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30% SHAMY & LUKE, ESQS. 178 Livingston Avenue New Brunswick, New Jersey 08901 (201) 828-7700 Attorneys for Plaintiffs

JOSEPH V. LORE, ELEANOR LORE, JAMES DEITZ, MÓDESTA S. DEITZ KENNETH MCKENZIE, CAMERON J. HILLMANN, MILDRED L. HILLMANN and RATON HOLDING CO., ROBERT T. SEAMAN, SR., MARTAN J. SEAMAN, FELIX J. MC CABE and CAROL A. MC CABE, CATHERINE LOWENBURG, KAREN WARD, ARTHUR PONTRELLI AND SARAH PONTRELLI

PLAINTIFFS.

LONE PINE CORPORATION, A NEW JERSEY CORPORATION; ALL COUNTY ENVIRONMENTAL SERVICE CORP; ALL COUNTY WASTE: ALLENTOWN BORO: ALLIED CHEMICAL; ALL WASTE SERVICES, INC.; ALMO ANTI-POLLUTION SERVICES: AMERICAN CYANAMID: AMERICAN-HOECHST CORP.; ATLANTIC DISPOSAL SERVICE) INC.; ATLANTIC SANITATION SER VICE, INC.: ABC CORPORATION: A & B CESSPOOL; AIR PRODUCTS; EMMY ALLEN; ALL-IN-ONE SERVICES;) ALL PURPOSE; ALL STEEL MANUFAC-) TURING CO.; AMERICAN FLANGE; AM~) ERICAN INKS: AMERICAN STANDARD:) ARMITAGE: ARMSTRONG: ARROW GROUP:) ASHLAND CHEMICAL CO.; MACK BARNES: BFI OF SOUTH JERSEY INC;) BROCKWAY CLASS CO., INC.; J.T. BAKER: BASE WYANDOTTE: B.F. GOODRICH: BEL-RAY CO., INC.; BENJAMINE MOORE: BERMAR; BETH'S) LANDSCAPING: THOMAS M. BILLY: BILL GERTY EXCAVATING CO.: BIO-)

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

Civil Action



COMPLAINT AND DEMAND FOR JURY

NOMIC RESOURCES, INC.; LAWRENCE) L. BLAKE; C. BOIS; BORDON; WALTER BRAND; ALBERT S. BROWN; C.M. BROWN: BROWN PAVING CO.; BUILD N SAVE; BUILDERS BLOCK & SUPPLY CO., INC.; RICHARD J. BYRNE; CARTER-WALLACE, INC.; HERBERT G. CASE, JR.; CIBA-GEIGY CORP.; CHARLES J. KUPPER,) INC.: COCA COLA CO.: COLONIAL POULTRY FARMS: COLONIAL SEPTIC & CESSPOOL CLEANING: COLTS NECK) TOWNSHIP: CRANBURY TOWNSHIP: CAGNEY & BYKE; CAPITOL MAGNETICS; CARPENTER; GELLU-CRAFT: CENTRAL JERSEY SEPTIC TANK; CHEMCOAT; CHEMICAL LEHMAN;) CHESTERFIELD TOWNSHIP; ANDREW CHORNIEWY: CITY OF TRENTON: C &) J CONTRACTING CO.; COMET CHEMI-) CAL; CONGOLEUM/TRENTON; CONES-TOGA FUEL; CONTINENTAL CAN; CONVERTED, INC.; C&R EQUIPMENT;) C. SEEMS & SONS; C. SIMPKINS & SONS; CUSTOM CHEMICAL; DIAMOND SHAMROCK CORP; MARION DELLATA-COMA: PAT DELORENZO: JOSEPH R. DUBOIS: DEPINTO'S EXCAVATING CONTRACTORS: JOHN A. DITCH; DECORATIVE INDUSTRIES; DOCK EDWARDS JR., DAMON DOUGLAS; DRI) PRINT; DROST DISPOSAL; DUPONT; EAST WINDSOR TOWNSHIP; ECONOMY ENTERPRISES, INC.; ED MAHER; ENGLISHTOWN BOROUGH; EAST BRUNSWICK TOWNSHIP; MIKE EDWARDS; ALBERT ELIAS: DRUCKETT & LAIRD; ARLENE ELIAS ELIZABETH DISPOSAL, INC.; JOHN ELLINGTON; ROBERT A. ELLIS; ENGLISHTOWN AUCTION SALES; EWING TOWNSHIP; EXCELL CORP.; EXXON: FREEHOLD BOROUGH; PREEHOLD TOWNSHIP; FABRIC LEATHERS: FARMINGDALE BOROUGH: EVERETT FERWICK; FERWICK ENTER-) PRISES: THOMAS FERRARO: F. HOLLANDER & SON, INC.; JOHN W. FLEMER: FLEXIBAR: FLORENCE TOWNSHIP; FORSGATE SANITATION, INC.: FRANK C. GIBSON & SONS; FRANK'S AUTO REPAIR: HEMBERT

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FRAUB: FREEHOLD BOARD OF EDUCA-)
TION: FREEHOLD ELECTRIC CO.,
INC.: FREEHOLD BORO POLICE DE-
PARTMENT; FREEHOLD LUMBER CO..
INC.: FREEHOLD MUSIC CENTER:
FREEHOLD RACEWAY; FREEHOLD
REGIONAL HIGH SCHOOL; FREEHOLD
TOWNSHIP WATER CO.: FREEHOLD
TURKEY SWAMP; FROELICK BUILDING)
CONSTRUCTION CO.: GILBERT FREE-)
MAN; GARDEN STATE DISPOSAL SER-)
VICE, INC.; SIDNEY GELMAN;
GEORGE E. HALO & SONS; ANTHONY
M. GIAQUINTO; GILBERT CESSPOOL
SERVICE, INC.: EDWARD
GRABOWSKI; GRUMMAN AEROSPACE
CORP.: GAF CORPORATION: JOSEPH
GALE; GALE INDUSTRIAL SCRAP
METAL; GANES; GARDEN STATE AIR
CONDITIONING: ALLAN S. GARRET-
SON: GENERAL ANILONE & FILM:
GENERAL BEARING; GENERAL FOODS;)
GENERAL MOTORS; GENERAL ELECTRIC)
CO.; WILLIAM J. GERITY; FRANK
C. GIBSON, INC.; GILBERT SEPTIC)
TANK SERVICE; GLEVENTO; GORDON
& WILSON CO.; F GRABOWSKI:
ROBERT GRABOWSKI: GREGORY
PRESTON EXCAVATING CONTRACTORS;
OLAV GROMANN: GTE-SYLVANIA;
GUARDIAN, INC.; GUMINA
CONSTRUCTION: G. WHITFIELD
RICHARDS CO.; GEORGE E. HALO;
HENRY HELFRICH; HIGGINS DIS-
POSAL SERVICE: HIGHTSTOWN
BOROUGH: HOLMDEL TOWNSHIP; HALL
CONSTRUCTION CO.: HAMILTOWN
TOWNSHIP; PAUL R. HANCIN:
HARMON COLOR & CHEMICAL:
HARSHAW: HARGILL SUPPLY CO.,
INC.: HARRIS BROTHERS; HAULAWAY)
INC.: HECHT BROS..INC.: H.E.I.:
E.G. HELLER; HELMETTA BOROUGH;
CHARLES L. HENDRICKSON, JR.;
CHARLES L. HENDRICKSON, SR.;
HENDRICKSON EXCAVATING. INC.:
ALEXAMORE HEREMOMAK: HERMETZ:
HICHTSTOWN BORONGH; HIGHTSTOWN
CARTING: HIMSON DISPOSAL
SERVICE: ARTHUR E. HOOMBERG:
HOME BELL COMETRUCTION CO.:
HOM.LAND & MC CHRENEY; HOWELL
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SANITATION: HOWELL TOWNSHIP;
HUDSON IRON & METAL: WALTER C.
HURLEY: H. WHITE TRUCKING:
INTRA CITY WASTE MATERIALS, INC.
IBM; INDUSTRIAL COATING CO.;
INGERSOLL-RAND CO.; F. J.
TENTILE, INC., INLAND; INMONT;
INTERNATIONAL: JOSEPH W. IVINS;
IVINS DISPOSAL SERVICE: JOHN
HOLM & SONS; JACKSON TOWNSHIP;
J.D. CONSTRUCTION: J.A. JONES
CO., INC.: J&B ROOFING: ALBERT
JENKINS: JERSEY CENTRAL POWER &)
LIGHT CO.: JERSEY SHORE MEDICAL)
CENTER: JOSEPHSON: JO MAR
FENCE: JOSEPH OSTROSKI, JR.
EXCAVATING: J. R. S. LUMBER
SUPPLY CO., INC.; J. VINCE &
SONS: KEANSBURG BOROUGH: WILLIAM)
L. KAPLIN; WALTER KARLUCK; KEITH)
LACKEY LAWN SVC: THOMAS P. KIELY)
KINGSLEY SQUARE; KERNS FURNI-
TURE; KINGSTON; KINKER CHEMICAL;)
KOV ENTERPRISES: KING HEATING &)
COOLING: PAUL KOVALSKI; KUBIAK
ELECTRIC: LEDERLE LABORATORIES;)
LEVIT & SONS: LONG BRANCH
SEWERAGE: KEITH J. LACKEY: LAC
AMERICAN; MURRAY LAGORSKI:
EDWARD LAHAYE; RON LAKE;
LAWRENCE TOWNSHIP; I. LANDAU;
LERRIT, HENDERSON & CASEY:
JEROME LIGHTMAN: LIGHTMAN DRUG
CO.; LIVING SYSTEMS, INC.: LONG)
BRANCH TOWNSHIP: LOPATON CON-
STRUCTION: LOWER BUCKS COUNTY:
LUCKINS STEEL; M&A SALVAGE:
MANALAPAN CARTAGE SVC.; MANALA-)
PAN TOWNSHIP; MARLBORO TOWNSHIP; )
MARLEEN J. MOZER: MILLSTONE
TOWNSHIP: MINNESOTA MINING &
MFC, CO.: MEK; MEADOWBROOK
CARTAGE CO.: MONMOUTH SANITA-
TION SVC: MONROE TOWNSHIP:
MONROE TWF. MUNCIPAL UTILITIES
ANTH.: MAAS & WELDSTEIN: MARIAN)
B. MACAULAY; MANALAPAN CARTAGE;)
MANZO EXCAV. CO.; MARLAGRO
PSYCHIATRIC HOSPITAL: ROCKE
MARTIN: WILLIAM MARTIN: MARTIN
REALTY DEVEL., INC.; MATLACK;
MATTY IN AUTH MODY SHOP; MAZZA A)
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SONS; MAXWELL HOUSE; J. MATTHEWS; )
MCB CO.: SYLVESTER MC KELVEY;
J.F. MC GREEVEY; MC KELVEY FUR-)
NITURE COMPANY; MEADOWBROOK
CARTING CO.; M. EDWARDS LIGHT
TRUCKING CONTR.; HARRY W.MEGILL;)
THOMAS A. MEHOLIC; MIHN'S BOAT
YARD; MERCK PHARM.; MILLS CRANE;)
MIDEAST ALUMINUM; MILLHURST
MILLS, INC.; M & T CHEMICAL;
MOBILE CHEMICAL; MONMOUTH
BATTLEFIELD STATE PARK: MON-
MOUTH COUNTY BRIDGE DEPT .:
MONMOUTH COUNTY HIGHWAY DEPT.;
MONMOUTH COUNTY HISTORICAL
ASSOC.: MONMOUTH COUNTY
NATIONAL PARK: MONMOUTH COUNTY
SHADE TREE COMMISSION; MON-
FREEHOLD IND. PARK; MONMOUTH
MECHANICAL CORP.; MONMOUTH
MERCH. CO., INC.; MONMOUTH MUN.)
UTILITY: MONROE TWP.; MONROE
TWP. MUN. UTIL.; MONTGOMERY TWP;)
FRANK M. MUCCIO; J. MOUNT;
NATIONAL WASTE DISPOSAL, INC.;
NEPERA CHEM. CORP.; NESTLE CO.,)
INC.; SHERMAN NELSON: NEW EGYPT)
SALVAGE; NEW ENGLAND LAMINATES;)
CITY OF NEW BRUNSWICK: N.J. DEPT.)
HUMAN SVC.; N.J. DEPT. TRANSP.;)
N.J. INT'L MOVERS: N.J. TURN-
PIKE AUTH.; NL INDUSTRIES; NORTH)
BRUNSWICK TWP.; NWL TRANS-
FORMERS; OWENS CORNING; OWENS-
ILLINOIS CORP.: OCEAN TWP.
SEWER AUTHORITY; JOHN A.
OLBIS AMUND J. OLSEN:
OLSEN & HASSOLD, INC.; ONEIDA
PKG. CO.; ON-SITE CON. CO.;
ORRS MOTOR; OHIO GASUALTY INS.
CO.; JOSEPH OSTROSKI, JR.;
STOUT O'SULLIVAN: PINELAND
SEPTIC SVC.: JOHN J. PINTO:
PASSAIC COUNTY; PEN CHEMICAL;
PENNWALT CORP.: PENNYWEIGHT &
CO. STANLEY R. PERRIME: PETER
J. SAKER, INC., PFIZER: PLAINS-)
BORO TWP : PLANT FOOD: AL POM-
PONTO: POMPONTO TRUCKING &
EXCAV.; P. PINTO & BON: IDA
PRESTON: PRESTON EXCAV.:
PRIMCETON NURSERVIRS: PRIMCETON
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TWP.; THOMAS PROCTOR; PROVINCE-LINE CONST. INC.: PYROLCA; GERALD QUAGLIETTA: QUALITY ROOFING CO.; RCA; JOHN W. RICHARDSON, JR.; ROHM & HAAS CO.) ROOSEVELT BOROUGH: R&R; RANDOLPH) TOWNSHIP: RANCOCAS VALLEY REFUSE) DISPOSAL; RAYMOND C. RAYMOND; RAYMOND PRESTON, INC.; STUART REINER; REVLON; REFINED ONYX; RELIANCE UNIVERSAL: RECYCLING IND.; RHEEM: DONALD RIDDLE: RIDGE PRINTING; THOMAS D. RITZ;) R.J. POST CONS.; R.L. TRUCKING; CRESCENT ROSELLE; SEYMOUR ROSENFARB: HARRY W. ROSH: R.T.D. CARTING: RUSSELL REID CO.; SCIENTIFIC CHEM. PROCESSING; LEIF R. SIGMOND: SOLVENTS RE-COVERY SVC.; SOUTHERN MON. REG.) SEWERAGE; JOHN SAKER; P.S SAKER) SANO CARTING CO., INC., ROBERT W.) SELLERS: RICHARD SCHNABLE; SCHNABLE TIRE CO.: JOSEPH L. SESSOCK: SCHAEFFER: SCHENECTADY) CHEM.; DAVID C. SHADLE: DAVID C. SHAW: JOSEPH F. SHANNON: SEYMOUR SILVER: SILVER ENTER-PRISES: SILVERT'S FURNITURE: SILRA CHEM.; I. SHROTT; JOHN B.) SMITH; T. FRED SMITH: STEVEN J. SOBECHKO: SOLITE: SQUIBB: S&S DISPOSAL STEINBACH CO.: STAR EXPENSION; E.G. STELLER; ROBERT) STINSON: PAT K. STROMWASSER; SWAN PUMP & SUPPLY CO.; TAYLOR PUMPING SVC.: TOMS RIVER CHEM. CORP.: TWIN COUNTY DISPOSAL: LEONARD E. TAFT: GABRIELLE J. TASCIONE; TAYLOR MILLS: T.D. DE PONTE EXCAV.: TECH COATINGS; TENNECO: TENOX: THOMAS PROCTOR CO., VOORHEES J. THOMPSON; HAROLD R. TEST: THOMPSON DISPOSAL; TIDEWATER DISTRIBUTION: DENNIS TIMMERMAN:) JAMES J. TRUNCER: UPPER PREE-HOLD TWP.: UNION CARBIDE: FRANK) ULATOWSKI: VOGAL BEEWESTER; ROGER W. VOGEL: WARD BROS.INC.; WASTE DISPOSAL, INC., WATER 平日制料化1、60超易。 60。1、国报看里指核县

