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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF NEW JERSEY AND NEW JERSEY  
CIVIL SERVICE COMMISSION,

Defendants.

Civil Action No. \_\_\_\_\_

**COMPLAINT**

Plaintiff, United States of America, alleges:

1. This action is brought on behalf of the United States to enforce the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*, as amended (“Title VII”).
2. This Court has jurisdiction of this action under 42 U.S.C. § 2000e-6(b), 28 U.S.C.

§§ 1331 and 1343, and 28 U.S.C. § 1345.

3. Defendant State of New Jersey (“New Jersey”) is a person within the meaning of 42 U.S.C. § 2000e(a), and an employer within the meaning of 42 U.S.C. § 2000e(b).

4. Defendant New Jersey Civil Service Commission (“NJCSC”) is a five-member body, each member of which is appointed by the Governor of New Jersey with the consent of the New Jersey Senate.

5. On June 30, 2008, the civil service responsibilities of the former New Jersey Department of Personnel were assumed by the NJCSC. With respect to time periods prior to that date, references to the NJCSC in this Complaint include and incorporate its predecessor, the former New Jersey Department of Personnel.

6. Under state law, the NJCSC is responsible for, *inter alia*, establishing procedures for the promotion of law enforcement officers in municipalities and counties that participate in the New Jersey Civil Service system.

7. Defendant NJCSC is a person within the meaning of 42 U.S.C. § 2000e(a), and an employer within the meaning of 42 U.S.C. § 2000e(b).

8. Since at least 2000, the NJCSC has maintained, and it continues to maintain, selection procedures for promotion to the rank of Police Sergeant. These procedures are utilized by hundreds of New Jersey cities and counties that participate in the New Jersey Civil Service system.

9. Since at least 2000, the NJCSC has administered, and it continues to administer, a written multiple-choice examination as part of its Police Sergeant promotion procedures. At all relevant times, the NJCSC has been, and it continues to be, responsible for setting the minimum

qualifications for admission to the examination, developing and administering the examination, scoring the examination, determining the pass/fail cutoff score that will be used on the examination, establishing Police Sergeant eligibility lists and certifying Police Sergeant candidates to the local jurisdictions participating in the New Jersey Civil Service system.

10. Police officers in local jurisdictions participating in the New Jersey Civil Service system cannot be considered for promotion to the position of Police Sergeant unless they take and pass the written examination administered by the NJCSC. Participating local jurisdictions cannot implement alternative selection procedures, use different written examinations from those administered by the NJCSC, or set different passing scores from those set by the NJCSC.

11. Police Sergeant candidates who meet the minimum qualifications set by the NJCSC and achieve a passing score on the NJCSC's written examination are placed on separate Police Sergeant "eligibility lists" by jurisdiction. On each eligibility list, the candidates are listed in descending rank-order based on their "final scores," which are a combination of their Police Sergeant written examination scores, weighted 80%, and seniority credits, weighted 20%.

12. Local jurisdictions participating in the New Jersey Civil Service system can make promotions to the rank of Police Sergeant only from a "certification list" established by the NJCSC at the request of the local jurisdiction. The NJCSC creates certification lists using the "Rule of Three" pursuant to New Jersey state law, N.J. Stat. Ann., § 11A:4-8. Under the "Rule of Three," for the first Police Sergeant vacancy in a jurisdiction requesting a certification list, the NJCSC certifies the three highest-ranking candidates on the jurisdiction's eligibility list. For each additional vacancy, the NJCSC certifies the next ranked candidate on the eligibility list. If more than one candidate has the same final score, the tied candidates are certified together.

13. Each year between 2000 and 2008, the NJCSC administered a written examination as part of the Police Sergeant promotional process.

14. For the entire period between 2000 and 2008, approximately 89% of the white candidates who took the written examination passed the examination, while only approximately 73% of the African-American candidates passed the examination. This difference between the pass rate of African-American candidates and that of white candidates is statistically significant.

15. Moreover, when each administration of the written examination between 2000 and 2008 is considered separately, African-American candidates passed at a rate statistically significantly lower than did white candidates in each year.

