

Alexa D'Amato Barrera, Esquire
D'Amato Law Firm
2900 Fire Road, Suite 200
Egg Harbor Township, New Jersey 08234
609-926-3300
Attorney for Plaintiffs

**AARON D. KIZER-GOFF AND JENNIFER
L. SPAHR, AS ADMINISTRATORS AD
PROSEQUENDUM FOR THEIR MINOR
CHILD, LANDON GOFF,**

Plaintiffs,

-vs-

**SHEPPARD BUS SERVICES, INC., JOHN
DOE, MARY DOE, ABC PARTNERSHIPS
and XYZ CORPORATIONS,**

Defendants

SUPERIOR COURT OF NEW JERSEY
ATLANTIC COUNTY - LAW DIVISION

DOCKET NUMBER: ATL-L-

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiffs, Aaron D. Kizer-Goff and Jennifer L. Spahr, as Administrators Ad
Prosequendum for their minor child, Landon Goff, residing in Galloway, Atlantic
County, New Jersey, by way of Complaint and Jury Demand say:

FIRST COUNT

1. On December 1, 2022, Landon Goff, (hereinafter referred to as
"Landon"), was a passenger on a school bus owned by Defendant, Sheppard Bus
Services, Inc., being transported to Cape May County Special Services School.

2. At the aforesaid place and time Defendant, Sheppard Bus Services,
Inc. (hereinafter referred to as "Defendant Sheppard"), had a business address of
35 Rockville Road, Bridgeton, Cumberland County, New Jersey.

3. Defendant Sheppard operates 500 vehicles in 5 New Jersey Counties.
Defendant Sheppard Website was and is <http://sheppardbus.com/school/services/>.
See Exhibit "A".

4. Defendant Sheppard is a school bus contractor that provides student
transportation to various school districts.

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

5. At the aforesaid place and time Defendant Sheppard's employees, (bus driver and aide), were operating and/or attending to the students on the school bus registered in the name of Sheppard Bus Services for their benefit and that of Sheppard Bus Services, Inc., John Doe, Mary Doe, ABC Partnerships and XYZ Corporations.

6. At all times, Defendant Sheppard was required to properly train all bus drivers and school bus aides pursuant to N.J.A.C. 6A:27-11.3; N.J.S.A. 18A:39-19.2. See Exhibit "B".

7. The New Jersey training program from the NJ Commissioner of Education, demanded at a minimum that bus driver and bus aide training must include: (1) student management and discipline; (2) school bus accident and emergency procedures; (3) conducting school bus emergency exit drills; (4) loading and unloading procedures; (5) school bus stop loading zone safety. See N.J.A.C. 6A:27-11.3. See Exhibit "C".

8. The New Jersey State training program relative to students with special needs for school bus drivers and school bus aides requires that it shall include: a. appropriate behavior management; b. effective communication; c. use and operation of adaptive equipment; and d. understanding behaviors that may be related to specific disabilities. See N.J.S.A. 18A:39-19.2. See Exhibit "D".

9. Moreover, the training program from the New Jersey Commissioner of Education was available to school bus contractors, including Defendant Sheppard, providing pupil transportation services under contract with boards of education. See N.J.S.A. 18A:39-19.2. See Exhibit "D".

10. In addition to the school bus driver and aide training for interacting with students with special needs, school bus drivers and school bus aides who transport special needs students, or drivers who may substitute on a route transporting special needs students, were required to be trained in the special needs

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

of the students on board that route. See N.J.S.A. 18A:39-19.2; N.J.A.C. 6A:27-11.3. See Exhibits "B" and "D".

11. New Jersey's Administrative Code requires that if a student's medical condition could change or be impacted by anything during the ride, the school bus driver and aide should be made aware of this and be trained in both recognizing this change and what needs to be done, if anything, in reaction to this change. See N.J.A.C. 6A:27-12.1. See Exhibit "E".

12. On December 1, 2022, Landon was a handicapped minor with special needs and in a wheelchair. See Exhibit "F".

13. On December 1, 2022, the Defendant Sheppard's bus that Landon was on had 4 students.

14. The bus driver was Landon's regular bus driver and was familiar with Landon.

15. The bus aide was a substitute aide filling in for the regularly scheduled bus aide.

16. Landon was picked up from his home on December 1, 2022 at approximately 8 a.m.

17. On December 1, 2022, Landon lived in Galloway Township, Atlantic County, New Jersey 08205.

18. Cape May Special Services School is located at 148 Crest Haven Road, Cape May Courthouse, New Jersey 08210. See Exhibit "G", (Cape May County Special Services School District Mission Statement).

19. Landon was to arrive at Cape May Special Services School at 9 a.m. but was several minutes late.

20. Due to medical issues and to limit the amount of time on the bus, Landon was to be the last student picked up on the way to school and the first student to be dropped off on the way home from school.

