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June 27, 2011

Via UPS Delivery

Clerk of the Court
Civil Processing, Law Division
Bergen County Justice Center
10 Main Street, RM 115
Hackensack, NJ 07601-7699

Re: Dolores Krug v. Focus Receivables Management, Inc.
Docket No.: BER-L-4337-11
Our Client: Defendant, Focus Receivables Management, Inc.

Dear Sir or Madam:

Enclosed herewith please find an original and one copy of: (1) Answer To Class Action Complaint with Affirmative Defenses, Notices and Certifications on behalf of Defendant, CMRE Financial Services, Inc., with Proof of Filing/Service and (2) Defendant's Case Information Statement ("CIS").

Kindly file the original of each and return a file-stamped copy of each to our office in the enclosed self-addressed, stamped envelope. Please apply any filing fees to our Superior Court account no. 0010500.

Very truly yours,



VIRGINIA A. PALLOTTO

VAP/lb/859748.w

Encs. as stated

cc: Via E-mail and First Class Mail (w/ enc.):
Philip D. Stern, Esq.
Inna Ryu, Esq.

BUDD LARNER, P.C.
150 John F. Kennedy Parkway, CN 1000
Short Hills, NJ 07078-2703
(973) 379-4800
Attorneys for Defendant,
FOCUS RECEIVABLES MANAGEMENT, LLC

DOLORES KRUG an individual;
BRUCE HUFFMAN, an individual;
DONALD MARSO, an individual;
JONATHAN SUPPLER, an individual;
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

FOCUS RECEIVABLES
MANAGEMENT, LLC.,
a Georgia, Limited Liability Company,

Defendant.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY
DOCKET NO.: BER-L-4337-11**

Civil Action

**DEFENDANT, FOCUS
RECEIVABLES MANAGEMENT,
LLC'S ANSWER TO THE CLASS
ACTION COMPLAINT WITH
AFFIRMATIVE
DEFENSES, NOTICE,
CERTIFICATION AND PROOF OF
FILING/MAILING**

Defendant, Focus Receivables Management, LLC ("Focus Receivables" or "defendant"),
by way of Answer to the Class Action Complaint filed by the plaintiffs, states as follows:

I. PARTIES

1. It is admitted that plaintiff, Dolores Krug ("Krug"), is a natural person.
2. Focus Receivables is without sufficient information to form a belief as to the allegations contained in paragraph 2 of the Class Action Complaint as to plaintiff Krug's citizenship and residency, and, as such, leaves plaintiffs to their proofs.
3. It is admitted that plaintiff Bruce Hoffman ("Hoffman") is a natural person.

4. Focus Receivables is without sufficient information to form a belief as to the allegations contained in paragraph 4 of the Class Action Complaint as to plaintiff Hoffman's citizenship and residency, and, as such, leaves plaintiffs to their proofs.

5. It is admitted that plaintiff Donald Marso ("Marso") is a natural person.

6. Focus Receivables is without sufficient information to form a belief as to the allegations contained in paragraph 6 of the Class Action Complaint as to plaintiff Marso's citizenship and residency, and, as such, leaves the plaintiffs to their proofs.

7. It is admitted that plaintiff Jonathan Supler ("Supler") is a natural person.

8. Focus Receivables is without sufficient information to form a belief as to the allegations contained in paragraph 8 of the Class Action Complaint as to plaintiff Supler's citizenship and residency, and, as such, leaves the plaintiffs to their proofs.

9. Admitted.

II. PRIOR ACTION AND VENUE

10. Admitted.

11. It is admitted that plaintiffs consent to venue in Bergen County. Defendant is not challenging venue in Bergen County, New Jersey.

III. PRELIMINARY STATEMENT

12. Denied. The allegations contained in paragraph 12 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

13. (a)-(c). Denied. The allegations contained in paragraph 13, including all sub-parts (a) through (c) of the Class Action Complaint contain conclusions of law to which no responsive

pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

14. Denied. The allegations contained in paragraph 14 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

15. Denied. The allegations contained in paragraph 15 of the Class Action Complaint as to contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

16. Denied. The allegations contained in paragraph 16 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

17. Denied. The allegations contained in paragraph 17 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

18. Denied. The allegations contained in paragraph 18 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

IV. FACTS CONCERNING KRUG

19. Admitted.

20. Denied. The allegations contained in paragraph 20 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

21. Admitted.

22. Denied. The allegations contained in paragraph 22 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

23. Denied. The allegations contained in paragraph 23 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

24. Admitted.

25. Admitted in part; denied in part. It is admitted only that the defendant placed pre-recorded telephone messages to plaintiff Krug on some, but not all, of the dates listed. It is further noted that any alleged phone messages with dates of June 6, 12, 18, 21, 30, 2008, or which were filed over one-year prior to the filing of the Complaint are barred by the one-year statute of limitations contained in the Federal Debt Collection Practices Act ("FDCPA"). The defendant is without sufficient information as to the remaining allegations in paragraph 25 and, as such, they are also denied.