16. For the entire period between 2000 and 2008, while approximately 89% of the white candidates who took the written examination passed the examination, only approximately 77% of the Hispanic candidates passed the examination. This difference between the pass rate of Hispanic candidates and that of white candidates is statistically significant.

17. Moreover, when each administration of the written examination between 2000 and 2008 is considered separately, Hispanic candidates passed at a rate lower than the rate at which white candidates passed in each year, and the difference in pass rates is statistically significant for each year between 2001 and 2008.

18. Because the NJCSC ranks candidates for promotion to Police Sergeant on eligibility lists based upon the candidates' combined written examination scores and seniority credits, and certifies candidates in descending rank-order from the eligibility lists, many candidates who pass the written examination do not rank high enough to be certified or promoted.

19. Among candidates who passed the NJCSC Police Sergeant written examination, African Americans were under-represented in the higher score ranges and over-represented in the lower score ranges for each year between 2000 and 2008. Thus, for each administration of the examination between 2000 and 2008, the mean written examination score of African-American candidates was statistically significantly lower than the mean written examination score of white candidates.

20. The difference between the African-American and white mean scores on the written examination are reflected in the final (*i.e.*, combined written examination and seniority) scores of candidates who passed the written examination. Thus, for each year from 2000 to 2008, the mean final score of African-American candidates was statistically significantly lower than the mean final score of white candidates.

21. Among candidates who passed the NJCSC Police Sergeant written examination, Hispanics were under-represented in the higher score ranges and over-represented in the lower score ranges for each year between 2001 and 2008. Thus, for each administration of the examination between 2001 and 2008, the mean written examination score of Hispanic candidates was statistically significantly lower than the mean written examination score of white candidates.

22. The difference between the Hispanic and white mean scores on the written examination are reflected in the final (*i.e.*, combined written examination and seniority) scores of candidates who passed the written examination. Thus, for each year from 2001 to 2008, the mean final score of Hispanic candidates was statistically significantly lower than the mean final score of white candidates.

23. In those jurisdictions for which the NJCSC established eligibility lists that

contained both white candidates and African-American or Hispanic candidates, African-American and Hispanic candidates were less likely to rank high enough to be placed on a certification list and considered for promotion than were white candidates. Between 2000 and 2008, approximately 35% of the white candidates on the eligibility lists in such jurisdictions were certified, while approximately 20% of African-American candidates and 22% of Hispanic candidates were certified. Similarly, while approximately 18% of the white candidates on the eligibility lists in such jurisdictions were promoted, approximately 9% of African-American candidates and 13% of Hispanic candidates were promoted.

24. Defendants' pass/fail use of the NJCSC Police Sergeant written examination to screen candidates for promotion and defendants' certification of candidates in descending rank-order, based on a combination of candidates' written examination scores and seniority credits, have resulted in disparate impact upon African-American candidates.

25. Defendants' pass/fail use of the NJCSC Police Sergeant written examination to screen candidates for promotion and defendants' certification of candidates in descending rank-order, based on a combination of candidates' written examination scores and seniority credits, have resulted in disparate impact upon Hispanic candidates.

26. Defendants have not demonstrated that their pass/fail use of the NJCSC Police Sergeant written examination or their certification of candidates in descending rank-order, based on a combination of candidates' written examination scores and seniority credits, is job related for the Police Sergeant position and consistent with business necessity.

27. Defendants have pursued and continue to pursue policies and practices that discriminate against African-American and Hispanic candidates and that deprive or tend to

deprive African Americans and Hispanics of employment opportunities or adversely affect their status as employees because of their race and national origin in violation of Section 707 of Title VII, 42 U.S.C. § 2000e-6. Defendants have implemented these policies and practices, among other ways, as follows:

- a. by using written promotional examinations as pass/fail screening devices in a manner that results in disparate impact upon African-American and Hispanic candidates for promotion to the position of Police Sergeant, is not job related for the position in question and consistent with business necessity, and does not otherwise meet the requirements of Section 703(k) of Title VII, 42 U.S.C. § 2000e-2(k);
- b. by certifying candidates for promotion to the position of Police Sergeant from eligibility lists in descending rank-order, based upon a combination of candidates' scores on the Police Sergeant written examination and seniority credits, where such rank-order certification results in disparate impact upon African-American and Hispanic candidates, is not job related for the position in question and consistent with business necessity, and does not otherwise meet the requirements of Section 703(k) of Title VII, 42 U.S.C. § 2000e-2(k); and
- c. by failing or refusing to take appropriate actions to correct the present effects of their discriminatory promotional practices.