The logo for D'AMATO LAW FIRM features a large, stylized letter 'D' in a serif font. To the right of the 'D', the words 'D'AMATO' and 'LAW FIRM' are stacked vertically in a smaller, all-caps serif font.

**D'AMATO
LAW FIRM**

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

21. Defendant Sheppard's bus was equipped with an audio/video recording system. See Exhibit "A".

22. Defendant Sheppard's bus was equipped with a radio communication system allowing communication at all times with the bus terminal and the school.

23. During the transport on Defendant Sheppard's bus, Landon became unconscious.

24. At no time during the approximately 44-minute transport did the bus driver or bus aide make any radio communication or any other communication to anyone to alert them of Landon's condition.

25. At 9:07 a.m., after the bus arrived at school, School Resource Officer Andrew Yhlen was alerted by a radio transmission on his school radio that there was a student on the school bus that was unconscious and unresponsive.

26. School personnel attempted to render aid and CPR to Landon.

27. No aide was rendered by Defendant Sheppard's bus driver or bus aide either during the transport or after arrival.

28. Landon was transported by ambulance to Cape Regional Medical Center.

29. Landon did not recover and died on December 4, 2022.

30. Cause of death was determined to be Hypoxic Brain Injury and Upper airway obstruction.

31. Investigation revealed that the audio/video recording system had malfunctioned and was not operating on December 1, 2022.

32. Plaintiffs allege that an insufficient amount of time has passed within which to determine the identity of any other persons or business entities that may be responsible for Landon's death. Said persons and business entities have been named as John Doe, Mary Doe, ABC Partnerships and XYZ Corporations. Plaintiffs



COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2800 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

reserve the right to amend the Complaint when and if their identities become known.

33. At the aforesaid time and place, the injury, loss, and harm suffered by Landon was the result of Defendant Sheppard's acts and omissions. Specifically, Defendant Sheppard acted with willful and wanton disregard of Landon's rights when Defendant Sheppard's employees (bus driver and bus aide) caused Landon to pass away from asphyxiation. This conduct was a deliberate act or omission with knowledge of a high degree of probability of harm to Landon which was foreseeable that he might be harmed by that act or omission and reckless indifference.

34. Defendant Sheppard and its employees, (bus driver and aide) acted negligently and with willful and wanton disregard of Landon's rights when Defendant Sheppard's employees caused Landon to pass away from asphyxiation.

35. On January 23, 2023, Aaron D. Kizer-Goff and Jennifer L. Spahr, Co-Administrators Ad Prosequendum for their minor child Landon, were appointed by the Atlantic County Surrogate's Court as the Co-Administrators Ad Prosequendum of the Estate of Landon Goff.

WHEREFORE, Plaintiffs demand judgment against Defendants for damages, interest and costs of suit pursuant to the survivor and wrongful death statutes of the State of New Jersey.

SECOND COUNT

1. Plaintiffs repeat the allegations of the previous Counts.
2. Throughout the transport, due to Defendant Sheppard's negligence and willful and wanton disregard of Landon's rights, until his death, Landon experienced pain, suffering, and loss of enjoyment of life.

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2000 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

3. Aaron D. Kizer-Goff and Jennifer L. Spahr are the surviving parents of the aforesaid decedent and are now deprived of the loss of the decedent's companionship.

WHEREFORE, Plaintiffs demand judgment against Defendants for damages, interest and costs of suit pursuant to the survivor and wrongful death statutes of the State of New Jersey.

THIRD COUNT

1. Plaintiffs repeat the allegations of the previous Counts.

2. Defendant Sheppard, was negligent in the hiring and retention of Defendant's bus driver and bus aide for a position that they knew or should have known that the employees were not qualified for and/or for failing to properly supervise or direct Defendant's employees.

3. Defendant Sheppard failed to exercise due care in hiring Defendant's employees by making a proper inquiry into the employees' backgrounds before being hired.

4. Defendant Sheppard was negligent in the hiring and retention of employee Defendant's employees as they were unfit for the task assigned.

5. The aforesaid death of Landon was caused by the negligence and carelessness of Defendant Sheppard in its hiring, failing to adequately train, and/or supervising of its employees.

6. Defendant Sheppard by and through its agents, servants, employees and representatives, upon knowledge of the existence of the dangerous or otherwise unsafe training of Defendant's employees had a duty to terminate Defendant's employees.

7. Defendant Sheppard, by and through its agents, servants, employees and representatives, upon knowledge of the existence of the dangerous

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2000 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

or otherwise untrained Defendant's employees had a duty to warn Plaintiffs of the existence of the dangerous or otherwise untrained employees.

8. The aforesaid actions and/or omissions of its employees (bus driver and bus aide) and Defendant Sheppard by and through its agents, servants, employees and/or representatives, constitute negligence pursuant to N.J.S.A. 59:3-1.

