. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

9. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

10. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

11. Denied.

12. Denied.

FACTS COMMON TO ALL COUNTS

13. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

14. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg,

no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

15. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

16. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

17. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

18. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

19. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

20. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

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22. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

23. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

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25. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

26. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

27. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

28. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

29. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

30. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

31. Denied.

32. Denied.

33. Denied.

34. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

35. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

36. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

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Plaintiff to its proofs.

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no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

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44. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

45. Denied.

46. Denied.

47. Denied.

48. Denied.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

53. Admitted.

54. Admitted.

55. Denied.

56. Denied.

57. Denied.

FIRST COUNT

58. Hillary Goldberg repeats her responses to the prior paragraphs as if fully set forth herein.

59. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

60. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

61. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

62. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

63. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg,

no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

64. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

65. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

SECOND COUNT

[Second] 60. Hillary Goldberg repeats her responses to the prior paragraphs as if fully set forth herein.

[Second] 61. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

[Second] 62. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

[Second] 63. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

[Second] 64. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

[Second] 65. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

THIRD COUNT

66. Hillary Goldberg repeats her responses to the prior paragraphs as if fully set forth herein.

67. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

68. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

69. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

70. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

71. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves Plaintiff to its proofs.

72. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

73. Inasmuch as the allegations in this paragraph are not directed to Hillary Goldberg, no response is necessary. To the extent a response is necessary, Hillary Goldberg denies and leaves

Plaintiff to its proofs.

FOURTH COUNT

74. Hillary Goldberg repeats her responses to the prior paragraphs as if fully set forth herein.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

79. Denied.

FIFTH COUNT

80. Hillary Goldberg repeats her responses to the prior paragraphs as if fully set forth herein.

81. Denied.

82. Denied.

83. Denied.

SIXTH COUNT

84. Hillary Goldberg repeats her responses to the prior paragraphs as if fully set forth herein.

85. Denied.

86. Denied.

87. Denied.

AFFIRMATIVE DEFENSES

- First. Plaintiff's Complaint fails to state a claim upon which relief can be granted.
- Second. Ms. Goldberg asserts her First Amendment right to freedom of speech regarding their opinions.
- Third. Ms. Goldberg asserts her First Amendment right to petition the government for redress and the legal protections of their statements made pursuant thereto.
- Fourth. Ms. Goldberg denies that any statements made were defamatory.
- Fifth. Ms. Goldberg is protected by the Fair Reporting Privilege.
- Sixth. The statements made by Ms. Goldberg were true and thus, not defamatory.
- Seventh. The statements made by Ms. Goldberg were substantially true, and thus, not defamatory.
- Eighth. The statements made by Ms. Goldberg asserts her were opinion, and thus, not defamatory.
- Ninth. The statements made by Ms. Goldberg are protected by qualified privileges.
- Tenth. The statements made by Ms. Goldberg were made in good faith.
- Eleventh. Plaintiff was not damaged by the statements made by Ms. Goldberg.
- Twelfth. Plaintiff is not entitled to punitive damages under the claims asserted here.
- Thirteenth. Plaintiff was a public figure and thus, the statements made by Ms. Goldberg are not actionable.
- Fourteenth. Plaintiff was a limited purpose public figure, and thus, the statements made by Ms. Goldberg are not actionable.
- Fifteenth. The statements made by Ms. Goldberg were made regarding a legitimate public

concern.

Sixteenth. The statements made by Ms. Goldberg were not made with actual malice.

Seventeenth. The statements made by Ms. Goldberg were not made with reckless disregard for whether they were true or false.

Eighteenth. Inasmuch as Plaintiff has represented that it would not be selling animals in Teaneck, Ms. Goldberg did not interfere with any prospective economic advantage.

Nineteenth. The damages sought by Plaintiff are speculative, and therefore, not recoverable.

Twentieth. Ms. Goldberg did not tortiously interfere with business relationships.