MONMOUTH UTIL: WEST WINDSOR TWP.; ALVIN H. WHITE: WINDSOR SEPTIC; WORTHINGTON BIOCHEMICAL; WALL TWP.; WALTER C. HURLEY CONST. CO.; WILLIAM F. WARD, SR.; WEST LONG BRANCH EQUIP.; WESTERN ELECTRIC CO.: WHITE TRUCKING; HANS J. WIESE; WILENTA BROS. CARTING: PETER B. WILENTA; ARTHUR O. WILSON; WINDSOR PUMPING: GILBERT WINSTEN: WOODRIDGE TWP.: FRANK L. WITMAN; WONDERICK; DAVID WRIGHT; W.T.E.; JOHN M. ZUCCARDELLI, III; ALEXANDER FRANCIS ZYDALLAS: JOHN DOE (a fictitious name, party intended) being unknown); JOHN ROE (a fictitious name, party intended) being unknown); XYZ CORP. (a fictitious name, party intended) being unknown).

DEFENDANTS.

Plaintiffs, each of whom are listed on Exhibit A attached hereto, complaining of the defendants, their agents, servants and employees, state the following:

FIRST COUNT

- 1. The Plaintiffs are individual residents of the State of New Jersey and/or New Jersey corporations or corporations authorized to transact business in the State of New Jersey.
- 2. At all times heretofore mentioned, the individual plaintiffs and corporate entities are part of a class with common interests in regard to the acts alleged against the Lone Pine Corporation, its agents, servants and employees. The said plaintiffs bring this action as members of a class who have sustained similar losses as a result of the negligence of the Lone Pine Corporation, its agents, servants and employees.

- 3. At all times heretofore mentioned, the Lone Pine Corporation conducted a landfill known as the Lone Pine Landfill located on 45 acres in the Borough of Freehold.
- 4. Said landfill was operated from a period some time in 1959 until its closure in December 1979.
- 5. During that period of time, the landfill received garbage, refuse and waste from various haulers, various generators and other various sources.
- 6. During the aforementioned time, the defendant corporation, its servants, agents and employees, carelessly and negligently received and disposed of hazardous and toxic wastes without adhering to the proper guidelines and standards; failed to follow State and Federal guidelines with regard to the receipt, monitoring and proper disposition of said toxic wastes brought to the landfill for disposition; permitted drums, barrels and containers of toxic and hazardous wastes to be deposited in said landfill without proper testing or monitoring of same.
- 7. As a result of the careless and negligent receipt and disposal of hazardous and toxic waste materials upon and buried within the landfill, the landfill area, the surrounding lands, the surrounding air, the underlying subsurfaces and the underlying aquifers have been and continue to be contaminated and polluted with hazardous and toxic substances by leakage, absorption and assimilation of those substances.
 - 8. As a result of the careless and negligent actions of

the defendant corporation, its agent, servants and employees, the toxic and hazardous substances have leaked, have been absorbed, have been transferred and have otherwise found their way into the surrounding areas, adjoining aquifers and the headwaters of the Manasquan River and all waters flowing therefrom, such that said waters were polluted and contaminated and continue to be so, and will continue to be polluted for a number of years.

- 9. The Lone Pine Landfill, its owners, agents, servants and employees, negligently and carelessly failed to take any remedial steps which would eliminate or reduce the hazard of pollution with regard to the surrounding areas and underlying aquifers.
- 10. From 1959, until its closure in December, 1979, numerous generators and haulers caused industrial and commercial wastes, solids, and other toxic to be negligently, improperly, and unlawfully transported to, and dumped in the Lone Pine Landfill, in contravention of existing State and Federal Regulations.
- 11. Said wastes and toxins were volitle, noxious poisonous, and were such that would contaminate the landfill surrounding land and aquifers beneath the landfill itself.
- 12. Defendants, and each of them, acted in a careless and negligent manner with regard to the generation of toxic and noxious substances and the transportation of same to the landfill.

- 13. The following defendants, characterized as generators processors and transporters, did negligently and carelessly generate, process and/or transport materials to the Lone Pine Landfill, thereby contributing to the pollution of the Landfill, surrounding waterways, to wit:
- (a) All County Environmental Service Corp. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (b) All County Waste is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (c) Allentown Borough is a Municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (d) Allied Chemical is a Corporation which is engaged in

the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (e) All Waste Services Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (f) Almo Anti-Pollution Services is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (g) American Cyanamid is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they

caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (h) American-Hoechst Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (i) Atlantic Disposal Services Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (j) Atlantic Sanitation Service Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste hadlers for removal and disposition

of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (k) ABC is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (1) A & B Cesspool is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (m) Air Products is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes; in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (n) Emmy Allen engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
 - (o) All-In-One-Services is a Corporation which is engaged

in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (p) All Purpose is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (q) All Steel Manufacturing Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (r) American Flange is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they

caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (s) American Inks is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (t) American Standard is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (u) Armitage is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic

substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (v) Armstrong is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (w) Arrow Group is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (x) Ashland Chemical Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be

classified as a generator.

- (y) Mack Barnes is an individual who engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (z) BFI of South Jersey Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (a-1) Brockway Class Co., Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (b-1) J. T. Baker engaged in the business of producing,

manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the atream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (c-1) BASF Wyandotte is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (d-1) B.F. Goodrich is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (e-1) Bel-Ray Co., Inc. in a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic aubatances which they caused to be placed into the stream of commerce by certain

waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

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- (f-1) Benjamin Moore is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (g-1) Berman is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (h-1) Beth's Landscaping is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste housers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine

Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (i-1) Thomas M. Billy engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (j-1) Bill Gerty Excavating Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (k-1) Bio-Nomic Resources Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (1-1) Lawrence L. Blake was an officer, servant, agent and employee of Hightstown Borough who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (m-1) C. Buis engaged in the business of producing, manufacturing, compounding and distributing inherently

dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (n-1) Bordon is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (o-1) Walter Brand is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (p-1) Albert S. Brown is engaged in the business of collecting and hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (q-1) C. M. Brown engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste baulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Fine

- Landfill. Said defendant will be classified as a generator.
- (r-1) Brown Paving Company is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (s-1) Build N Save is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (t-1) Builders Block & Supply Co., Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (u-1) Richard J. Byrne is an officer, servant, agent and employee of Walter C. Hurley Construction Co. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be

compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (z-1) Coca Cola Company is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (a-2) Colonial Poultry Farms is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (b-2) Colonial Septic & Cesspool Cleaning is a Corporation which is engaged in the business of producing, manufacturing; compounding and distributing inherently dangerous toxic substances which they caused to be placed into the atream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (c-2) Colts Neck Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (d-2) Cranbury Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (e-2) Cagney & Byke is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste hauters for removal and disposition of said toxic substances which ultimately were deposited, in contravention of

statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (f-2) Capitol Magnetics is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (g-2) Carpenter is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (h-2) Cellucraft is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (i-2) Central Jersey Septic Tank is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (j-2) Chemcoat is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (k-2) Chemical Lehman is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (1-2) Cheererfield Township to a municipality which is engaged in the business of producing, manufacturing.

compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (m-2) Andrew Chorniewy was an officer, servant, agent and employee of Industrial Coating Company who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (n-2) City of Trenton is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (o-2) C & J Contracting Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste baulers for removal and disposition

of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (p-2) Comet Chemical is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (q-2) Congoleum/Trenton is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (r-2) Consestoga Fuel is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be

classified as a generator.

