

UNITED STATES DISTRICT COURT  
for the  
District of New Jersey

LEE KENWORTHY as the  
Administrator for the ESTATE  
OF SHAYLING KENWORTHY AND LEE  
KENWORTHY, Individually,

Plaintiff,

vs.

LYNDHURST POLICE DEPARTMENT,  
OFFICER PHILIP REINA, in his  
individual capacity, LYNDHURST  
CHIEF OF POLICE JAMES  
O'CONNOR, in his individual  
capacity, SERGEANT RICHARD  
PIZZUTI, in his individual  
capacity, LYNDHURST TOWNSHIP  
AMBULANCE SQUAD, TOWNSHIP OF  
LYNDHURST, ROBERT MARTIN, ANN  
MARTIN, RICHARD ANDERSON,  
LAUREN ANDERSON, HOUSING  
AUTHORITY OF BERGEN COUNTY,  
ADAPT PHARMA - Distributor of  
Naloxene,

Defendants.

Civil Action No.: 2:18-CV-  
12822-MCA-CLW

Civil Action

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NOTICE OF MOTION TO DISMISS  
FILED IN LIEU OF AN ANSWER

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To: Lee Kenworthy, Pro Se  
127 Walton Street  
Englewood, New Jersey 07631

and

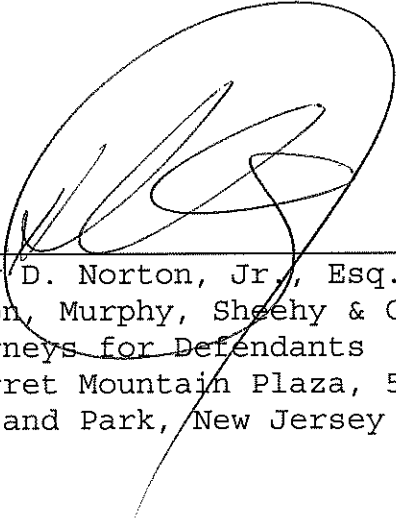
Lee Kenworthy, Pro Se  
72 Constitution Boulevard  
Whiting, New Jersey 08759

SIR/MADAM:

PLEASE TAKE NOTICE that defendants will move before the Honorable Madeline Cox Arleo, Chief United States District Judge, for an Order Dismissing the Plaintiffs' Complaint, with Prejudice.

In support of the motion, defendants will rely on the attached Brief, Statement of Undisputed Material Facts and Certification.

**ORAL ARGUMENT IS REQUESTED.**



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Harry D. Norton, Jr., Esq.  
Norton, Murphy, Sheehy & Corrubia, P.C.  
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Woodland Park, New Jersey 07424

Dated: November 13, 2018