

Ravi Sattiraju, Esq. (Attorney Id. No. 035251998)
SATTIRAJU & THARNEY, LLP
50 Millstone Road, Building 300, Suite 202
East Windsor, New Jersey 08520
(609) 469-2110
Attorneys for Plaintiff,
Irene Colao

IRENE COLAO,

Plaintiff,

v.

NORTH ARLINGTON PUBLIC LIBRARY;
JOHN/JANE DOES (these names being fictitious
as their present identities are unknown); ABC
CORPORATIONS (these names being fictitious
as their present identities are unknown),

Defendants.

:
: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: MONMOUTH COUNTY
: DOCKET NO. MON-L-000891-23

:
: CIVIL ACTION

:
: **SUMMONS**

From The State of New Jersey To The Defendant Named Above:

North Arlington Public Library

The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and Proof of Service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (A directory of the addresses of each Deputy Clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/pro_se/10153_deptyclerklawref.pdf.) If the Complaint is one in foreclosure, then you must file your written Answer or Motion and Proof of Service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, New Jersey 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to Plaintiff's attorney whose name and address appears above, or to Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with a fee of \$175.00 and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a Judgment against you for the relief Plaintiff demands, plus interest and costs of suit. If Judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the Judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Clerk of the Superior Court

s/ Michelle M. Smith

Michelle M. Smith

DATED: March 23, 2023

Name of Defendant to Be Served: North Arlington Public Library

Address of Defendant to Be Served: 210 Ridge Road, North Arlington, New Jersey 07031

COUNTY LAWYER REFERRAL/LEGAL SERVICES CONTACT INFORMATION

<p>New Jersey Bar Association Lawyer Referral Service (732)249-5000 Legal Services of New Jersey, Inc. (908)572-9100</p>	<p><u>Gloucester County</u> Gloucester County Bar Association Lawyer Referral Service (856)848-44071 *Regional Legal Services (856)848-5360</p>	<p><u>Passaic County</u> Passaic County Bar Association Lawyer Referral Service (973)278-9223 Passaic County Legal Aid (973)523-2900</p>
<p><u>Atlantic County</u> Atlantic County Bar Association Lawyer Referral Service (609)345-3444 Cape-Atlantic Legal Services (609)348-4200</p>	<p><u>Hudson County</u> Hudson County Bar Association Lawyer Referral Service (201)798-2727 Hudson County Legal Services (201)792-6363</p>	<p><u>Salem County</u> Salem County Bar Association Lawyer Referral Service (856)935-5629 *Regional Legal Services (856)496-4570</p>
<p><u>Bergen County</u> Bergen County Bar Association Lawyer Referral Service (201)488-0044 Bergen County Legal Services (201)487-2166</p>	<p><u>Hunterdon County</u> Hunterdon County Bar Association Lawyer Referral Service (908)200-7822 Hunterdon County Legal Services (908)782-7979</p>	<p><u>Somerset County</u> Somerset County Bar Association Lawyer Referral Service (908)685-2323 Somerset-Sussex Legal Services (908)231-0840</p>
<p><u>Burlington County</u> Burlington County Bar Association Lawyer Referral Service (609)261-4862 *Regional Legal Services (609)261-1088</p>	<p><u>Mercer County</u> Mercer County Bar Association Lawyer Referral Service (609)585-6200 Legal Aid Society-Mercer County (609)695-6249</p>	<p><u>Sussex County</u> Sussex County Bar Association Lawyer Referral Service (973)267-5882 Somerset-Sussex Legal Services (973-383-7400</p>
<p><u>Camden County</u> Camden County Bar Association Lawyer Referral Service (856)482-0618 *Regional Legal Services (856)964-2010</p>	<p><u>Middlesex County</u> Middlesex County Bar Association Lawyer Referral Service (732)828-0053 Middlesex County Legal Services (732)828-3433</p>	<p><u>Union County</u> Union County Bar Association Lawyer Referral Service (908)353-4715 Union County Legal Services (908)354-4340</p>
<p><u>Cape May County</u> Cape May County Bar Association Lawyer Referral Service (609)463-0313 Cape-Atlantic Legal Services (609)465-3001</p>	<p><u>Monmouth County</u> Monmouth County Bar Association Lawyer Referral Service (732)431-5544 Ocean-Monmouth Legal Services (732)414-6750</p>	<p><u>Warren County</u> Warren County Bar Association Lawyer Referral Service (908)387-1835 Warren County Legal Services (908)475-2010</p>
<p><u>Cumberland County</u> Cumberland County Bar Assoc. Lawyer Referral Service (856)696-5550 Legal Aid Society (856)691-0494</p>	<p><u>Morris County</u> Morris County Bar Association Lawyer Referral Service (973)267-5882 Legal Aid Society of Morris (973)285-6911</p>	
<p><u>Essex County</u> Essex County Bar Association Lawyer Referral Service (973)622-6204 Essex County Legal Aid Assoc. (973)622-0063</p>	<p><u>Ocean County</u> Ocean County Bar Association Lawyer Referral Service (732)431-5544 Ocean-Monmouth Legal Services (732)608-7794</p>	<p>* Camden Regional Legal Services, Inc. serves Burlington, Cumberland, Gloucester and Salem Counties.</p>