(s-2) Continental Can is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

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- (t-2) Converted Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (u-2) C & R Equipment is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (v-2) C. Seems & Sons, Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a bauler.
- (w-2) C. Simpkins & Sons is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they

caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

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- (x-2) Custom Chemical is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (y-2) Diamond Shamrock Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (z-2) Marion Dellatacoma was an officer, servant, agent and employee of Garden State Disposal who knew that dangerous, bazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal

re: lations. Said defendant will be classified as a hauler and/or generator.

- (a-3) Pat DeLorenzo was an officer, servant, agent and employee of defendant Twin County Disposal who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (b-3) Joseph R. DuBois was an officer, servant, agent and employee of defendant Colonial Septic who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (c-3) DePinto's Excavating Contractors is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- employee of Steinback Company, who know that dangerous,

hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

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- (e-3) Decorative Industries is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (f-3) Dock Edwards Jr. Trucking is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (g-3) Damon Douglas engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(h-3) by i Frint is a Corporation which is engaged in the

business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (i-3) Drost Disposal is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (j-3) Dupont is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator,

- (1-3) Economy Enterprise Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (m-3) Ed Maher Septic is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (n-3) Englishtown Borough is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (o-3) East Brunswick Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said

defendant will be classified as a generator.

- (p-3) Mike Edwards is an officer, servant, agent and employee of Mike Edwards Trucking who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (q-3) Albert Elias is an officer, servant, agent and employee of Mike Edwards Trucking who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (r-3) Duckett & Laird is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (s-3) Arlene Elias is an officer, servent, agent and employee of Central Jersey Septic Tank who knew that dangerous, hazardous and toxic waste materials were being generated or

transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

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- (t-3) Elizabeth Disposal Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (u-3) John Ellington is an individual who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (v-3) Robert A. Ellis was an officer, servant, agent and employee of defendant Almo Anti-Pollution who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(v-3) Englishtown Auction Sales, Inc., is a Corporation

which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

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- (x-3) Ewing Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (y-3) Excell Corporation is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (z-3) Exxon is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they

caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

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- (a-4) Freehold Borough is a Municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (b-4) Freehold Township is a Municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (c-4) Fabric Leathers is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste baulers for removal and disposition of said toxic

substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (d-4) Farmingdale Borough is a Municipality which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (e-4) Everett Fenwick was an officer, servant, agent and employee of defendant Fenwick Enterprises, Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (f-4) Fenwick Enterprises, Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (g-4) Thomas Ferraro was an officer, servant, agent and employee of defendant Living Systems, Inc. who knew that dangerous, bazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being damped and disposed there in contravention of applicable

State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(h-4) F. Hollander & Son, Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(1-4) John W. Flemer was an officer, servant, agent and employee of defendant Princeton Nurseries who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(j-4) Flexibar is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(k-4) Florence Township is a municipality which is ansauged

in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

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(1-4) Forsgate Sanitation Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(m-4) Frank C. Gibson & Sons is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(n-4) Frank's Auto Repair is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said

defendant will be classified as a generator.

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(0-4) Herbert Fraub was an officer, servant, agent and employee of defendant Guardian, Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(p-4) Freehold Board of Education is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(q-4) Freehold Electric Co., Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(r-4) Freehold Boro Police Department is a Corporation which is engaged in the business of producing, manufacturing,

compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (s-4) Freehold Lumber Co., Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (t-4) Freehold Music Center is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Fine Landfill. Said defendant will be classified as a generator.
- (u-4) Freehold Raceway is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they coused to be placed into the stream of commerce by certain

waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(v-4) Freehold Regional High School is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(w-4) Freehold Township Water Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(x-4) Freehold Turkey Swamp is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by corrain waste hadders for removal and disposition of said texic substances which ultimotely were deposited, in

contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (y-4) Froelick Building Construction Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (z-4) Gilbert Freeman is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (a-5) Garden State Disposal Service Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of maid toxic substances which ultimately were deposited at the Lane Pine Landfill in contravention of State and Pederal Statutes and will be classified as a hauler and/or generator.

- (b-5) Sidney Gelman was an officer, servant, agent and employee of defendant Economy Enterprise who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (c-5) George E. Halo & Sons is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (d-5) Anthony M. Giaquinto was an officer, servant, agent and employee of defendant M & A Salvage who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (e-5) Gilbert Cesspool Service Inc., is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a bauler.

- (f-5) Edward Grabowski was an officer, servant, agent and employee of defendant Manalapan Cartage who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (g-5) Grumman Aerospace Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (h-5) GAF Corporation is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (1-5) Joseph Gale was an officer, servant, agent and employee of defendant Gale Industrial who know that dangerous, becardons and toxic waste materials were being generated or

transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

- (j-5) Gale Industrial Scrap Metal is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (k-5) Games is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (1-5) Garden State Air Conditioning is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the

Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (m-5) Allan S. Garretson was an officer, servant, agent and employee of defendant Russel Reid Company who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (n-5) General Anilone & Film is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (o-5) General Bearing is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (p-5) General Foods is a Corporation which is engaged in

the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (q-5) General Motors is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (r-5) General Electric Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (s-5) William J. Cority was an officer, servant, agent and employee of defendant Bill Gerity Company who know that dankerous, hazardous and toxic waste materials were being

generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

- (t-5) Frank C. Gibson, Inc., is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (u-5) Gilbert Septic Tank Service is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (v-5) Glevento is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (w-5) Gordon & Wilson Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a bauler and/or generator.
- (x-5) F. Grabovski engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into

the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator and/or hauler.

- (y-5) Robert Grabowski engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator and/or hauler.
- (z-5) Gregory Preston Excavating Contractors is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (a-6) Olav Gromann was an officer, servant, agent and employee of defendant Home Dell Construction Company who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (b-6) GTE-Sylvania is a Corporation which is engaged in the business of producing, manufacturing, compounding and

distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (c-6) Guardian Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (d-6) Gumina Construction is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (e-6) C. Whitfield Richards Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (f-6) George E. Halo was an officer, servant, agent and employee of defendant George E. Halo & Sons who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (g-6) Henry Helfrich was an officer, servant, agent and employee of defendant Taylor Pumping who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (h-6) Higgins Disposal Service is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (1-6) Hightstown Borough is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous taxic substances which they caused to be placed into the strain of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (j-6) Holmdel Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (k-6) Hall Construction Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (1-6) Hamilton Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain wasten bauters for removal and disposition of said rogic substances which ultimately were deposited, in contravention of

statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(m-6) Paul R. Hancin was an officer, servant, agent and employee of defendant Kubiak Electric Company who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(n-6) Harmon Color & Chemical is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

husiness of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(p-6) Hargill Supply Co. Inc. is a Corporation which is

engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (q-6) Harris Brothers is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (r-6) Haulaway Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (s-6) Hecht Bros. Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (t-6) H.E.I. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (u-6) E. G. Heller is an individual who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a houler and/or generator.
 - (v-6) Halmotta Borough is a municipality which is engaged

In the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(W-6) Charles L. Hendrickson Jr. was an officer, servant, agent and employee of Hendrickson Excavating who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(x-6) Charles L. Hendrickson Sr. was an officer, servant, agent and employee of defendant Hendrickson Excavating who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(y-6) Hendrickson Excepting Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing interactly dangerous tasic substances which they caused to be placed into the access of commerce by section waste business for removal and disposition

of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

and employee of defendant Provinceline Constructors who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(a-7) Hermetz is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(b-7) Hightstown Borough is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the conception of the landfill in contravention of thate and federal stratutes and will be classified as a hauler and/or generator.

- (c-7) Hightstown Carting is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill, Said defendant will be classified as a generator
- (d-7) Minson Disposal Service is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (e-7) Arthur E. Hochberg was an officer, servant, agent and employee of defendant Millhurst Mills Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the tome Pine (and fill in contravention of State and Federal

Statutes and will be classified as a hauler and/or generator.

- engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (h-7) Howell Sanitation is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a bauler.
- (i-7) Howell Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (j-7) Hudson Iron & Metal is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste barders for removal and disposition of said toxic substances which ultimately were deposited, in

distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (o-7) Industrial Coating Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (p-7) Ingersoll-Rand Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill, Said defendant will be classified as a generator.
- (q-7) F.J. Longile inc. is a Corporation which engaged in the translating and dispositing of various where in and about the Long Pine Landill out will be structived as a butter.

contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(k-7) Walter C. Hurley was an officer, servant, agent and employee of defendant Walter C. Hurley Construction who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(1-7) H. White Trucking is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(m-7) Intra City Waste Materials Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste baulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

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(r-7) Inland is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(s-7) Inmont is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(t-7) Inernational is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

 $(\psi \circ 7)$ loseph W. Lyins was an officer, servent, agent and $\exp(\log x)$ of tyins Disposal Service who knew that dangerous.

(r-7) Inland is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(s-7) Inmont is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(t-7) Inernational is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(u-7) Joseph W. Lvins was an officer, servant, agent and employed of Ivins Disposal Service who knew that dangerous,

hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

- (v-7) Ivins Disposal Service is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (w-7) John Holm & Sons is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (x-7) Jackson Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste baulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (y 7)). D. Construction is a corporation which is engaged in the business of producing, manufacturing, compounding and

distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(z-7) J. A. Jones Co., Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(a-8) J & B Roofing is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

(b-8) Albert Jenkins is an individual which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(c-8) Jersey Central Power & Light Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the

Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- (d-8) Jersey Shore Medical Center is an entity which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (e-8) Jo Mar Fence is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (f-8) Josephson is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (g-8) Joseh Ostroski Jr. Excavating is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (h-8) J.R.S. Lumber Supply Co., Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (i-8) J. Vinch & Sons is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (j-8) Kenasburg Borough is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (k-8) William L. Kaplin was an officer, servant, agent and employee of Monmouth Merchandising Co. who knew that dangerous, hazardous and toxic waste materials were being generated or

transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

- (1-8) Walter Karluck is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (m-8) Keith Lackey Lawn Service is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (n-8) Thomas P. Kiely was an officer, servant, agent and employee of Thomas Proctor Co. Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (o-8) Kingsley Square is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain

statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (s-8) Kov Enterprises is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (t-8) King Heating & Cooling is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (u-8) Paul Kovalski is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (v-8) Kubiak Electric Co. Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition

of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.

- engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (x-8) Levit & Sons is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal Statutes and will be classified as a hauler and/or generator.
- (y-8) Long Branch Sewerage Authority is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited at the Lone Pine Landfill in contravention of State and Federal

Statutes and will be classified as a hauler and/or generator.

- (z-8) Keith J. Lackey was an officer, servant, agent and employee of Keith J. Lackey Lawn Service who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (a-9) Lac American is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (b-9) Murray Lagorski was an officer, servant, agent and employee of Taylor Mills who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (c-9) Edward Lahaye was an officer, servant, agent and employee of Olsen & Hassols, Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and

disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

- (d-9) Ron Lake is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (e-9) Lawrence Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (f-9) I. Landau is an individual who engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (g-9) Lerit, Henderson & Casey is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (h-9) Jerome Lightman was an officer, servant, agent and employee of Lightman Drug Company who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (i-9) Lightman Drug Company is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (j-9) Living Systems, Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal

statutes and will be classified as a hauler and/or generator.

- (k-9) Long Branch Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (1-9) Lopaton Construction is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (m-9) Lower Bucks County is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (n-9) Luckins Steel is a Corporation which is engaged in

the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (o-9) M & A Salvage is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (p-9) Manalapan Cartage Service is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (q-9) Manalapan Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic

substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (r-9) Marlboro Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (s-9) Marlene J. Mozer was an officer, servant, agent and employee of Intra City Waste Materials who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (t-9) Millstone Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in

contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (u-9) Minnesota Mining & Mfg. Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (v-9) MEK is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (w-9) Meadowbrook Cartage Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (x-9) Monmouth Sanitation Service is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (y-9) Monroe Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (z-9) Monroe Twp. Municipal Utilities Auth. is a Corp. which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (a-10) Maas & Weldstein is a Corporation which is engaged in the business of producing, manufacturing, compounding and

distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(b-10) Marian B. Macaulay was an officer, servant, agent and employee of New Jersey Turnpike Authority who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(c-10) Manalapan Cartage is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(d-10) Manzo Excavating Co. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(e-10) Marlboro Psychiatric Hospital is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal

statutes and will be classified as a hauler and/or generator.

- (f-10) Roger Martin was an officer, servant, agent and employee of Quality Roofing Co. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (g-10) William Martin was an officer, servant, agent and employee of Martin Realty Development Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (h-10) Martin Realty Development Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (i-10) Matlack is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they

caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (j-10) Matty's Auto Body Shop is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (k-10) Mazza & Sons is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (1-10) Maxwell House is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (m-10) J. Matthews is an individual who engaged in the business of producing, manufacturing, compounding and

distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(n-10) MCB Company is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(o-10) Sylvester McKelvey was engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(p-10) J. F. McGreevey is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(q-10) McKelvey Furniture Company is a Corporation which

is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(r-10) Meadowbrook Carting Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(s-10) M. Edwards Light Trucking Contractor is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(t-10) Harry W. Megill is an individual who engaged in the hauling and disposing of various waste in and about the Lone

Pine Landfill and will be classified as a hauler.

(u-10) Thomas A Meholic was an officer, servant, agent and employee of Ocean Township Sewer Authority who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(v-10) Eugene Melody was an officer, servant, agent and employee of Monmouth County Highway Dept. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(w-10) Jay M. Meyers was an officer, servant, agent and employee of N. J. Si Movers who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(x-10) Mihn's Boat Yard is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain

waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (y-10) Merck Pharmaceutical is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (z-10) Mills Crane is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (a-11) Mideast Aluminum is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of

statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(b-11) Millhurst Mills Inc. is a Corproration which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(c-11) M & T Chemical is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(d-ll) Mobile Chemical is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (e-11) Monmouth Battlefield State Park is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (f-11) Monmouth County Bridge Dept. is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (g-11) Monmouth County Highway Department is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (h-ll) Monmouth County Highway Department is an entity which is engaged in the business of producing, manufacturing,

compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (i-11) Momouth County Historical Association is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (j-11) Monmouth County National Park is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (k-11) Monmouth County Parks Department is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(1-11) Monmouth County Shade Tree Comm. is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(m-11) Mon. Freehold Industrial Park is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(n-11) Monmouth Mechanical Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the

Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(o-11) Mon. Merchandising Co. Inc., is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(p-11) Monmouth Municipal Utility is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(q-11) Monroe Township is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(r-11) Monroe Twp. Municipal Utilities is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(t-11) Frank M. Muccio is an individual who engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(u-11) J. Mount is an individual who engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine

Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(v-11) National Waste Disposal Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(w-11) Nepera Chemical Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(x-11) Nestle Co. Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(y-11) Sherman Nelson was an officer, servant, agent and employee of Farmingdale Borough, who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(z-11) New Egypt Salvage is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(a-12) New England Laminates is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(b-12) City of New Brunswick is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic

substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(c-12) N.J. Dept. of Human Services is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(d-12) N.J. Dept. of Transportation is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(e-12) N.J. International Movers Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition

of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(f-12) N.J. Turnpike Authority is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(g-12) NL Industries is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(h-12) North Brunswick Township is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said

defendant will be classified as a generator.

- (i-12) NWL Transformers is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (j-12) Owens Corning is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (k-12) Owens-Illinois Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (1-12) Ocean Twp. Sewer Authority is an entity which is

engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(m-12) John A. Olbis is an individual engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(n-12) Amund J. Olsen was an officer, servant, agent and employee of Olsen & Hassold Services, Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(0-12) Olsen & Hassold, Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(p-12) Oneida Packaging Co. is a Corporation which is

engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(q-12) On-Site Construction Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(r-12) Orrs Motor is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(s-12) Ohio Casualty Insurance Co. which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they

caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(t-12) Joseph Ostroski, Jr. was an officer, servant, agent and employee of Joseph Ostroski Jr. Excavating who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(u-12) Stout O'Sullivan engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(v-12) Pineland Septic Service is a corporation engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(w-12) John J. Pinto was an officer, servant, agent and employee of Meadowbrook Cartage who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(x-12) Passaic County is a municipality which is engaged

in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (y-12) Pen Chemical is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (z-12) Pennwalt Corporation is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (a-13) Pennyweight & Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they

caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (b-13) Stanley R. Perrine is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (c-13) Peter J. Saker Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (d-13) Pfizer is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (e-13) Plainsboro Township is an entity which is engaged in the business of producing, manufacturing, compounding and

distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (f-13) Plant Food is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (g-13) Al Pomponio was an officer, servant, agent and employee of Pomponio Trucking & Excavating who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (h-13) Pomponio Trucking & Excavating is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition

of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (i-13) P. Pinto & Son is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (j-13) Ida Preston was an officer, servant, agent and employee of Raymond Preston Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (k-13) Preston Excavating is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (1-13) Princeton Nurseries is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (m-13) Princeton Township is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (n-13) Thomas Proctor was an officer, servant, agent and employee of Thomas Proctor Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (o-13) Provinceline Constructors Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic

substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (p-13) Pyrolca is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (q-13) Gerald Quaglietta was an officer, servant, agent and employee of Monmouth Sanitation Service who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (r-13) Quality Roofing Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in

contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(s-13) RCA is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(t-13) John W. Richardson Jr. was an officer, servant, agent and employee of Atlantic Sanitation who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(u-13) Rohm & Haas Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(v-13) Roosevelt Borough is a municipality which is

engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

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(w-13) R & R is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(x-13) Rancocas Valley Refuse Disposal is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(y-13) Randolph Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said

defendant will be classified as a generator.

(z-13) Raymond C. Raymond was an officer, servant, agent and employee of Pennywright & Co. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(a-14) Raymond Preston Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(b-14) Stuart Reiner is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(c-14) Revlon is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be

classified as a generator.

(d-14) Refined Onyx is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

Mail:

(e-14) Reliance Universal is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(f-14) Recycling Industries is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(g-14) Rheem is a Corporation which is engaged in the

is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

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(1-14) R. L. Trucking is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(m-14) Crescent Roselle was an officer, servant, agent and employee of Waste Disposal Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(n-14) Seymour Rosenfarb was an officer, servant, agent and employee of R & R Sanitation who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and

is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(1-14) R. L. Trucking is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(m-14) Crescent Roselle was an officer, servant, agent and employee of Waste Disposal Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(n-14) Seymour Rosenfarb was an officer, servant, agert and employee of R & R Sanitation who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and

disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(o-14) Harry W. Rosh was an officer, servant, agent and employee of Monmouth County Highway Dept. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(p-14) R.T.D. Carting is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(q-14) Russell Reid Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(r-14) Scientific Chemical Processing is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition

of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (s-14) Leif R. Sigmond was an officer, servant, agent and employee of Scientific Chemical Processing who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (t-14) Solvents Recovery Service Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (u-14) Southern Monmouth Regional Sewerage is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (v-14) John Saker was an officer, servant, agent and employee of Peter J. Saker Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or

transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

- (w-14) P. Saker was an officer, servant, agent and employee of Peter J. Saker, Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (x-14) Sano Carting Co. Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (y-14) Robert W. Sellers was an officer, servant, agent and employee of Pineland Septic who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (z-14) Richard Schnable was an officer, servant, agent and employee of Schnable Tire Company who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and

disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

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(a-15) Schnable Tire Company is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(b-15) Joseph L. Sessock was an officer, servant, agent and employee of C & J Contracting Co. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(c-15) Schaeffer is a corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (d-15) Schenectady Chemicals which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (e-15) David C. Shadle was an officer, servant, agent and employee of Jersey City Power and Light who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (f-15) David C. Shaw was an officer, servant, agent and employee of Monmouth County Shade Tree Comm. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (g-15) Joseph F. Shannon was an officer, servant, agent and employee of All-In-One who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed

there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(h-15) Seymour Silver was an officer, servant, agent and employee of Silver Enterprises who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(i-15) Silver Enterprises Inc. is a Corporation which engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(j-15) Silvert's Furniture is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(k-15) Sika Chemicals is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(1-15) I. Shrott engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(m-15) John B. Smith was an officer, servant, agent and employee of S & S Disposal who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(n-15) T. Fred Smith engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into

the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (0-15) Steven J. Sobechko was an officer, servant, agent and employee of Englishtown Auction Sales who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (p-15) Solite is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (q-15) Squibb is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of

statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(r-15) S & S Disposal Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(s-15) Steinbach Co. is a Corporation engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(t-15) Star Expension is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(u-15) E. G. Steller engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(v-15) Robert Stinson was an officer, servant, agent and employee of J & B Roofing who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(w-15) Pat K. Stromwasser was an officer, servant, agent and employee of Freehold Lumber Co. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(x-15) Swan Pump & Supply Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(y-15) Taylor Pumping Service is a Corporation engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(z-15) Toms River Chemical Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(a-16) Twin County Disposal Inc. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the

Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (b-16) Leonard E. Taft was an officer, servant, agent and employee of On-Site Construction which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited in contravention of statutes, in the Lone Pine Landfill and will be classified as a hauler and/or generator.
- (c-16) Gabrielle J. Tascione was an officer, servant, agent and employee of N.J. Human Services who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (d-16) Taylor Mills is a Corporation engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (e-16) T. D. DePonte Excavating is a Corporation engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (f-16) Harold R. Test engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will

be classified as a hauler.