9. The aforesaid death of Landon was proximately caused by the negligence of Defendant Sheppard and its employees (bus driver and bus aide).

10. As a result of the aforesaid negligence, Plaintiffs suffered injuries resulting in the death of their son and were caused pain and emotional suffering.

WHEREFORE, Plaintiffs demand judgment against Defendants for damages, interest and costs of suit pursuant to the survivor and wrongful death statutes of the State of New Jersey.

FOURTH COUNT

1. Plaintiffs repeat the allegations of the previous Counts.

2. At the aforesaid time and place, Defendant's employees, (bus driver and aide), acted with a wanton and willful disregard of the safety and well-being of decedent, Landon, as Defendant's employees were distracted and/or pre-occupied or otherwise ignored Landon, causing the death of Landon.

3. Defendant Sheppard's employees, (bus driver and aide) acted with willful and wanton disregard of Landon's rights when Defendant Sheppard's employees caused Landon to pass away from asphyxiation. This conduct was a deliberate act or omission with knowledge of a high degree of probability of harm to another who foreseeably might be harmed by that act or omission and reckless indifference to the consequence of the act or omission.

3. As a result of the aforesaid actions, Plaintiffs suffered injuries resulting in the death of their son and were caused pain and suffering.

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

WHEREFORE, Plaintiffs demand judgment against Defendants for punitive damages, attorneys fees, interest and costs of suit.

JURY DEMAND

Plaintiffs demand a jury trial.

REQUEST FOR INSURANCE INFORMATION

In accordance with the Rules governing the Courts of the State of New Jersey, and in particular, R.4:10-2(b), you are hereby demanded and required to supply the information listed below. If you do not supply the information requested within twenty (20) days, you will be subject to sanctions and attorney's fees as provided for in the Rules of Court.

1. Name and address of insurance carrier;
2. Policy number;
3. Existence of any excess or umbrella coverage including the name of the carrier and policy number;
4. Policy Limits for primary and/or excess coverage;
 - (a) Liability Insurance;
 - (b) Property damage and/or Bodily Injury;
 - (c) Homeowners;
 - (d) Other.
5. Name and address of insurance broker.
6. Any and all policies of insurance which are available to answer for the damages of the Plaintiff claimed herein. Please provide all of the above information with respect to all such policies.

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

NOTICE OF TRIAL COUNSEL

Alexa D'Amato Barrera, Esquire is designated as Trial Counsel pursuant to Rule 4:25-4.

D'AMATO LAW FIRM

BY: 
Alexa D'Amato Barrera, Esquire

DATED: December 1, 2023

CERTIFICATION

Alexa D'Amato Barrera, Esquire, of full age, certifies:

1. I am a member of the D'Amato Law Firm and am entrusted with the preparation and trial of this case.
2. This case is not subject to any other court action or arbitration proceeding.

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


Alexa D'Amato Barrera, Esquire

DATED: December 1, 2023

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)

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


Alexa D'Amato Barrera, Esquire

DATED: December 1, 2023

**D'AMATO
LAW FIRM**

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

ADMINISTRATORS AD PROSEQUENDUM CERTIFICATION

I hereby certify that Aaron D. Kizer-Goff and Jennifer L. Spahr are the Administrators Ad Prosequendum for their minor child the minor Plaintiff, Landon Goff, that said Administrators do not have any interest contrary to that of the infant, and has consented to act as the Administrators Ad Prosequendum.

D'AMATO LAW FIRM

By:



Alexa D'Amato Barrera, Esquire

DATED: December 1, 2023

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2000 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

EXHIBIT "A"


D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

856-765-3812

SCHOOL BUS SERVICES

Need bus transportation? Sheppard Bus Service operates over 500 vehicles in five New Jersey counties.

SCHOOL BUS SERVICES

- Late Model Inventory
- GPS and Video Surveillance
- One stop provider for school bus rental or lease, vehicle sales & service

Over the past 65 years, from the days of narrow two-lane roads and neighborhood schools to the modern era of interstate highways and GPS-guided vehicles, Sheppard Bus Service has been meeting the transportation needs of our clients.

When you rent from Sheppard Bus Service, you get more than just bus transportation – you get the team of knowledgeable, experienced people. Our staff wants to provide our customers with a memorable event and hassle-free transportation experience.

Sales & Leasing »

EXHIBIT "B"


**D'AMATO
LAW FIRM**

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234



School Finance

- [School Finance Home](#)
- [Accounting and Financial Reporting](#)
- [Accounting and Fiscal Guidance](#)
- [Annual School District Budget](#)
- [Community Eligibility Provision \(CEP\) Information](#)
- [Data Submission and Information](#)
- [Indirect Cost Rate](#)
- [Nonpublic School Services](#)
- [Private Schools for Students with Disabilities](#)
- [State Aid, Funding Formula & Payments](#)
- [Student Transportation](#)
- [Taxpayers' Guide to Education Spending \(TGES\)](#)
- [About School Finance/Contact Us](#)

Student Transportation

School Bus Driver and Aide Training for Interacting with Students with Special Needs



- [En español](#)

In accordance with NJSA 18A:39-19.2, the New Jersey Department of Education has developed a training program for school bus drivers and school bus aides on appropriate procedures for interacting with students with special needs. Employers of school bus drivers and bus aides in New Jersey are required to ensure the drivers/aides view this training video on proper procedures for interacting with students with special needs.