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Attorneys for Plaintiff Irene Colao

IRENE COLAO,

Plaintiff,

v.

NORTH ARLINGTON PUBLIC LIBRARY;
JOHN/JANE DOES (these names being
fictitious as their present identities are
unknown); ABC CORPORATIONS (these
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identities are unknown),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY
DOCKET NO.

CIVIL ACTION

**COMPLAINT AND JURY TRIAL
DEMAND**

Plaintiff, Irene Colao (hereinafter "Plaintiff" or "Colao"), by way of Complaint against Defendants, North Arlington Public Library; John/Jane Does (these names being fictitious as their present identities are unknown); and ABC Corporations (these names being fictitious as their present identities are unknown), alleges as follows:

THE PARTIES & VENUE

1. Plaintiff resides in the City of Manalapan, Monmouth County, in the State of New Jersey.
2. Defendant, North Arlington Public Library ("NAPL" or the "Defendant"), a New Jersey business entity with its principal business address being 210 Ridge Road, North Arlington, New Jersey 07031, had Plaintiff in its employ during the relevant time periods herein.

3. NAPL was at all relevant times herein an “employer” of Plaintiff for purposes of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. (the “LAD”).

4. Defendants ABC CORPORATIONS and/or JOHN/JANE DOES are currently unknown entities and/or natural persons, designated by fictitious names herein, who may also be liable to Plaintiff under the LAD.

5. Venue is proper in Monmouth County pursuant to R. 4:3-2(b) because Plaintiff resides therein.

SPECIFIC ALLEGATIONS

6. Plaintiff was employed at NAPL since January 2017 at the Circulation Desk, with a 9 (nine) month gap from around May 2021 through January 2022.

7. Plaintiff was a hard-working dedicated employee who ran numerous successful programs at NAPL.

8. Over the course of Plaintiff’s entire employment at NAPL, the Director of NAPL, Leo Bellino, subjected Plaintiff to an ongoing campaign of harassment, discrimination and hostile work environment on a near daily basis in violation of the LAD.

9. When Plaintiff mentioned she was having her pastor over for Thanksgiving, Mr. Bellino mocked her religion and commented she was having “Jesus Christ” coming over for dinner.

10. Plaintiff’s son married a female of Indian descent and Mr. Bellino commented that Plaintiff’s grandchildren will have shaved heads and worship a monkey God.

11. When Plaintiff asked why she was docked time when she was ill with Covid-19 when others were not, Mr. Bellino said she is “full of shit.”

12. Mr. Bellino made racial comments about the patrons who would come into the library, including referring to the African American patrons by the N-word, and comment that because he (Mr. Bellino) is gay, no one would believe he is racist.

13. Mr. Bellino would make sexual comments about Plaintiff's daughter to other NAPL employees stating that Plaintiff's daughter is "fucking everyone."

14. Regarding a female employee who has cats, Mr. Bellino stated this employee probably puts cat food between her legs and calls out "here, kitty."

15. Joseph Bellino is Mr. Bellino's father and often spent time at NAPL.

16. Mr. Bellino allowed, and in fact encouraged, his father, Joseph Bellino to make inappropriate and demeaning comments towards Ms. Colao and other women at NAPL.

17. Ms. Colao told Mr. Bellino that she felt his father's comment was unacceptable and that Joseph Bellino needed to apologize. Mr. Bellino's response was not only that she would not get an apology, but she is a 'fat slob.'

18. Mr. Bellino's discriminatory comments were more intimidating and upsetting because he has a violent temper, which is easily triggered.

19. The president of the library board, Ben Inzinna, would also make offensive comments in the library.

20. Mr. Inzinna would make sexually explicit comments, that included, but were not limited to saying he had a rod put in his penis so he could always have sex.