26. Denied. The allegations contained in paragraph 25 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required.

V. FACTS CONCERNING HUFFMAN

27. Admitted.

28. Denied. The allegations contained in paragraph 28 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

29. Admitted.

30. Denied. The allegations contained in paragraph 30 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

31. Denied. The allegations contained in paragraph 31 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

32. Admitted.

33. Admitted in part, Denied in part. It is admitted only that defendant placed messages on plaintiff's telephone answering machine, however, the defendant is without sufficient information to form a belief as to the remaining allegations as to the content as plaintiff does not list the dates of the alleged messages, and, as such, the remaining allegations contained in paragraph 33 of the Class Action Complaint are denied.

34. Admitted in part, Denied in part. It is admitted only that defendant placed messages on plaintiff's telephone answering machine, however, the defendant is without sufficient information to form a belief as to the content and dates, and, as such, the remaining allegations contained in paragraph 34 of the Class Action Complaint are denied.

35. Denied. The allegations contained in paragraph 35 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required.

VI. FACTS CONCERNING MARSO

36. Admitted.

37. Denied. The allegations contained in paragraph 37 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

38. Admitted.

39. Denied. The allegations contained in paragraph 39 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

40. Denied. The allegations contained in paragraph 40 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

41. Admitted.

42. Admitted in part; denied in part. It is admitted only that defendant left messages on plaintiff's answering machine on some dates. The defendant is without sufficient information to form a belief as to the remaining allegations and the same are denied.

43. Admitted in part; denied in part. It is admitted only that defendant left a message on plaintiff's answering machine. The defendant is without sufficient information to form a belief as to the remaining allegations and the same are denied.

44. Admitted in part; denied in part. It is admitted only that defendant left a message on plaintiff's answering machine. The defendant is without sufficient information to form a belief as to the remaining allegations and the same are denied.

VII. FACTS CONCERNING SUPLER

45. Admitted.

46. Denied. The allegations contained in paragraph 46 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

47. Admitted.

48. Denied. The allegations contained in paragraph 48 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

49. Denied. The allegations contained in paragraph 49 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

50. Admitted.

51. Denied. The allegations contained in paragraph 51 of the Class Action Complaint are denied.

52. Denied. The allegations contained in paragraph 52 of the Class Action Complaint are denied.

53. Denied. The allegations contained in paragraph 53 of the Class Action Complaint are denied.

54. Denied. The allegations contained in paragraph 54 of the Class Action Complaint are denied.

VIII. FACTS COMMON TO ALL PLAINTIFFS

55. Denied. The allegations contained in paragraph 55 state conclusions of law to which no responsive pleading is required.

56. Denied. The allegations contained in paragraph 56 state conclusions of law to which no responsive pleading is required.

57. Admitted in part, denied in part. It is admitted only that Focus Receivables placed some telephone messages to some, but not all, of the plaintiffs and that some of those messages

were within one year of the filing of the Complaint and others were not as more fully detailed in the responses set forth above which are incorporated herein by reference.

58. Denied. The allegations contained in paragraph 58 state conclusions of law to which no responsive pleading is required.

59. Denied. The allegations contained in paragraph 59 state conclusions of law to which no responsive pleading is required.

60. Denied. The allegations contained in paragraph 60 state conclusions of law to which no responsive pleading is required. To the extent that this contains allegations of fact, the same are denied.

61. Denied. The allegations contained in paragraph 61 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied as stated as set forth more fully above in responses to specific plaintiffs.

62. Denied. The allegations contained in paragraph 62 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied as stated as set forth more fully above in responses to specific plaintiffs.

63. Denied. The allegations contained in paragraph 63 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied as stated as set forth more fully above in responses to specific plaintiffs.

64. Denied. The allegations contained in paragraph 64 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required.

65. Denied. The allegations contained in paragraph 65 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required.

IX. POLICIES AND PRACTICES COMPLAINED OF

66. (a)-(c). Denied. The allegations contained in paragraph 66 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required.