- (g-16) Tech Coatings is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (h-16) Tenneco is a corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (i-16) Tenox is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
 - (j-16) Thomas Proctor Co. Inc. is a Corporation engaged in

the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (k-16) Voorhees J. Thompson was an officer, servant, agent and employee of Thompson Disposal who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (1-16) Thompson Disposal which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (m-16) Tidewater Distribution is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of

commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(o-16) Dennis Timmerman was an officer, servant, agent and employee of Beth's Landscaping who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(p-16) James J. Truncer was an officer, servant, agent and employee of Monmouth County Park Dept. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(r-16) Union Carbide is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(s-16) Frank Ulatowski was an officer, servant, agent and employee of Frank's Auto Repair who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(t-16) Vogal-Brewester is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(u-16) Roger W. Vogel is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

- (w-16) Ward Brothers Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (x-16) Waste Disposal Inc. is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (y-16) Water Tunnel Construction Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (z-16) Western Monmouth Utilities is a corporation which ns engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (a-17) West Windsor Township is an entity which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain

waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (b-17) Alvin H. White was an officer, servant, agent and employee of Atlantic Disposal who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (c-17) Windsor Septic is a Corporation which is engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (d-17) Worthington Biochemical Corp. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- (e-17) Wall Township is a municipality which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain

waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(f-17) Walter C. Hurley Construction Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

(g-17) William F. Ward Sr. was an officer, servant, agent and employee of Ward Brothers Inc. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(h-17) West Long Branch Equipment is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said

defendant will be classified as a generator.

- (i-17) Western Electric Co. is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (j-17) White Trucking is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.
- (k-17) Hans J. Wiese was an officer, servant, agent and employee of Monmouth Medical Corp. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (1-17) Wilenta Bros. Carting is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal

statutes and will be classified as a hauler and/or generator.

(m-17) Peter B. Wilenta was an officer, servant, agent and employee of Wilenta Bros. Carting who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(n-17) Arthur O. Wilson was an officer, servant, agent and employee of Gordon & Wilson Co. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(o-17) Windsor Pumping is a Corporation which engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(p-17) Gilbert Winsten was an officer, servant, agent and employee of Hargill Supply Co. who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(q-17) Woodridge Township is an entity which is engaged in

the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.

- (r-17) Frank L. Whitman was an officer, servant, agent and employee of Freehold Regional High School who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.
- (s-17) Wonderick is a Corporation which is engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which ultimately were deposited, in contravention of statutes, in the Lone Pine Landfill. Said defendant will be classified as a generator.
- (t-17) David Wright is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(u-17) W.T.E. is a Corporation which engaged in the

hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(v-17) John M. zuccardelli III was a servant, agent and employee of National Waste Disposal who knew that dangerous, hazardous and toxic waste materials were being generated or transported to the Lone Pine Landfill and were being dumped and disposed there in contravention of applicable State and Federal regulations. Said defendant will be classified as a hauler and/or generator.

(w-17) Alexander Francis Zydallas is an individual who engaged in the hauling and disposing of various waste in and about the Lone Pine Landfill and will be classified as a hauler.

(x-17) John Doe engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

(y-17) John Roe engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which he caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately

deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.

- (z-17) XYZ Corporation is a Corporation which engaged in the business of producing, manufacturing, compounding and distributing inherently dangerous toxic substances which they caused to be placed into the stream of commerce by certain waste haulers for removal and disposition of said toxic substances which were ultimately deposited at the Lone Pine Landfill in contravention of State and Federal statutes and will be classified as a hauler and/or generator.
- 14. JOSEPH V. LORE and ELEANOR LORE are the owners of property situated in Monmouth County which borders on the waters of the Manasquan River. Said property has been severely reduced in value because of the pollution of the headwaters of the Manasquan River. The said plaintiffs bring this action as members of a class unit.
- 15. The Plaintiffs' real property and riprarian rights have been severely and permanently damaged and diminished because of the hazardous waste and toxic substances which have polluted the headwaters of the Manasquan River.

WHEREFORE, the plaintiffs, JOSEPH V. LORE and ELEANOR LORE, demand judgment against the defendants for damages and costs of suit.

SECOND COUNT

1. Plaintiffs JAMES DEITZ and MODESTA S. DEITZ repeat all

the hazardous waste and toxic substances which have polluted the headwaters of the Manasquan River.

WHEREFORE, the plaintiff KENNETH MC KENZIE demands judgment on this count against the defendants for damages and costs of suit.

FOURTH COUNT

- 1. Plaintiffs CAMERON J. HILLMANN and MILDRED L. HILLMANN repeat all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. CAMERON J. HILLMANN and MILDRED L. HILLMANN are the owners of property situated in Monmouth County which borders on the waters of the Manasquan River. Said property has been severely reduced in value because of the pollution of the headwaters of the Manasquan River. The said plaintiffs bring this action as members of a class unit.
- 3. The plaintiffs' real property and riparian rights have been severely and permanently damaged and diminished because of the hazardous waste and toxic substances which have polluted the headwaters of the Manasquan River.

WHEREFORE, the plaintiffs CAMERON J. HILLMANN and MILDRED L. HILLMANN demand judgment on this count against the defendants for damages and costs of suit.

FIFTH COUNT

- 1. The RATON HOLDING CO. is a corporation licensed to transact business in the State of New Jersey.
 - 2. Said corporation has its principal place of business in

Monmouth County, Said plaintiff brings this action as a member of a class who have sustained similar losses as a result of the negligence of the Lone Pine Corporation, its agents, servants and employees.

- 3. The plaintiff, RATON HOLDING CO., repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 4. The Plaintiff, RATON HOLDING CO., owns waterfront property on the Metedeconk River, which land is a vital useful asset to its business operation.
- 5. As a direct and proximate result of the negligence of the defendant corporation, its agents, servants and employees, the said RATON HOLDING CO. has sustained a diminution of its business, as well as a diminution of its property values, and will continue to do so in the future.

WHEREFORE, The Plaintiff, RATON HOLDING CO., demands judgment against the defendants for damages and costs of suit.

SIXTH COUNT

- 1. Plaintiffs, ROBERT T. SEAMAN, SR., and MARIAN J. SEAMAN, repeat all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. ROBERT T. SEAMAN, SR.. and MARIAN J. SEAMAN, are the owners of property situated in Monmouth County which are in close proximity to the landfill. As a result of said proximity, said property has been exposed to the pollution of the landfill and pollution of the headwaters of the Manasquan River and has been severely reduced in value because of said pollution. The said plaintiffs bring this action as members of a class unit.
- 3. The plaintiffs' real property and riparian rights have been severely and permanently damaged and diminished because of the hazardous waste and toxic substances which have polluted their property and the headwaters of the Manasquan River.

WHEREFORE, the plaintiffs ROBERT T. SEAMAN, SR. and MARIAN J. SEAMAN, demand judgment on this count against the defendants for damages and costs of suit.

SEVENTH COUNT

- 1. Plaintiff ROBERT T. SEAMAN, SR. repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The said ROBERT T. SEAMAN, SR., has been exposed to noxious and hazardous substances as a result of the pollution of the surrounding air, land and water supplies polluted as a result of the negligent disposal and retention of hazardous

waste materials at the Lone Pine Landfill.

3. As a direct and proximate result of the negligence of the defendants, their servants, agents and employees, the said plaintiff, ROBERT T. SEAMAN, SR., has sustained severe and permanent personal injury, has and will in the future suffer pain, has been and will in the future be compelled to expend large sums of money in an endeavor to cure himself of said injuries, and he has been and will in the future be disabled and prevented from attending to his necessary affairs and business.

WHEREFORE, the plaintiff ROBERT T. SEAMAN, SR., demands judgment against the defendants for damages and costs of suit.

EIGHTH COUNT

- 1. Plaintiff, MARIAN J. SEAMAN, repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The Plaintiff, MARIAN J. SEAMAN, is the wife of the plaintiff, ROBERT T. SEAMAN, SR.
- 3. As a result of the aforesaid negligence, the plaintiff, MARIAN J. SEAMAN, has been and will in the future be deprived of the services and consortium of her husband.

WHEREFORE, Plaintiff, MARIAN J. SEAMAN, demands judgment on this count against the defendants for damages and costs of suit.

NINTH COUNT

- 1. Plaintiff MARIAN J. SEAMAN, repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The said MARIAN J. SEAMAN has been exposed to noxious and hazardous substances as a result of the pollution of the surrounding air, land and water supplies polluted as a result of the negligent disposal and retention of hazardous waste materials at the Lone Pine Landfill.
- 3. As a direct and proximate result of the negligence of the defendants, their servants, agents and employees, the said plaintiff, MARIAN J. SEAMAN, has sustained severe and permanent personal injury, has and will in the future suffer pain, has been and will in the future be compelled to expend large sums of money in an endeavor to cure herself of said injuries, and she has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE, the plaintiff MARIAN J. SEAMAN, demands judgment against the defendants for damages and costs of suit.

TENTH COUNT

- 1. Plaintiff, ROBERT T. SEAMAN, SR., repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The Plaintiff, ROBERT T. SEAMAN, SR., is the husband of the plaintiff, MARIAN J. SEAMAN.
 - 3. As a result of the aforesaid negligence, the plaintiff,

ROBERT T. SEAMAN, SR., has been and will in the future be deprived of the services and consortium of his wife.

WHEREFORE, Plaintiff, ROBERT T. SEAMAN, SR., demands judgment on this count against the defendants for damages and costs of suit.

ELEVENTH COUNT

- 1. Plaintiffs FELIX J. MC CABE and CAROL A. MC CABE, repeat all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. FELIX J. MC CABE and CAROL A. MC CABE, are the owners of property situated in Monmouth County which are in close proximity to the landfill. As a result of said proximity, said property has been exposed to the pollution of the landfill and pollution of the headwaters of the Manasquan River and has been severely reduced in value because of said pollution. The said plaintiffs bring this action as members of a class unit.
- 3. The plaintiffs' real property and riparian rights have been severely and permanently damaged and diminished because of the hazardous waste and toxic substances which have polluted their property and the headwaters of the Manasquan River.

WHEREFORE, the plaintiffs FELIX J. MC CABE and CAROL A. MC CABE, demand judgment on this count against the defendants for damages and costs of suit.

TWELFTH COUNT

- 1. Plaintiff CAROL A. MC CABE, repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The said CAROL A. MC CABE has been exposed to noxious and hazardous substances as a result of the pollution of the surrounding air, land and water supplies polluted as a result of the negligent disposal and retention of hazardous waste materials at the Lone Pine Landfill.
- 3. As a direct and proximate result of the negligence of the defendants, their servants, agents and employees, the said plaintiff, CAROL A. MC CABE, has sustained severe and permanent personal injury, has and will in the future suffer pain, has been and will in the future be compelled to expend large sums of money in an endeavor to cure herself of said injuries, and she has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE, the plaintiff, CAROL A. MC CABE, demands judgment against the defendants for damages and costs of suit.

THIRTEENTH COUNT

- 1. Plaintiff, FELIX J. MC CABE, repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The Plaintiff, FELIX J. MC CABE, is the husband of the plaintiff, CAROL A. MC CABE.
 - 3. As a result of the aforesaid negligence, the plaintiff,

FELIX J. MC CABE, has been and will in the future be deprived of the services and consortium of his wife.