21. Mr. Inzinna also touted that he wanted to cheat on, or even kill, his wife.

22. Mr. Inzinna referred to the women working in the library as 'old hens' and suggested to one of the older employees that she retire.

23. The constant profanity and the degrading, demeaning, and discriminatory comments were too much for Ms. Colao to bear and she was forced to leave NAPL in September 2022.

24. Ms. Colao was constructively discharged because she would not have left but for the hostile work environment to which she was subjected.

COUNT ONE

(VIOLATION OF THE LAW AGAINST DISCRIMINATION)

25. Plaintiff repeats and reiterates each of the above allegations of the Complaint as though fully set forth herein.

26. Defendants' actions against Plaintiff violate the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. (the "LAD").

27. The Defendants' conduct in violating the LAD was especially egregious, malicious and/or engaged in with willful disregard of Plaintiff's rights and committed by members of the Defendants' upper management.

28. As a result of Defendants' unlawful conduct, Plaintiff has endured significant damages including, but not limited to, physical and bodily injuries, severe emotional distress, humiliation, embarrassment, personal hardship, career and social disruption, psychological and emotional harm, economic losses, and other such damages.

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in her favor and against Defendants, together with (i) all legally available damages to be determined at trial, with interest; (ii) punitive damages; (iii) pre-judgment and post-judgment interest at the highest rates allowed by law; (iv) attorneys' fees, costs and expenses with appropriate enhancement; and (v) all other legally permissible relief that the Court deems appropriate and just.

DEMAND TO PRESERVE EVIDENCE

DEMAND IS HEREBY MADE that all Defendants preserve all physical and electronic information pertaining or relating in any way to: (a) Plaintiff's employment; (b) her claims as alleged and asserted in this Complaint; (c) any and all defenses thereto; and (d) pertaining or relating to any electronic data storage, digital images, computer images, cache memory, searchable data, emails, spreadsheets, employment files, memos, text messages and any and all online social or work related websites, entries on social networking sites (including, but not limited to, Facebook, Twitter, Myspace, LinkedIn, etc.) and any other information and/or data and/or things and/or documents which may pertain to any claim or defense concerning this Complaint. Failure to do so may result in separate claims for spoliation of evidence and/or for appropriate adverse inferences.

DEMAND FOR JURY TRIAL

Pursuant to Rule 4:35-1, Plaintiff hereby demands a trial by jury as to all issues so triable.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:5-1(c), Ravi Sattiraju, Esq. is hereby designated as trial counsel for Plaintiff.

CERTIFICATION PURSUANT TO R. 4:5-1(b)(2)

I hereby certify, pursuant to Rule 4:5-1, that the matter in controversy herein is the subject of no other pending legal proceeding or arbitration nor is any other legal proceeding contemplated to the best of my information and belief. Further, I know of no other party who should be joined in this lawsuit other than the currently unidentified John/Jane Does and ABC Corporations.

CERTIFICATION PURSUANT TO R. 4:5-1(b)(3)

I hereby 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).

SATTIRAJU & THARNEY, LLP
Attorneys for Plaintiff,
Irene Colao

By: *s/ Ravi Sattiraju*
Ravi Sattiraju

Dated: March 22, 2023

Civil Case Information Statement

Case Details: MONMOUTH | Civil Part Docket# L-000891-23

Case Caption: COLAO IRENE VS NORTH ARLINGTON
PUBLIC LIBRAR

Case Initiation Date: 03/22/2023

Attorney Name: RAVI SATTIRAJU

Firm Name: SATTIRAJU & THARNEY, LLP

Address: 50 MILLSTONE RD BLDG 300, STE 202
EAST WINDSOR NJ 08520

Phone: 6094692110

Name of Party: PLAINTIFF : COLAO, IRENE

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

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

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

Are sexual abuse claims alleged by: IRENE COLAO? 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: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

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

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

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



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

03/22/2023

Dated

/s/ RAVI SATTIRAJU

Signed

MONMOUTH COUNTY
SUPERIOR COURT
PO BOX 1270
FREEHOLD

NJ 07728

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 358-8700
COURT HOURS 8:30 AM - 4:30 PM

DATE: MARCH 22, 2023
RE: COLAO IRENE VS NORTH ARLINGTON PUBL IC LIBRAR
DOCKET: MON L -000891 23

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON KATHLEEN A. SHEEDY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (732) 358-8700 EXT 87871.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: RAVI SATTIRAJU
SATTIRAJU & THARNEY, LLP
50 MILLSTONE RD
BLDG 300, STE 202
EAST WINDSOR NJ 08520

ECOURTS