WHEREFORE HAVING FULLY ANSWERED, DEFENDANT HILLARY GOLDBERG DEMANDS THAT THE COMPLAINT BE DISMISSED AGAINST HER WITH AN AWARD OF COSTS AND FEES.

JURY DEMAND

Ms. Goldberg demands a trial by jury on all issues involved herein.

TRIAL COUNSEL DESIGNATION

Pursuant to Rule 4:25-4, John D. Coyle, Esq. is hereby designated as trial counsel in the within matter on behalf of Ms. Goldberg.

RULE 4:5-1 CERTIFICATION

I hereby certify that the matter in controversy is not the subject of any other action pending in any other Court or of a pending arbitration proceeding, nor is it contemplated that the matter in controversy will be the subject of any other action or arbitration proceeding. I further certify that I am not presently aware of the identity of any other party whose joinder is required by law.

RULE 1:38-7 CERTIFICATION

I hereby certify that all confidential personal identifiers have been redacted and that subsequent papers submitted to the court will not contain confidential personal identifiers in

accordance with the provisions of this rule.

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1, Defendant Hillary Goldberg serves the following requests for answers to interrogatories with this pleading. Responses are due within the time calculated in Rule 4:17-4(b), 60 days after service of the summons and complaint:

1. Identify all documents relating in any way to any violations, or notices of potential violations, of the Pet Purchase Protection Act.
2. Identify any and all complaints, whether oral, email, written, or otherwise recorded, regarding the health of any animals purchased by customers from Plaintiff since January 1, 2015.
3. Identify any and all animals sold by Plaintiff since January 1, 2015 and for each animal:
 - a. Identify the name, street address, and license numbers for each animal's breeder and broker;
 - b. Identify the date and place of each animal's birth;
 - c. The medical background for the animal;
 - d. The date and name of the veterinarian that performed the animal's initial examination;
4. For each breeder and broker set forth in response to Interrogatory 3 and subparts:
 - a. Set forth all steps taken by Plaintiff to determine the conditions under which animals purchased are kept and/or maintained.
 - b. Set forth all steps taken by Plaintiff to determine if the breeder and/or broker had been the subject of any complaints regarding the conditions of the animals sold by the breeder and/or broker.
5. Has Plaintiff received any requests from consumers for complete and/or partial refunds of the amounts paid for animals purchased from Plaintiff since January 1, 2015?
6. If the answer to 5 is yes, set forth the: a) date of the request; b) person requesting the refund; c) reason for the refund; d) amount of the refund request; e) reason provided for the refund request; and f) outcome of the refund request.

7. Identify all claimed false statements about Wayne Puppies made by Hillary Goldberg.
8. For each statement identified in response to Interrogatory 7, set forth the place, date, and manner in which the statement was made.
9. Identify any and all prospective economic opportunities that Plaintiff has lost as a result of the conduct alleged in the complaint to have been committed by Hillary Goldberg
10. Identify any and all injuries that have been inflicted on Plaintiff as a result of the conduct alleged in the complaint to have been committed by Hillary Goldberg.
11. Identify all persons with relevant knowledge of the claims in the Complaint and for each person identified, set forth:
 - a. Their address and telephone number;
 - b. The basis of their knowledge;
 - c. A description of their knowledge.

DEMAND FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 4:18-1, Defendant Hillary Goldberg serves the following requests for the production of documents with this Complaint. Responses are due within the time calculated in Rule 4:18-1(b)(2), 50 days after service of this pleading:

- 1 Produce a copy of all documents identified or referenced in your answers to interrogatories.
- 2 Produce a copy of all income tax returns for Plaintiff from 2013 to the present.
- 3 Produce a copy of all income statements for Plaintiff from 2013 to the present.
- 4 Produce a copy of all profit and loss statements for Plaintiff from 2013 to the present.