WHEREFORE, Plaintiff, FELIX J. MC CABE, demands judgment on this count against the defendants for damages and costs of suit.

FOURTEENTH COUNT

- 1. Plaintiff CATHERINE LOWENBURG, repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The said CATHERINE LOWENBURG has been exposed to noxious and hazardous substances as a result of the pollution of the surrounding air, land and water supplies polluted as a result of the negligent disposal and retention of hazardous waste materials at the Lone Pine Landfill.
- 3. As a direct and proximate result of the negligence of the defendants, their servants, agents and employees, the said plaintiff, CATHERINE LOWENBURG, has sustained severe and permanent personal injury, has and will in the future suffer pain, has been and will in the future be compelled to expend large sums of money in an endeavor to cure herself of said injuries, and she has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE, the plaintiff, CATHERINE LOWENBURG, demands judgment against the defendants for damages and costs of suit.

FIFTEENTH COUNT

- 1. Plaintiff KAREN WARD, repeats all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. The said KAREN WARD has been exposed to noxious and hazardous substances as a result of the pollution of the surrounding air, land and water supplies polluted as a result of the negligent disposal and retention of hazardous waste materials at the Lone Pine Landfill.
- 3. As a direct and proximate result of the negligence of the defendants, their servants, agents and employees, the said plaintiff, KAREN WARD, has sustained severe and permanent personal injury, has and will in the future suffer pain, has been and will in the future be compelled to expend large sums of money in an endeavor to cure herself of said injuries, and she has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE, the plaintiff, KAREN WARD, demands judgment against the defendants for damages and costs of suit.

SIXTEENTH COUNT

- 1. Plaintiffs ARTHUR PONTRELLI and SARAH PONTRELLI repeat all of the allegations with regard to the above and makes them a part hereof as if set forth at length herein.
- 2. ARTHUR PONTRELLI and SARAH PONTRELLI are the owners of property situated in Monmouth County which borders on the waters of the Manasquan River. Said property has been severely reduced in value because of the pollution of the headwaters of

the Manasquan River. The said plaintiffs bring this action as members of a class unit.

3. The plaintiffs' real property and riparian rights have been severely and permanently damaged and diminished because of the hazardous waste and toxic substances which have polluted the headwaters of the Manasquan River.

WHEREFORE, the plaintiffs, ARTHUR PONTRELLI and SARAH PONTRELLI, demand judgment on this count against the defendants for damages and costs of suit.

JURY DEMAND

Plaintiffs hereby demand trial by jury on all issues of the within cause.

GEORGE J. SHAMY, JR.

ATTORNEY FOR PLAINTIFFS

EXHIBIT A

JOSEPH V. LORE and ELEANOR LORE 305 Woodland Road Point Pleasant, New Jersey 08742

JAMES DEITZ and MODESTA S. DEITZ 303 Woodland Road Point Pleasant Beach, New Jersey 08742

KENNETH MC KENZIE 910 Stonehedge Lane Point Pleasant, New Jersey 08742

CAMERON J. HILLMANN and MILDRED L. HILLMANN 305 Lincoln Avenue Point Pleasant Beach, New Jersey 08742

RATON HOLDING CO. 40 Robbins Road Bricktown, New Jersey 08723

MR. AND MRS. ROBERT T. SEAMAN BOX 96, Stonehill Road Freehold, New Jersey 07728

MR. AND MRS. FELIX MC CABE Georgia Road Freehold, New Jersey 07728

MRS. CATHERINE LOWENBURG 675 Manalapan Road Bricktown, New Jersey 08723

MRS. KAREN WARD 675 Manalapan Road Bricktown, New Jersey 08723

ARTHUR PONTRELLI AND SARAH PONTRELLI 849 Arnold Avenue Point Pleasant, New Jersey

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CHARGE TO THE ACCOUNT OF THE TOWNSHIP OF EAST BRUNSWICK

Account #0026170-02

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LAW

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BUSCH AND

99 BAYARD STREET NEW BRUNSWICK, N. J. 08903 (201) 247 - 1017

ATTORNEYS FOR Defendant, Township of East Brunswick



JOSEPH V. LORE, et als,

Plaintiffs.

~Vg ~

LONE PINE CORPORATION, et als,

Defendants.

SUPERTOR COURT OF NEW JERSEY LAW DIVISION MONMOUTH COUNTY

Docket No. L-033606-85

CIVIL ACTION

ANSWER, CROSSCLAIM FOR CON-TRIBUTION, CROSSCLAIM FOR INDEMNIFICATION, DEMAND FOR STATEMENT OF DAMAGES, DEMAND FOR PRODUCTION OF DOCUMENTS. DEMAND FOR JURY TRIAL, DESIGNA-TION OF TRIAL COUNSEL and CERTIFICATION

Defendant, Township of East Brunswick, a municipal corporation of the State of New Jersey, having its principal offices at 1 Jean Walling Civic Center, East Brunswick. New Jersey, by way of answer to the Complaint, says:

AS TO THE FIRST COUNT

It has insufficient information to form a belief as 1. to the truth of the allegations contained in Paragraph 1.

- 2. It denies the allegations contained in Paragraph 2.
- 3. It has insufficient information to form a belief as to the truth of the allegations contained in Paragraphs 3, 4 and 5
- 4. It denies the allegations contained in Paragraphs 6, 7 and 8 to the extent that they are directed against this Defendant.
- 5. It has insufficient information to form a belief as to the truth of the allegations contained in Paragraph 9.
- 6. It denies the allegations contained in Paragraphs 10, 11, 12 and 13 to the extent that they are directed against this Defendant.
- 7. It denies the allegations contained in Paragraphs 14 and 15.

AS TO THE SECOND COUNT

- 1. It repeats its answer to the allegations contained in the First Count and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE THIRD COUNT

- 1. It repeats its answer to the allegations contained in the First and Second Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE FOURTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second and Third Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE FIFTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third and Fourth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2, 3, 4 and 5.

AS TO THE SIXTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth and Fifth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE SEVENTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth and Sixth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs and 3.

AS TO THE EIGHTH COUNT

1. It repeats its answer to the allegations contained

in the First, Second, Third, Fourth, Fifth, Sixth and Seventh

2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE NINTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth, Sixth, Seventh and Eighth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE TENTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth and Ninth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs2 and 3.

AS TO THE ELEVENTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth Ninth and Tenth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE TWELFTH COUNT

1. It repeats its answer to the allegations contained

in the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth and Eleventh Counts and incorporates the same herein by reference.

2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE THIRTEENTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh and Twelfth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE FOURTEENTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, Twelfth and Thirteenth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE FIFTEENTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, Twelfth, Thirteenth and Fourteenth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

AS TO THE SIXTEENTH COUNT

- 1. It repeats its answer to the allegations contained in the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, Twelfth, Thirteenth, Fourteenth and Fifteenth Counts and incorporates the same herein by reference.
- 2. It denies the allegations contained in Paragraphs 2 and 3.

FIRST SEPARATE DEFENSE

The Complaint should be dismissed against this Defendant on the grounds that it fails to set forth a cause of action.

SECOND SEPARATE DEFENSE

The Complaint should be dismissed against this Defendant on the grounds that the Plaintiffs failed to comply with the Tort Claims and failed to give any notice whatsoever to the Township of East Brunswick in accordance with Title 59 of New Jersey Statutes. Accordingly, the Complaint must be dismissed as to this Defendant.

THIRD SEPARATE DEFENSE

The Complaint should be dismissed against this Defendant on the grounds that no action taken by this Defendant could possibly have been considered palpably unreasonable according to the standards of the Tort Claims Act and the Complaint should be dismissed under the negligence standards set forth in Title 59 of New Jersey Statutes.

FOURTH SEPARATE DEFENSE

The Complaint should be dismissed on the grounds that this Defendant cannot be subject to suit outside of Middlesex County.

FIFTH SEPARATE DEFENSE

The Complaint should be dismissed against this Defendant on the grounds that the negligence of the Plaintiffs exceeded that of the Defendants under the Comparative Negligence Doctrine.

SIXTH SEPARATE DEFENSE

The Complaint should be dismissed against this Defendant based upon the expiration of the Statute of Limitations.

CROSSCLAIM FOR CONTRIBUTION

This Defendant hereby demands contribution from all other Defendants under the terms and conditions of the New Jersey Joint Tortfeasors Contribution Act.

CROSSCLAIM FOR INDEMNIFICATION

This Defendant, while denying the allegations contained in the Complaint, is entitled to be indemnified by each of the other Co-Defendants on the grounds that the actions of this Defendant, if considered to be negligent, would be technical, vicarious, imputed and passive while the actions of the Co-Defendants would be the active, actual and primary cause of Plaintiffs' lose.

Wherefore, this Defendant demands indemnification from all Co-Defendants for all monies paid by way of settlement or judgment, interest, counsel fees and costs.

DEMAND FOR STATEMENT OF DAMAGES

This Defendant hereby demands that the Plaintiffs furnish the undersigned, within five (5) days pursuant to Rule 4:5-2, with a statement of damages.

DEMAND FOR PRODUCTION OF DOCUMENTS

This Defendant hereby demands that the Plaintiffs furnish the undersigned, within five (5) days pursuant to Rule 4:18-2 with copies of all documents indicating that this Defendant in any way was responsible for Plaintiffs' lose.

DEMAND FOR JURY TRIAL

This Defendant hereby demands a trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of Rule 4:25-4, the Court is advised that Bertram E. Busch is hereby designated as trial counsel.

CERTIFICATION

I certify that, to the best of my knowledge, the matter in controversy in not the subject to any other action or arbitration proceeding, now or contemplated, and that no other parties should be joined in this action pursuant to Rule 4:5-1.

BUSCH AND BUSCH, ESQS. Attorneys for Defendant, Township of East Prynswick

Ву

A Member of the Firm

June 12, 1985

I hereby certify that the within pleading was filed and served within the time period allowed by the Rules of Court.

BERTRAM E. BUSCH

REC'D. & FILED SUPERIOR COURT. OF NEW JERSEY

JUN 24 1985

M.V. 9 JOHN M. MAYSON CLERK

Attorney(s): Busch and Busch, Esqs.

Office Address & Tel. No.: 99 Bayard Street, New Brunswick, NJ 08903

Attorney(s) for Township of East Brunswick (201) 247-1017

JOSEPH V. LORE, et al

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MONMOUTH COUNTY

Plaintiff(s)

vs.

Docket No. L-033606-85

CIVIL ACTION NOTICE OF MOTION

LONE PINE CORPORATION, et al

Defendant(s)

TO: Shamy and Luke, 178 Livingston Avenue, New Brunswick, NJ 08901

Take Potice that the undersigned will apply to the above named Court, at

Court House, Freehold, New Jersey
on July 12, , 1985 , at 9 A.M. o'clock, or as soon thereafter as counsel may
be heard, for an Order dismissing the Complaint for failure to comply
with the provisions of the New Jersey Tort Claims Act.

We will rely on the attached Brief.

upon the following grounds:

There is no trial date or Pretrial date in this matter.

Pursuant to R. 1:6-2(d), the undersigned:

(xxx) waives oral argument and consents to disposition on the papers.

) does not request oral argument at this time.

) requests oral argument.

A proposed form of Order is annexed.