School Bus Driver and Aide Training for Interactin...

Watch later
 Share

Some Examples of Communication Devices for Non-Verbal Students

School Bus Driver and Aide Training for Interacting with Students with Special Needs

N.J.S.A.18A:39-19.2

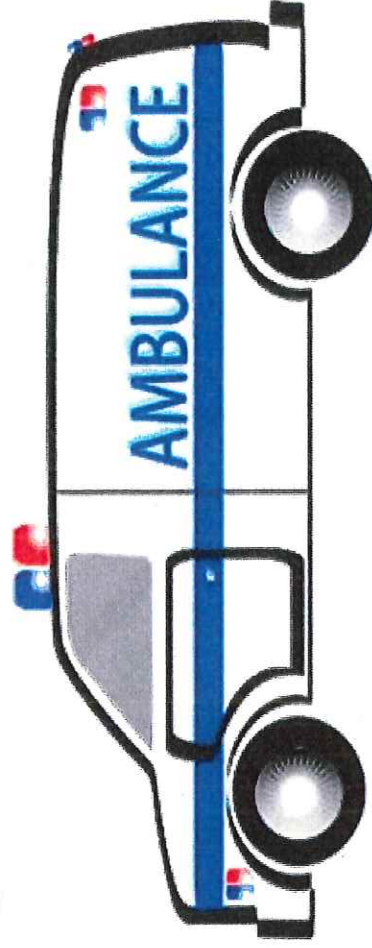
Prepared in collaboration with the New Jersey Joint Council of County Special Services School Districts
September 2016

0:01 / 27:57



Student Medical Emergencies

- Pull over and call 911;
- Stay calm and track time;
- Check for medical bracelet;
- Protect student from possible hazards (sharp objects, etc.);
- Stay with the student during the emergency;
- Provide emotional support; and
- Document the incident.



23:28 / 27:57



Prepared in collaboration with



EXHIBIT "C"


D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2000 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

- (b) School bus drivers and bus aides shall participate in the emergency exit drills.
- (c) Drills shall be documented in the minutes of the first district board of education meeting following the completion of each emergency exit drill. The minutes shall include, but shall not be limited to, the following:
 - 1. The date of the drill;
 - 2. The time the drill was conducted;
 - 3. The school name;
 - 4. The location of the drill;
 - 5. The route number(s) included in the drill; and
 - 6. The name of the school principal or assigned person(s) who supervised the drill.

6A:27-11.3 Training

- (a) Employers shall ensure that all school bus drivers and school bus aides are properly trained for the functions of their positions.
- (b) Employers shall administer a safety education program for all permanent and substitute drivers and aides twice per calendar year. At a minimum, the training shall include:
 - 1. Student management and discipline;
 - 2. School bus accident and emergency procedures;
 - 3. Conducting school bus emergency exit drills;
 - 4. Loading and unloading procedures;
 - 5. School bus stop loading zone safety;
 - 6. Inspecting the school vehicle for students left on board at the end of a route; and
 - 7. The use of a student's education records, including the employee's responsibility to ensure the privacy of the student and his or her records, if applicable.

- (c) In addition to the training requirements in (b) above, employers shall administer to school bus drivers a safety education program that includes defensive driving techniques and railroad crossing procedures.
- (d) For all school bus drivers and school bus aides that it employs, an employer shall administer a training program for interacting with students with disabilities as developed by the Commissioner pursuant to N.J.S.A. 18A:39-19.2 and 19.3. The employer shall administer the training program to each employee prior to allowing him or her to operate a school bus or serve as a school bus aide.
1. An employer shall require a school bus driver or school bus aide to file a certification with the employer that the individual has completed the training program within five business days of its completion. The employer shall retain a copy of the certification for the duration of the individual's employment, and shall forward a copy of the certification to the executive county superintendent with the annual school bus driver and aide certifications.

6A:27-11.4 Student safety education

At least once each school year, district boards of education shall provide to public school students a safety education program that includes pedestrian safety and rules for riding the school bus.

6A:27-11.5 Student list for school-sponsored activities

Each district board of education may develop and implement a policy requiring the compilation of a list of the names of students being transported by a school bus to a school-sponsored activity, including, but not limited to, field trips or interscholastic sports programs. Any policy pursuant to this section shall require the individual creating the list of students for each school

EXHIBIT "D"

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

Search all cases and statutes...

