

 DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of R. 4:25-4, William H. Pandos, Esq., is hereby designated as trial counsel on behalf of the Plaintiffs.

 DEMAND FOR TRIAL BY JURY

Please take notice that Plaintiffs hereby demand a trial by jury as to all issues so triable.

RULE 4:5-1 CERTIFICATION

 I hereby certify pursuant to R. 4:5-1(b)(2) that this matter is not presently the subject of any other action pending in any court or of a pending arbitration proceeding. Further, no other  action or arbitration proceeding is being contemplated at this time. Also, to the best of my  knowledge, there are no other parties that should be joined in this action at this time.

RULE 1:38 CERTIFICATION

I certify that confidential personal identifiers, if any, have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future in accordance with the Rules of the Court.

LAVERY, SELVAGGI & COHEN, P.C.
Attorneys for Plaintiffs

By: /s/ William H. Pandos

William H. Pandos, Esq.

Dated: August 22, 2025

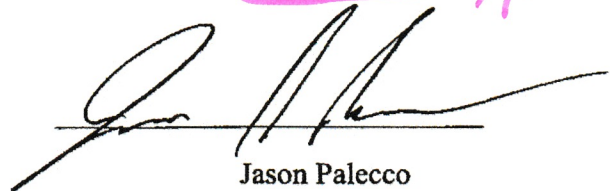
VERIFICATION

Jason Palecco, of full age, hereby verifies as follows:

1. I am an individually-named Plaintiff in this action as well as the General of Johnson GMC Cadillac, Inc., for all times relevant to the Verified Complaint.

2. I have read the Verified Complaint and am personally familiar with the contents thereof. The factual matters and statements set forth in said Verified Complaint are based upon my personal knowledge. I have relied upon my attorneys for those statements in the Complaint related to legal conclusions and/or statements of law.

I certify that the foregoing statements made by me are true. I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.


Jason Palecco

Dated: August 22, 2025