COYLE & MORRIS LLP

Dated: June 5, 2023

s/ John D. Coyle

John D. Coyle
Attorney ID: 029632001

201 Littleton Road, Suite 210
Morris Plains, NJ 07950
(973) 370-3519
jcoyle@coylemorris.com
Attorneys for Defendant Hillary
Goldberg



New Jersey Judiciary
Civil Practice Division

Civil Case Information Statement (CIS)

Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 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"/> check <input type="checkbox"/> charge <input type="checkbox"/> cash | Charge/Check Number | Amount \$ | Overpayment \$ | Batch Number |
| Attorney/Pro Se Name John D. Coyle, Esq. | Telephone Number 9733700592 | ext. | County of Venue Bergen <input type="button" value="v"/> | |
| Firm Name (if applicable) Coyle & Morris LLP | Docket Number (when available) BER-L-001240-23 | | | |
| Office Address - Street 201 Littleton Road, Suite 210 | City Morris Plains | State NJ | Zip 07950 | |
| Document Type Answer | Jury Demand <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| Name of Party (e.g., John Doe, Plaintiff) Hillary Goldberg, Defendant | Caption NJ Puppy Store t/a Wayne Puppies v. Township of Teaneck, et al. | | | |
| Case Type Number (See page 3 for listing) <u>609</u> | | | | |
| Are sexual abuse claims alleged? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | | |
| Does this case involve claims related to COVID-19? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | | |
| Is this a professional malpractice case? If "Yes," see N.J.S.A. 2A:53A-27 and applicable case law regarding your obligation to file an affidavit of merit. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | | |
| Related Cases Pending? If "Yes," list docket numbers | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | | |
| Do you anticipate adding any parties (arising out of same transaction or occurrence)? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | | |
| Name of defendant's primary insurance company (if known) | <input type="checkbox"/> None | <input checked="" type="checkbox"/> Unknown | | |

The Information Provided on This Form Cannot be Introduced into Evidence.

Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation

Do parties have a current, past or recurrent relationship? Yes No

If "Yes," is that relationship:

- Employer/Employee Friend/Neighbor Familial Business
 Other (explain) _____

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

If yes, please identify the requested accommodation:

Will an interpreter be needed? Yes 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 Rule 1:38-7(b).

Attorney/Self-Represented Litigant 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 page 1.)

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 Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (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/Isotretinoin
- 281 Bristol-Myers Squibb Environmental
- 282 Fosamax
- 285 Stryker Trident Hip Implants
- 291 Pelvic Mesh/Gynecare
- 292 Pelvic Mesh/Bard
- 293 DePuy ASR Hip Implant Litigation
- 296 Stryker Rejuvenate/ABG II Modular Hip Stem Components
- 299 Olmesartan Medoxomil Medications/Benicar
- 300 Talc-Based Body Powders
- 601 Asbestos
- 624 Stryker LFIT CoCr V40 Femoral Heads
- 625 Firefighter Hearing Loss Litigation
- 626 Abilify
- 627 Physiomesh Flexible Composite Mesh
- 628 Taxotere/Docetaxel
- 629 Zostavax
- 630 Proceed Mesh/Patch
- 631 Proton-Pump Inhibitors
- 632 HealthPlus Surgery Center
- 633 Prolene Hernia System Mesh
- 634 Allergan Biocell Textured Breast Implants
- 635 Tassigna
- 636 Strattice Hernia Mesh
- 637 Singulair
- 638 Elmiron

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

Please check off each applicable category

- Putative Class Action** **Title 59** **Consumer Fraud**

Civil Case Information Statement

Case Details: BERGEN | Civil Part Docket# L-001240-23

Case Caption: NJ PUPPY STORE-WAYNE PUPPIES VS
TOWNSHIP OF TEA

Case Initiation Date: 03/06/2023

Attorney Name: JOHN D COYLE

Firm Name: COYLE & MORRIS LLP

Address: 201 LITTLETON RD STE 210

MORRIS PLAINS NJ 07950

Phone: 9733700592

Name of Party: DEFENDANT : GOLDBERG, HILARY

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: DEFAMATION

Document Type: Answer 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

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: NJ PUPPY STORE-WAYNEPUPPIES? 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? NO

If yes, is that relationship:

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)*

06/05/2023

Dated

/s/ JOHN D COYLE

Signed