JX

Statutes, codes, and regulations / New Jersey Statutes
/ Title 18A - EDUCATI... / Chapter 18A:39 - TR...
/ Section 18A:39-19.2...

N.J. Stat. § 18A:39-19.2

Current through L. 2023, c. 96.

Section 18A:39-19.2 - Training program for school bus drivers, bus aides relative to students with special needs

The Commissioner of Education shall develop a training program for school bus drivers and school bus aides on proper procedures for interacting with students with special needs. The training program shall include, but need not be limited to, the following:

- a. appropriate behavior management;
- b. effective communication;
- c. use and operation of adaptive equipment; and
- d. understanding behaviors that may be related to specific disabilities.

The commissioner shall make the training program available to boards of education and school bus contractors providing pupil transportation services under contract with boards of education no later than one year following the effective date of this act.

EXHIBIT "E"


D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2000 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

bus to submit it to the school principal, or designee, and the principal, or designee, to maintain the list for use in the case of an emergency.

Subchapter 12. Drivers and Aides

6A:27-12.1 General requirements

- (a) The school bus driver and aide shall be reliable persons of good moral character who possess the qualifications and communication skills necessary to perform the duties of the position.
- (b) Anyone driving a school vehicle used to transport students to and from school and school-related activities shall meet all requirements of N.J.S.A. 18A:6-7.6 through 7.12 and 18A:39-17, 18, 19.1, and 20, and all New Jersey Motor Vehicle Commission (NJMVC) rules governing school bus drivers.
 - 1. The executive county superintendent shall ensure compliance with the requirements in (b) above.
- (c) Any certified mobility assistance vehicle technician authorized by a district board of education, nonpublic school governing body, or State agency to provide mobility assistance vehicle transportation services, pursuant to N.J.S.A. 18A:39-20.1, shall:
 - 1. Furnish to the executive county superintendent a criminal history background check and evidence of a check for the technician's record of alcohol and drug-related motor vehicle violations;
 - 2. Not be required to be licensed or regulated as a school bus driver; and
 - 3. Not be subject to the requirements set forth in N.J.S.A. 18A:39-19.2.
- (d) A driver shall hold a valid commercial driver's license (CDL) with appropriate endorsement(s) for the class and type of vehicle operated, issued by the NJMVC or the state where the driver primarily resides.
- (e) School bus drivers shall wear a properly adjusted and fastened seat belt.

- (f) Employers shall submit to the Department’s Office of Student Protection a school bus driver transmittal form, and shall receive an approval letter from the Office of Student Protection, prior to assigning a newly hired, currently approved school bus driver to a bus route.
- (g) Employers shall retain a current qualifications record for each school bus driver and aide. At a minimum, the retained records shall include:
 - 1. The driver’s and/or aide’s name and Social Security number;
 - 2. The driver’s license number with the class of license, endorsement to operate a school bus, and the issuing state;
 - 3. A current medical examiner’s certificate, if required;
 - 4. The current criminal history background check certification letter; and
 - 5. A copy of the Department’s Office of Student Protection school bus driver transmittal form, if applicable.
- (h) Employers shall notify each school bus driver when reoccurring qualification requirements become due. The requirements shall include, but not be limited to:
 - 1. Driver license renewal;
 - 2. Driver physical; and
 - 3. Criminal history background check.
- (i) Employers shall notify each school bus aide and mobility vehicle assistance technician when the criminal history background check becomes due.
- (j) Within one business day of notification that a school bus driver’s license is suspended or revoked, employers shall verify to the Department’s Office of Student Protection that the driver is no longer operating a school bus.
- (k) The driver shall complete daily a driver’s school bus condition report as prescribed by the NJMVC.

- (l) School bus aides shall meet criminal history background check requirements, pursuant to N.J.S.A. 18A:6-7.1 et seq.
- (m) School bus drivers and aides shall be considered under the Federal Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232 g, to be school officials who have a legitimate educational interest to parts of a student's record relating to transportation, without parental consent.
 - 1. Legitimate educational interest, applicable whenever a school official needs to review an education record to fulfill his or her professional responsibility, is defined for school bus drivers and aides as information needed to receive proper training and ensure informed actions to safely transport the student and any other students on the bus.

