

Plaintiff, ESTATE OF COREY MICCIOLO, who at the time of his death was residing at 58 Oxford Court, Englishtown, New Jersey, a minor, deceased, by BREANNA MICCIOLO, Administratrix Ad Prosequendum and General Administratrix of the ESTATE OF COREY MICCIOLO, and BREANNA MICCIOLO, individually, by way of complaint say:

FIRST COUNT

1. At all times relevant hereto, Defendant State of New Jersey, Department of Children and Families, Division of Child Protection and Permanency (“DCPP”) was and is a state agency responsible for the care, custody, guardianship, safety, maintenance, well-being, and protection of children in New Jersey and/or within its care.

2. At all relevant times hereto, Defendants Alisson Cassone, Stacy Epps, Mark Waltonowski, and JANE DOE 1-10 (fictitious individuals), were agents, servants, and/or employees of Defendant the State of New Jersey, Department of Children and Families, Division of Child Protection and Permanency working as case workers, investigators, or were supervisors of other case workers and were responsible for the care, custody, maintenance, safety and supervision of the decedent, Corey Micciolo.

3. At all relevant times hereto, “Vinny N.” and/or RYAN ROE 1-100 (a fictitious person) was an agent, servant, and/or employee of Defendant the State of New Jersey, Department of Children and Families Office of Advocacy working as a case worker, investigator, representative, or supervisor and was responsible for the care, custody, maintenance, safety and supervision of the decedent, Corey Micciolo.

4. Defendant JANE DOE 1-100 (a fictitious person) is a fictitious designation for those individual investigators, case workers, supervisors, and/or agents, servants and/or employees of Defendant the State of New Jersey, Department of Children and Families, Division of Child