67. Denied. The allegations contained in paragraph 67 of the Class Action Complaint contain conclusions of law to which no responsive pleading is required.

X. CLASS ALLEGATIONS

68. It is admitted that plaintiffs have filed this as a class action, it is denied that class treatment or class certification is appropriate or proper here.

69. Denied. The allegations contained in paragraph 69 state conclusions of law to which no response is required.

70. Denied. The allegations contained in paragraph 70 state conclusions of law to which no response is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

71. Denied. The allegations contained in paragraph 71 state conclusions of law to which no response is required.

72. Denied. The allegations contained in paragraph 72 state conclusions of law to which no response is required.

73. Denied. The allegations contained in paragraph 73 state conclusions of law to which no response is required.

74. Denied. The allegations contained in paragraph 74 state conclusions of law to which no response is required.

75. Denied. The allegations contained in paragraph 75 state conclusions of law to which no response is required.

76. Denied. The allegations contained in paragraph 76 state conclusions of law to which no response is required.

77. Denied. The allegations contained in paragraph 77 state conclusions of law to which no response is required.

78. Denied. The allegations contained in paragraph 78 state conclusions of law to which no response is required. To the extent that the allegations may be construed to include allegations of fact, the allegations are denied.

79. (a)-(e). Denied. The allegations contained in paragraph 79 (a)-(e) state conclusions of law to which no response is required.

[Note: numbers 80-83 are skipped in the Class Action Complaint]

84. Denied. The allegations contained in paragraph 84 state conclusions of law to which no response is required.

85. Denied. The allegations contained in paragraph 85 state conclusions of law to which no response is required.

[Note: number 86 is skipped in the Class Action Complaint]

XI. CAUSE OF ACTION

87. Defendant incorporates its responses to the preceding paragraphs as fully as thought set forth herein.

88. (a)-(c). Denied. The allegations contained in paragraph 88 (a)-(c) state conclusions of law to which no response is required.

XII. PRAYER FOR RELIEF

89. (a)-(e). The allegations contained in paragraph 89 (a)-(e) state conclusions of law and requests to which no response is required.

WHEREFORE, the defendant, Focus Receivables Management, LLC, demands judgment in its favor and against the plaintiffs, both individually and on behalf of others similarly situated, on all counts of the Class Action Complaint, together with attorneys' fees and costs of suit and such other relief as the Court deems appropriate.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Class Action Complaint fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiffs have not alleged any facts supporting any claim that they sustained any actual damages and, in fact, plaintiffs sustained no actual damages and statutory damages are not warranted here given the alleged technical violations.

THIRD AFFIRMATIVE DEFENSE

The matter is inappropriate for class action treatment or certification under New Jersey Court Rule 4:32-1 and Rule 4:32-2 and Defendant reserves the right to seek attorneys' fees and costs should class certification be denied.

FOURTH AFFIRMATIVE DEFENSE

The plaintiffs' claims are or may be barred by the applicable statutes of limitations to the extent that any alleged actions or inactions occurred over one year prior to the filing of the complaint.

FIFTH AFFIRMATIVE DEFENSE

Defendant maintains that this matter is improper for class certification under New Jersey Court Rule 4:32-1 and Rule 4:32-2 and the law, including but not limited to the following, the alleged number of potential class members, the likelihood of no recovery or *de minimus* recovery for any class members, the difficulty with administering a class of such size especially given the cap on damages in the FDCPA, and the lack of superiority of proceeding as a class action, and the lack of typicality and predominance.

SIXTH AFFIRMATIVE DEFENSE

If any technical violation of the FDCPA occurred, which is denied by Defendant, the Defendant acted in good faith as there was, and remains, a split of authority in the courts, as well as between the FDCPA and certain state laws, as to what information can be left on telephone answering machines or messages without potentially disclosing information to third-parties, and this mitigates against any recovery or a *de minimis* recovery, if any, for the individual plaintiffs and/or the class.

SEVENTH AFFIRMATIVE DEFENSE

To the extent that some or all of the debts for the plaintiffs are not “consumer” debts, the FDCPA is inapplicable and those plaintiffs are unsuitable to act as class representatives.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs are not suitable to be class representatives as they have filed other class actions for their own profit. In addition, their claims are also not typical or representative of other potential class members.