6A:27-12.2 Accident reporting

- (a) Every school bus driver shall immediately inform the principal of the receiving school and the school business administrator of the district board of education providing the transportation following an accident that involves an injury, death, or property damage. The driver shall complete and submit the Commissioner-prescribed preliminary school bus accident report to the principal and school business administrator by the end of the first business day after the accident. The driver shall also file, within 10 days of the accident, the completed Commissioner-prescribed preliminary school bus accident report with the Department.
- (b) The district board of education shall also electronically submit the accident information to the Department on the Department-prescribed electronic accident report log.
- (c) In addition to the preliminary school bus accident report, the driver of a school bus involved in an accident resulting in injury or death of any person, or damage to property

EXHIBIT "F"

D
D'AMATO
LAW FIRM

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 209
Egg Harbor Township, NJ 08234

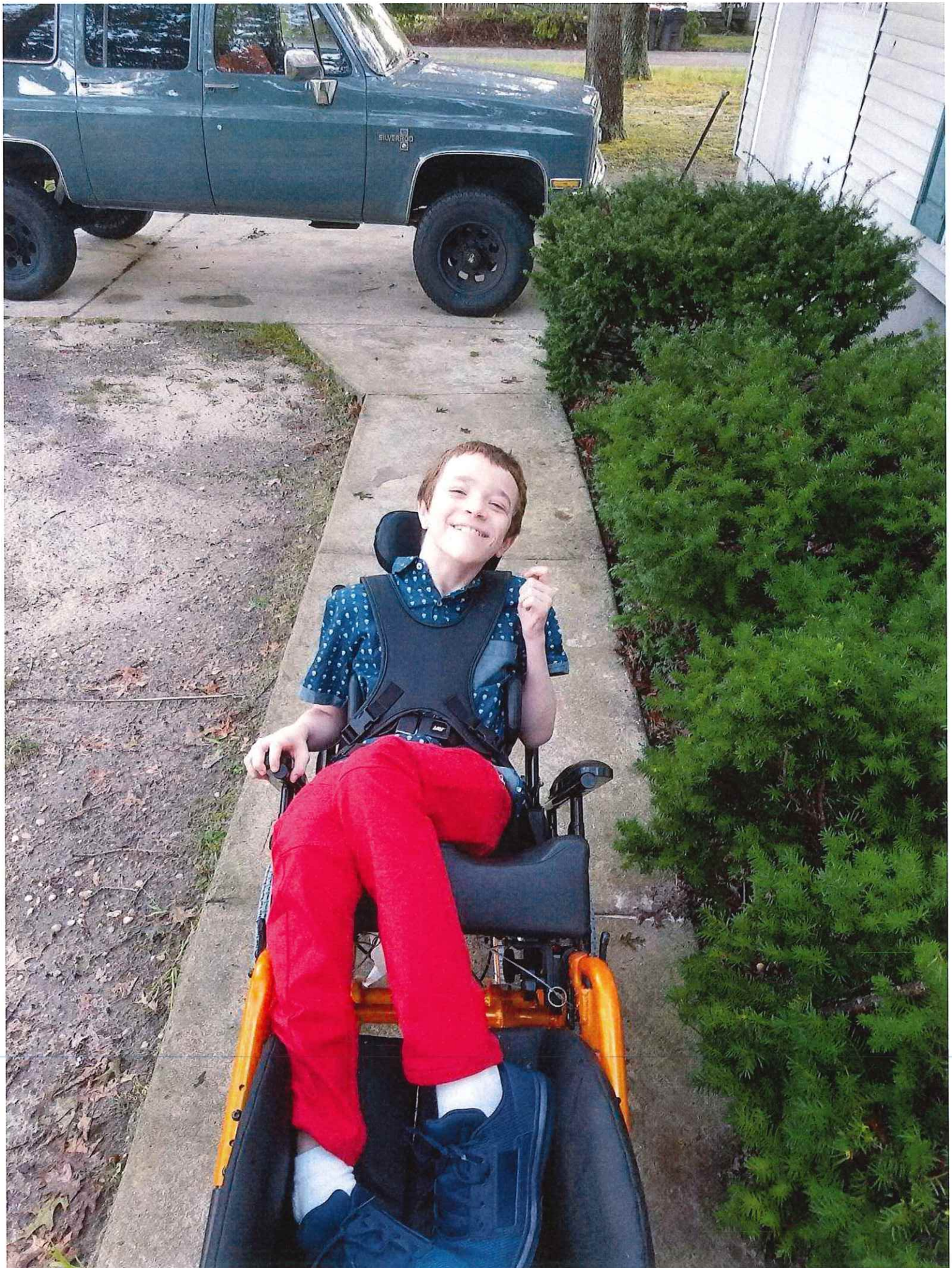




EXHIBIT "G"

D
D'AMATO
LAW FIRM_{LLC}

COUNSELORS AT LAW
A PROFESSIONAL CORPORATION

2900 Fire Road
Suite 200
Egg Harbor Township, NJ 08234

QUICK LINKS

- [Education Foundation](#)
- [2022-2023 CMCSSTD Calendar \(PDF\)](#)
- [2022-2023 CMCSSTD Emergency Virtual or Remote Instruction Plan.pdf \(PDF\)](#)
- [User Friendly Budget 22-23.pdf \(PDF\)](#)
- [Health and Physical Education Curriculum Standards](#)
- [COVID-19 Information](#)
- [Cape May County Traumatic Loss Coalition](#)
- [Virtual Tour](#)
- [Admissions](#)
- [Directions](#)
- [Employment Opportunities](#)
- [H1B](#)
- [Joint Council Of Special Services School Districts](#)
- [Transportation](#)
- [Technology Help Desk](#)
- [CMCSSTD ARP ESSER Use Of Funds \(PDF\)](#)