Dated: June 21,

, *19*85

C. EDWARD SPEIDEL

CERTIFICATION

I certify that the within pleading was filed with the Clerk of the Superior Court in Trenton, a copy was filed with the Clerk of Monmouth County and copies were served upon the attorneys of record by ordinary mail on June 21, 1985.

DATED: June 21, 1985

C. EDWARD SPEIDEL

SACHS & SACHS 45 E. Main St. (P.O. Box 394) Holmdel, N.J. 07733 (201) 946-4620 Various Attorneys for /Defendants

JOSEPH V. LORE, et als,

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - MONMOUTH COUNTY

DOCKET NO. L-033606-85

v.

LONE PINE CORPORATION, et als,

Defendants.

Plaintiffs,

Civil Action

EXTENSION OF TIME

It is hereby stipulated and agreed by and between the parties hereto that the time of defendants Eugene Melody, Monmouth County Bridge Dept., Monmouth County Highway Dept., Monmouth * (see to answer or otherwise plead in response to the Complaint be, below) and the same hereby is, extended for a period of thirty (30) days from the date hereof.

SHAMY & LUKE Plaintiffs Attorneys for

SACHS & SACHS Various Attorneys for Defendant

County Parks Dept., Monmouth County Shade Tree Commission, Harry Rosh (Rash), David Shaw and James J. Truncer

Dated: July 1, 1985

FILED

AUG 26 1985

JOSEPH BUTTAFUOCO 64-72 Schuyler Avenue WALTER H. GEHRICKE, J.S.C.

Kearny, NJ

(Harrison Post Office 07029) REC'D & F SUPERIOR COURT

(201) 998-7355

Attorney for Defendant(s) OF NEW JERSEY

Paul Kovalski

vs.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MONMOUTH COUNTY DOCKET NO. L-033606-85

MONMOUTH COUNTY

AUG 2 3 1985

JAINE G. CLAYTON

County Clerk

JOSEPH V. LORE, et al

Pitt JOHN M. MAYSON Plaintiff(s), CLERK

Civil Action

CONSENT ORDER EXTENDING TIME TO SERVE ANSWER

REC'D. & FILED SUPERIOR COURT OF NEW JERSEY

LONE PINE CORPORATION, et al

SEP 11 1985

Defendant(s).

M.V. 22 JOHN M. MAYSON

The matter being opened to the Court by Joseph Buttafuoco, attorney for the defendant(s), Paul Kovalski, on motion to enlarge the time of said defendant(s) to serve and file an Answer to the Complaint or otherwise plead in this action, and George J. Shamy, Jr. attorney for the plaintiff consenting thereto; and the Court being of the opinion that good cause for such enlargement of the time to Answer or otherwise plead has been shown;

IT IS on this 26 day of August, 1985, ORDERED that the time of the defendant(s), Paul Kovalski, to serve and file an Answer to the Complaint of the plaintiff or otherwise plead in this matter be extended to the 6 day of September, 1985.

I hereby-consent to the form and entry of the within Order.

WALTER H. GEHRICKE J.S.C.

Attorney for Plaintiff(s)

Jo

REC'D. & SUPERIOR COURT OF NEW JERSEY

SEP 25 1985

M.V. 22 () / JOHN M. MAYSON CLERK



> CLERK

OCT 21 1985
SUPERIOR COURT OF N.J.

PAID

HABER & McGOWAN

ATTORNEYS AT LAW

131 SOUTH BROADWAY

SOUTH AMBOY, NEW JERSEY 08879

(201) 727-1400

(201) 727-1400
ATTORNEY FOR Defendants, Bill Gerity Excavating Co, & William J. Gerity

Plaintiff

Joseph v. Lore, et als.,

vs.

Defendant

Lone Pine Corporation, et als. 69

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION-MONMOUTH COUNTY

Docket No. L - 033606-85

CIVIL ACTION ANSWER

BGEC

Defendants Bill Gerity Excavating Co., whose principal office is located at 1123 Raymond Place, Laurence Harbor, New Jersey, and William J. Gerity residing at Highway 35, Laurence Harbor, New Jersey, by way of Answer say:

FIRST COUNT

1. As to the allegations contained in paragraphs 1 through 12; 13(a) through 13(i-1); 13(k-1) through 13(r-5); and 13(t-5) through 15 of the first Count of the Complaint, the Defendants are without sufficient knowledge or information to either admit or deny said allegations and leave. Plaintiffs to their proofs.

- 2. As to the allegations contained in paragraph 13(j-1), of the First Count of the Complaint, Defendant, Bill Gerity Excavating Co., admits that it is a New Jersey Corporation. Said Defendant, Bill Gerity Excavating Co., denies all other allegations contained in paragraph 13(j-1) of the First Count of the Complaint.
- 3. As to the allegations contained in paragraph 13(s-5) of the Complaint, Defendant, William J. Gerity, admits that he was an officer, servant, agent and employee of Defendant Bill Gerity Excavating Co. Said Defendant, William J. Gerity, denies all other allegations contained in paragraph 13(s-5) of the First Count of the Complaint.

WHEREFORE, Defendants, Bill Gerity Excavating Co., and William J. Gerity, demand judgment against the Plaintiff dismissing the First Count of the Complaint.

SECOND - SIXTEENTH COUNT

- 1. Defendants, Bill Gerity Excavating Co., and William J. Gerity, incorporate those answers set forth in the First Count of the Complaint, as if set forth at length herein.
- 2. Defendants, Bill Gerity Excavating Co., and William J. Gerity are without sufficient knowledge or information to either admit or deny the allegations contained in paragraphs 1 through 3 in the Second through Sixteenth Counts of the Complaint.

WHEREFORE, Defendants, Bill Gerity Excavating Co., and William J. Gerity, demand judgment against the Plaintiffs dismissing the Second through Sixteenth Counts of the Complaint.

SEPARATE DEFENSE

1. Plaintiffs fail to set forth a claim upon which relief can be granted.

JURY DEMAND

Defendants demand trial by jury on all issues and will not be satisfied with the verdict of a jury of less than six.

HABER & McGOWAN
Attorneys for Defendants,
Bill Gerity Excavating Co.,
and William J. Gerity

Ву:

HANA BARRON, ESQ.

DATED: September 20, 1985

CERTIFICATION

I hereby certify that the Original of the within arswer was filed with the Clerk of the Court and a copy thereof was served upon counsel for plaintiff, Shamy & Luke, 178 Livingston Avenue, New Brunswick, New Jersey, 08901, by ordinary mail within the time prescribed by the Rules of the Court.

SHANA BARRON. ESO.

DATED: September 20, 1985

REC'D. & FILED SUPERION COURT OF NEW JERSEY

JUL 22 1985

M.V. 17 Iohn M. Maysom Clerk

SACHS & SACHS 45 E. Main St. (P.O. Box 394) Holmdel, N.J. 07733 (201) 946-4620

Attorneys for Defendants Melody, Rash, Shaw, Truncer, Monmouth County Bridge, Highway and Parks Departments and Monmouth County Shade Tree Commission

JOSEPH LORE, et als.,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MONMOUTH COUNTY

Plaintiffs,

DOCKET NO. L-033606-85

ν.

Civil Action

LONE PINE CORPORATION, et als.,

NOTICE OF MOTION TO DISMISS COMPLAINT AS TO

Defendants.

DEFENDANTS MONMOUTH COUNTY BRIDGE, HIGHWAY AND PARKS DEPARTMENTS AND MONMOUTH COUNTY SHADE TREE COMMISSION

TO: Shamy & Luke, Esqs.
Attorneys for Plaintiffs

SIRS: PLEASE TAKE NOTICE that on Friday, August 2, 1985, at 9:00 a.m. or as soon thereafter as counsel may be heard, I shall apply before such Judge as is hearing Superior Court motions at the Monmouth County Court House, Freehold, New Jersey, for an Order Dismissing the Complaint of the plaintiffs as to defendants Monmouth County Bridge Department, Monmouth County Highway Department, Monmouth County Parks Department and Monmouth County Shade Tree Commission upon the grounds that the plaintiffs have failed to file a Notice of Claim as to these defendants as

required by the New Jersey Tort Claims Act, N.J.S.A. 59,
Chapter 8. Upon the argument of this motion, I shall rely upon the annexed Affidavit, the Brief previously submitted on a similar motion by defendant Township of East Brunswick, and the case of Marczewski v. Nowicki, 188 N. J. Super. 355
(App.Div. 1982), and pursuant to Rule 1:6-2, I request that this motion be determined upon the papers submitted, unless there is opposition, and enclose an original and two copies of a proposed Order. In the event of opposition, I request oral argument.

SACHS & SACHS

Attorneys for Defendants Melody,
Rash, Shaw, Truncer, Monmouth
County Bridge, Highway and
Parks Departments, and Monmouth
County Shade Tree Commission

Bv:

DOBEDT A SACHS

Dated: July 19, 1985

cc: Busch & Busch, Esqs.

CERTIFICATE OF SERVICE

to them by Certified () I certify that this p time permitted by Rule () I certify that this p time permitted by Rule	of the within pleading was wing persons by mailing same Mail, R.R.R., on
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() I certify that this p time permitted by Rule	
cime permitted by Ruic	leading was served within the e 4:6.
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() As acknowledged	as within time.
() As permitted by	Court Order.
has been filed with the	iginal of the within pleading he Superior Court Clerk, and reof has been filed with the delow:
(X) Monmouth County	Clerk
() Middlesex County	y Clerk
() Ocean County Cle	erk
()	County Clerk
()	

SACHS & SACHS
Attorneys for Various Defendants

By:

Robert A Sachs

2 1985

SUPERIOR COURT OF N.J. PAID

TANK VI A SISH I SESAMBE SEDENGERM

JUL 25 1985

REC'D. & FILED SUPERIOR COURT OF NEW JERSEY

M.V. 29 JOHN M. MAYSON CLERIG

SACHS & SACHS

45 E. Main St. (P.O. Box 394)

Holmdel, N.J. 07733

(201) 946-4620

Attorneys for Defendants Melody, Rash, Shaw and Truncer

· 2018年1日,1940年4月2日 - 12 編集機工者基準機構

SUPERIOR COURT OF NEW JERSEY JOSEPH LORE, et als., LAW DIVISION - MONMOUTH COUNTY

Plaintiffs.

DOCKET NO. L-033606-85

v.

LONE PINE CORPORATION, et als.

Civil Action

Defendants.

ANSWER, CROSSCLAIM, ANSWER TO CROSSCLAIMS, DEMAND FOR STATEMENT OF DAMAGES AND JURY DEMAND

Defendants Eugene Melody, Harry Rash (incorrectly impleaded as Harry W. Rosh) and David Shaw, having their place of business in Freehold, New Jersey and defendant James J. Truncer, having his place of business in Middletown, New Jersey, by way of Answer to the Complaint of the plaintiffs, say:

FIRST COUNT

- 1. They have no knowledge or information sufficient to form a belief as to the allegations of paragraph 1.
- 2-9. They do not answer the allegations of paragraphs 2 through 9 inasmuch as same do not refer to them.

4 2 4

- 10-12. They deny those allegations of paragraphs 10 through 12 as may be considered to refer to them; they do not answer the remaining allegations of paragraphs 10 through 12.
- 13. They deny the allegations of those portions of paragraph 13 which refer to them and do not answer the remaining allegations of paragraph 13 inasmuch as same do not refer to them.