NINTH AFFIRMATIVE DEFENSE

Any alleged class action damages may not exceed the statutory cap for class actions set forth in the FDCPA which is the lesser of \$500,000 or 1% of the net worth of a defendant. It is further alleged that due to the anticipated size of the proposed class, that any class action in this matter is unlawful under the FDCPA since the anticipated costs and expenses of class notice and administration would defeat the cap on class damages.

TENTH AFFIRMATIVE DEFENSE

Plaintiffs are not entitled to declaratory relief as requested under the FDCPA.

ELEVENTH AFFIRMATIVE DEFENSE

The Class Action Complaint does not describe plaintiffs' claims with sufficient particularity to enable defendant to determine what additional defenses it may have. Therefore, defendant reserves the right to assert additional defenses that may be pertinent once the precise nature of plaintiffs' claims is ascertained through discovery. The absence or omission of any separate defense that defendant may seek to raise but has not done so to date is the result of plaintiffs' failure to plead such necessary facts and is not intended to constitute a waiver of such defense.

WHEREFORE, the defendant, Focus Receivables Management, LLC, demands judgment in its favor and against the plaintiffs, both individually and on behalf of others similarly situated, on all counts of the Class Action Complaint, together with attorneys' fees and costs of suit and such other relief as the Court deems appropriate.

BUDD LARNER, P. C.
Attorneys for Defendant,
Focus Receivables Management, LLC

By: 

Virginia A. Pallotto

Dated: June 27, 2011

CERTIFICATIONS

Pursuant to Rule 4:5-1(b)(2), this matter is not the subject of any other action pending in any court or of any pending arbitration proceedings and I know of no other parties that should be joined to this case. However, as set forth in the Class Action Complaint, the same parties had been involved in an identical case in the United States District Court for the District of New Jersey, Civil Action No. 09-cv-04310-JEI-AMD, which was dismissed without prejudice via stipulation.

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 compliance with Rule 1:38-7(b).

NOTICE OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Virginia A. Pallotto, Esq., is hereby designated as trial counsel for the defendant, Focus Receivables Management, LLC, in the above matter.

PROOF OF FILING/MAILING

I certify that I caused the original of this Answer to be filed with the Court via United Parcel

Service, next day delivery, on this date, and also on this date served a copy of this Answer upon all counsel of record via e-mail and First Class Mail, postage pre-paid.

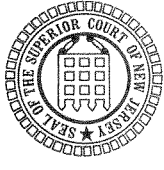


BUDD LARNER, P. C.
Attorneys for Defendant,
Focus Receivables Management, LLC

By: 

Virginia A. Pallotto

Dated: June 27, 2011
00859686.doc

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		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 Virginia A. Pallotto		TELEPHONE NUMBER (973) 315-4450	COUNTY OF VENUE Bergen	
FIRM NAME (if applicable) Budd Lerner, P.C.				DOCKET NUMBER (when available) BER-L-4337-11
OFFICE ADDRESS 150 John F. Kennedy Parkway, 3rd Floor Short Hills, NJ 07078-2703				DOCUMENT TYPE Answer to Class Action Complaint
				JURY DEMAND <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
NAME OF PARTY (e.g., John Doe, Plaintiff) Defendant, Focus Receivables Management, LLC		CAPTION Dolores Krug, et al. v. Focus Receivables Management, LLC a Georgia, Limited Liability Company		
CASE TYPE NUMBER (See reverse side for listing) 999		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) Executive Risk Indemnity, Inc. <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input checked="" 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 Individual case management needed for putative class action, case had previously been in state court, need 150 days to complete proposed class settlement.				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACC OMMODATION		
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 Rule 1:38-7(b).				
ATTORNEY SIGNATURE:  6/27/2011				



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
- 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
- 603 AUTO NEGLIGENCE - PERSONAL INJURY
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 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

Centrally Managed Litigation (Track IV)

- 280 Zelnorm
- 285 Stryker Trident Hip Implants
- 288 Prudential Tort Litigation

Mass Tort (Track IV)

- | | |
|---------------------------------------|--|
| 248 CIBA GEIGY | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 282 FOSAMAX |
| 271 ACCUTANE | 283 DIGITEK |
| 272 BEXTRA/CELEBREX | 284 NUVARING |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 286 LEVAQUIN |
| 275 ORTHO EVRA | 287 YAZ/YASMIN/OCELLA |
| 277 MAHWAH TOXIC DUMP SITE | 601 ASBESTOS |
| 278 ZOMETHA/AREIDIA | 619 VIOXX |
| 279 GADOLINIUM | |

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

Verbal Threshold

Putative Class Action

Title 59