MISSION STATEMENT

The Cape May County Special Services School District is committed to providing effective educational programs that meet the unique social, emotional, physical, intellectual, and career needs of students with special needs. By providing specialized academic instruction in the New Jersey Core Curriculum Content Standards, vocational and career development, functional life skills and individualized therapeutic intervention, the district will enable each learner to realize his or her highest potential as a contributing member of society.

◀ December 2022 ▶

S	M	T	W	T	F	S
27	28	29	30	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

December 14

No events on calendar today

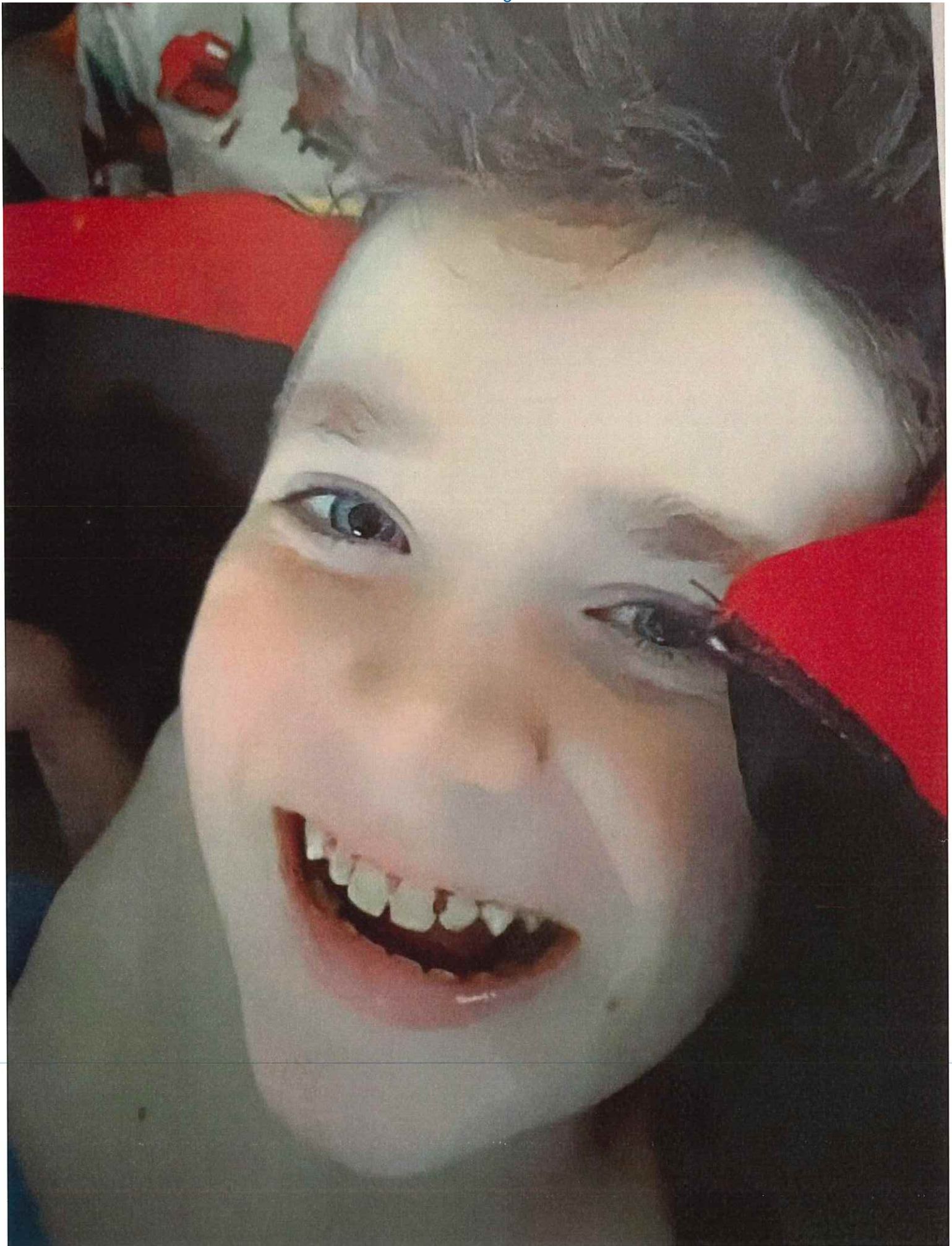
DISTRICT NEWS

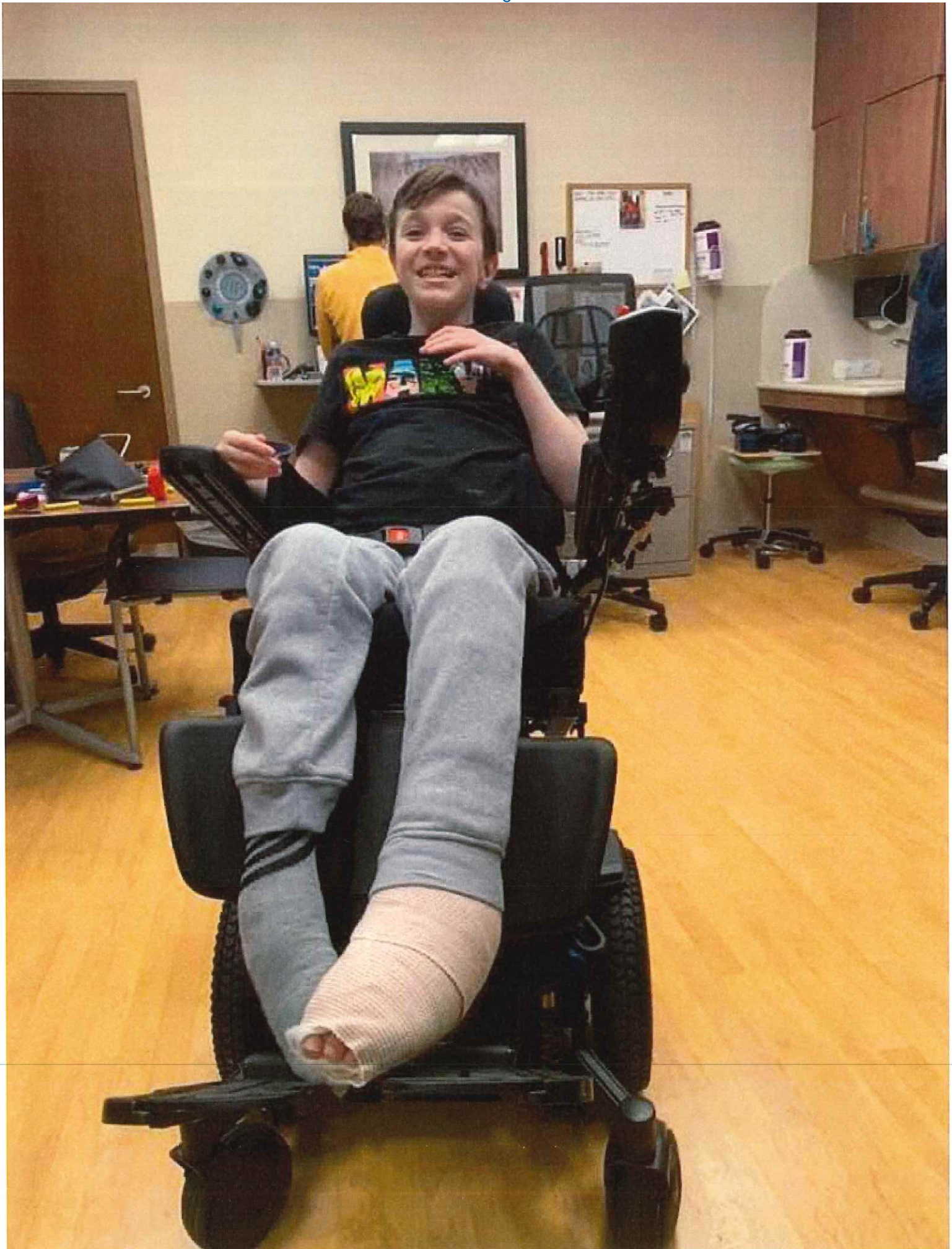
[Join Us For Our Winter Bazaar](#) Posted 12/1/22

[Hanan More than Words](#) Posted 10/17/22

[Wellness Newsletter September, 2022](#) Posted 10/4/22

View All





Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-003140-23

Case Caption: KIZER-GOFF AARON VS SHEPPARD BUS SERVICE S, INC.

Case Initiation Date: 12/01/2023

Attorney Name: ALEXA D'AMATO BARRERA

Firm Name: D'AMATO LAW FIRM, PC

Address: 2900 FIRE RD STE 200
EGG HARBOR TOWNSHIP NJ 08234

Phone: 6099263300

Name of Party: PLAINTIFF : KIZER-GOFF, AARON, D

Name of Defendant's Primary Insurance Company
(if known): NATIONAL INTERSTATE INSURANCE

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

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

Are sexual abuse claims alleged by: AARON D KIZER-GOFF? NO

Are sexual abuse claims alleged by: JENNIFER L SPAHR? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

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

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

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

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

12/01/2023
Dated

/s/ ALEXA D'AMATO BARRERA
Signed