SECOND COUNT

- They repeat their answers to the allegations of the First Count as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the ownership of the property in question, and they deny the remaining allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

THIRD COUNT

- They repeat their answers to the allegations of the First Count as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the ownership of the property mentioned, and deny the remaining allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

FOURTH COUNT

- They repeat their answers to the allegations of the First Count as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the ownership of the property mentioned, and deny the remaining allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

FIFTH COUNT

- 1. They have no knowledge or information sufficient to form a belief as to the allegations of paragraph 1.
- 2. They have no knowledge or information sufficient to form a belief as to the allegations of paragraph 2.
- 3. They repeat their answers to the allegations as set forth above.
- 4. They have no knowledge or information sufficient to form a belief as to the allegations of paragraph 4.
 - 5. They deny the allegations of paragraph 5.

SIXTH COUNT

- 1. They repeat their answers to the allegations of the First Count as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the ownership of the property mentioned, and deny the remaining allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

SEVENTH COUNT

- 1. They repeat their answers to the allegations of the First and Sixth Counts as if set forth at length.
 - 2. They deny the allegations of paragraph 2.
 - They deny the allegations of paragraph 3.

EIGHTH COUNT

- 1. They repeat their answers to the allegations of the First, Sixth and Seventh Counts as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

NINTH COUNT

- 1. They repeat their answers to the allegations set forth above as if set forth at length.
 - They deny the allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

TENTH COUNT

- 1. They repeat their answers to the allegations set forth above, as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the allegations of paragraph 2.

3. They deny the allegations of paragraph 3.

ELEVENTH COUNT

- They repeat their answers to the allegations set forth above, as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the ownership of the property in question, and deny the remaining allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

TWELFTH COUNT

- 1. They repeat their answers to the allegations set forth above, as if set forth at length.
 - 2. They deny the allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

THIRTEENTH COUNT

- 1. They repeat their answers to the allegations set forth above, as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the allegations of paragraph 2.

3. They deny the allegations of paragraph 3.

FOURTEENTH COUNT

- 1. They repeat their answers to the allegations set forth above, as if set forth at length.
 - 2. They deny the allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

FIFTEENTH COUNT

- 1. They repeat their answers to the allegations set forth above, as if set forth at length.
 - 2. They deny the allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

SIXTEENTH COUNT

- 1. They repeat their answers to the allegations set forth above, as if set forth at length.
- 2. They have no knowledge or information sufficient to form a belief as to the ownership of the property in question, and deny the remaining allegations of paragraph 2.
 - 3. They deny the allegations of paragraph 3.

FIRST DEFENSE

These defendants were not negligent and they violated no duty which they owed to the plaintiffs.

SECOND DEFENSE

Without admitting any negligence on their part, these defendants say that if, in fact, such negligence is found, then the claims asserted against them are barred or; in the alternative, the recoverable damages are reduced, by reason of the Comparative Negligence Act, N.J.S.A. 2A:15-5.1, et seq., and the Tort Claims Act, N.J.S.A. 59:9-4.

THIRD DEFENSE

The damages sustained, if any, resulted from the negligence or acts of third persons over whom these defendants had no control.

FOURTH DEFENSE

Plaintiffs have failed to file a Notice of Claim or otherwise comply with the Notice provisions of the New Jersey Tort Claims Act, and the Complaint should therefore be dismissed.

FIFTH DEFENSE

The claims of the plaintiffs are barred by reason of the Statute of Limitations, N.J.S.A. 2A:14-2, et seq. and N.J.S.A. 59:8-8.

SIXTH DEFENSE

The claims of the plaintiffs against these defendants are barred by reason of the New Jersey Tort Claims Act, N.J.S.A. Title 59.

SEVENTH DEFENSE

These defendants are entitled to all limitations, setoffs and other provisions of the Tort Claims Act, N.J.S.A. Title 59.

CROSSCLAIM FOR INDEMNIFICATION

These defendants demand indemnification from all parties or entities which hauled, transported, stored or otherwise acted with respect to any substances which may have at any time been in the possession of these defendants.

CROSSCLAIM FOR CONTRIBUTION

These defendants demand contribution from all other defendants pursuant to the New Jersey Joint Tortfeasors' Contribution Act, N.J.S.A. 2A:53A-1, et seq., the Comparative Negligence Act, N.J.S.A. 2A:15-15.1, et seq., and the Tort Claims Act, N.J.S.A. 59:9-3, et seq.

ANSWER TO CROSSCLAIMS

These defendants, by way of Answer to any Crossclaims which have been or may be filed against them, say:

1. They deny the allegations of the Crossclaims, and further deny that any other party is entitled to indemnification or contribution from them.

DEMAND FOR STATEMENT OF DAMAGES

Pursuant to Rule 4:5-2, these defendants demand that the plaintiff furnish a written statement of the amount of damages claimed within five (5) days.

JURY DEMAND

These defendants demand trial by a jury of twelve (12) persons.

SACHS & SACHS

Attorneys for Defendants Melody,

Rash Shaw and Truncer

By:

CORDERT A SACHS

Dated: July 24, 1985

CERTIFICATE OF SERVICE

(x)	I certify that a copy of the within pleading was served upon all attorneys in the within matter by mailing same to them by United States Mail, on July 24, 1985. ************************************
()	I certify that a copy of the within pleading was served upon the following persons by mailing same to them by Certified Mail, R.R.R., on
()	I certify that this pleading was served within the time permitted by Rule 4:6.
(X)	I certify that this pleading was served within the time permitted by Rule 4:6,
	(X) As extended by Extension of Time.
	() As acknowledged as within time.
	() As permitted by Court Order.
()	I certify that the original of the within pleading has been filed with the Superior Court Clerk, and that a clear copy thereof has been filed with the County Clerk indicated below:
	() Monmouth County Clerk
	() Middlesex County Clerk
	() Ocean County Clerk
()	() County Clerk

SACHS & SACHS
Attorneys for pefts. Melony, Rash, Shaw & Truncer

Robert A. Sach

44000.01-28BF

ベロレビ|Vヒリ: MONMOUTH COUNTY

JUL 2 3 1985

JAINE W. CLAYTON County Clerk

COURT OF N. REC'D+Q AUG 6 1985 J-21 JOHN M. MAYSON - CLERK

FILED

JUL 2 9 1985

MARSHALL SELINOFF, J.S.C.

216 HADDON AVENUE, SUITE 750 WESTMONT, NEW JERSEY 08108 (609) 858-7200 ATTORNEYS FOR Deft. Englishtown Auction Sales

SLIMM, DASH and GOLDBERG

Plaintiff JOSEPH V. LORE, et als

SUPERIOR COURT OF NEW JERSEY LAW DIVISION MONMOUTH COUNTY

Docket No. L-033606-85

vs.

LONE PINE CORPORATION, et als Defendant

CONSENT ORDER EXTENDING TIME TO ANSWER

This matter having been brought before the Court on application of Slimm, Dash & Goldberg, attorneys for defendant, and it appearing to the Court that there is good cause;

IT IS on this Lyd day of fully , 1985 ORDERED that the time within which defendant is permitted to serve and file an Answer be and hereby is extended twenty (20) days from the date hereof.

Marchall falin

We consent to the form and entry of the within Order. SHAMY & LUKE

Shamy, Jr.

REC'D. & FLED
SUPERIOR COURT OF N.J.
PAID

OCT 25 1985

REC'D. & FLED
SUPERIOR COURLAW UNIT

OCT 22 1985

M.V. 22 A/ M.V. 22 A/ CLERK

JUNY

McKENNA, LISKA & LEONE, P.C. 241 Maple Avenue Post Office Box 778 Red Bank, New Jersey 07701 (201) 741-6681 Attorneys for Defendants

Plaintiff

JOSEPH V. LORE, et al.

vs.

SUPERIOR COURT OF NEW JERSEY MONMOUTH COUNTY LAW DIVISION

Docket No. L-033606-85

Defendant

LONE PINE CORPORATION, et al.

CIVIL ACTION

ANSWER

W.B.

The defendant, Walter Brand, Jr., residing at 11 Grant Street, in the Borough of Farmingdale, County of Monmouth and State of New Jersey, by way of Answer to the Complaint says:

- 1. He admits the allegations contained in paragraph 1 of the First Count only to the extent that he admits that he is a resident of the State of New Jersey.
- 2. He is without knowledge or information sufficient to form a belief as to the truth of paragraph 2 contained in the First Count of the Complaint.

- 3. He is without knowledge or information sufficient to form a belief as to the truth of paragraph 3 contained in the First Count of the Complaint.
- 4. He is without knowledge or information sufficient to form a belief as to the truth of paragraph 4 contained in the First Count of the Complaint.
- 5. He denies the allegations contained in paragraph 5 of the First Count of the Complaint as those allegations might apply to him.
- 6. He denies the allegations contained in paragraph 6 of the First Count of the Complaint as those allegations might apply to him.
- 7. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 7, 8, 9, 10 and 11 contained in the First Count of the Complaint.
- 8. He denies the allegations contained in paragraph 12 of the First Count of the Complaint.
- 9. He denies the allegations contained in paragraphs 13(o-1) of the First Count of the Complaint, and is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 13 of the First Count of the Complaint.
- 10. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Second Count of the Complaint.

- 11. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Third Count of the Complaint.
- 12. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Fourth Count of the Complaint.
- 13. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Fifth Count of the Complaint.
- 14. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Sixth Count of the Complaint.
- 15. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Seventh Count of the Complaint.
- 16. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Eighth Count of the Complaint.
- 17. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Ninth Count of the Complaint.
- 18. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Tenth Count of the Complaint.

- 19. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Eleventh Count of the Complaint.
- 20. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Twelfth Count of the Complaint.
- 21. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Thirteenth Count of the Complaint.
- 22. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Fourteenth Count of the Complaint.
- 23. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Fifteenth Count of the Complaint.
- 24. He is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Sixteenth Count of the Complaint.

FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state a claim upon which relief can be granted as against the answering defendant.

SECOND AFFIRMATIVE DEFENSE

The Complaint is barred by the equitable defense of laches.

THIRD AFFIRMATIVE DEFENSE

The Complaint is barred by the Statute of Limitations provisions set forth in N.J.S.A. 2A:14-1 et. seq.

FOURTH AFFIRMATIVE DEFENSE

The Complaint is barred by the equitable doctrine of estoppel. WHEREFORE, the defendants demand judgment against plaintiffs:

- A. Dismissing the Complaint;
- B. For reasonable attorney's fees and costs of suit;
- C. For such other and further relief as the Court may deem equitable and just.

MCKENNA, LISKA & LEONE Attorneys for Defendants

BY: CLIANT A. HOPKINS

Dated: October 18, 1985

JURY DEMAND

Defendant, Walter Brand, Jr., hereby demands a trial by jury as to each and every issue.

MCKENNA, LISKA & LEONE Attorneys for Defendants

ELIZABETH A. HOPKINS

Dated: October 18, 1985

CERTIFICATION

I hereby certify that the copy of the within Answer and Affirmative Defenses has been filed with the Clerk of the Superior Court of New Jersey, in Trenton, within the time prescribed by the Rules of the Court and further certify that a copy of the same has been served upon George J. Shamy, Jr., Esq., attorney for plaintiffs, 178 Livingston Avenue, New Brunswick, New Jersey 08901, by certified mail, on a duly stamped addressed envelope.

Dated: October 18,1985