28. The policies and practices of defendants described in Paragraphs 8 through 27 *supra*, constitute a pattern or practice of resistance to the full enjoyment by African Americans and Hispanics of their right to equal employment opportunities without discrimination based on

race or national origin, in violation of Section 707 of Title VII, 42 U.S.C. § 2000e-6. This pattern or practice is of such a nature and is intended to deny the full exercise of the rights secured by Title VII. Unless restrained by order of this Court, defendants will continue to pursue policies and practices that are the same as or similar to those alleged in this Complaint.

29. All conditions precedent to the filing of this lawsuit have been performed or have occurred.

WHEREFORE, the United States prays for an order enjoining defendants, the State of New Jersey and the New Jersey Civil Service Commission, and their officers, agents, employees, successors and all persons in active concert or participation with them from engaging in employment practices which discriminate against African Americans on the basis of Race and Hispanics on the basis of national origin in violation of Title VII, and specifically from:

- a. using written promotional examinations as pass/fail screening devices in a manner that results in disparate impact upon African-American and Hispanic candidates for promotion to the position of Police Sergeant, that are not job related for the position in question and consistent with business necessity, and do not otherwise meet the requirements of Section 703(k) of Title VII, 42 U.S.C. § 2000e-2(k);
- b. certifying candidates for promotion to the position of Police Sergeant from eligibility lists in descending rank-order, based upon a combination of candidates scores on the written examination and seniority credits, where such rank-order certification results in disparate impact upon African-American and Hispanic candidates, is not job related for the position in question and consistent with business necessity, and does not otherwise meet the requirements of Section



703(k) of Title VII, 42 U.S.C. § 2000e-2(k);


- c. failing or refusing to provide make-whole relief, including back pay with interest and promotion with retroactive seniority, to individuals who have suffered loss or will suffer loss as a result of the discriminatory policies and practices alleged in this Complaint; and
- d. failing or refusing to take appropriate action to overcome the present effects of the defendants' discriminatory policies and practices, including but not limited to the following:
  - (i) adopting promotional procedures that do not result in disparate impact or that otherwise comply with Title VII; and
  - (ii) taking such other reasonable actions that are necessary to correct the present effects of past discrimination.

Plaintiff United States prays for such additional relief as justice may require, together with its costs and disbursements in this action.

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Attorney General

THOMAS E. PEREZ  
Assistant Attorney General  
Civil Rights Division

By:

  
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JS 44 (Rev. 12/07, NJ 5/08)

**CIVIL COVER SHEET**

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

John M. Gadzichowski, Chief; Esther Lander, Deputy Chief; Barbara E. Thawley and Meredith L. Burrell, Employment Litigation Section, Civil Rights Division, U.S. Dept. of Justice, 950 Pennsylvania Ave., N.W., Washington D.C. 20530

**DEFENDANTS**

State of New Jersey and New Jersey State Civil Service Commission

County of Residence of First Listed Defendant \_\_\_\_\_

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

Anne Milgram, Attorney General for State of New Jersey; Lisa Dorio Ruch, Deputy Attorney General, Office of the Attorney

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
|   | PTF                        | DEF                        |   | PTF                        | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN**

(Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
 Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e et seq.

Brief description of cause:  
 Pattern or practice of employment discrimination based on race and national origin

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ Backpay  
Injunction, other

CHECK YES only if demanded in complaint:  
 JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S)**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

Explanation:

1/07/2010

DATE

SIGNATURE OF ATTORNEY OF RECORD

01/07/2010

Barbara E. Thawley

*Barbara E. Thawley*

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

**VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless diversity. Example: U.S. Civil Statute: 47 USC 553  
Brief Description: Unauthorized reception of cable service

**VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases. Provide a brief explanation of why the cases are related.

**Date and Attorney Signature.** Date and sign the civil cover sheet.