MURPHY ORLANDO LLC
Tyler Newman, Esq. (#335762021)
Amanda K. Baker, Esq. (#534262025)
494 Broad Street, 5th Floor
Newark, NJ 07102
(201) 451-5000
Attorneys for Defendants

LAUREN VOLPE Plaintiff, v. WEST ORANGE BOARD OF EDUCATION, and XAVIER FITZGERALD Defendants.	SUPERIOR COURT OF NEW JERSEY ESSEX COUNTY LAW DIVISION DOCKET NO. ESX-L-007367-26 Civil Action **AMENDED ANSWER, AFFIRMATIVE DEFENSES, JURY DEMAND, AND DEMANDS & CERTIFICATIONS ON BEHALF OF THE DEFENDANTS WEST ORANGE BOARD OF EDUCATION AND XAVIER FITZGERALD**

Defendants WEST ORANGE BOARD OF EDUCATION and XAVIER FITZGERALD ("Defendants") by its undersigned attorneys, for an answer to the Complaint (the "Complaint") of Plaintiff LAUREN VOLPE ("Plaintiff"), states as follows:

AS TO "JURISDICTION & VENUE"

1. Defendants admit the allegations of Paragraph 1 of the Complaint.

2. Defendants admit the allegations of Paragraph 2 of the Complaint.

3. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 3 of the Complaint, and thus deny same.

AS TO "PARTIES"

4. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 of the Complaint, and thus deny same.

5. Defendants admit the allegations of Paragraph 5 of the Complaint.

6. Defendants admit the allegations of Paragraph 6 of the Complaint.

AS TO "STATEMENT OF FACTS"

7. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7 of the Complaint, and thus deny same.

8. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 8 of the Complaint, and thus deny same.

9. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 9 of the Complaint, and thus deny same.

10. Defendants admit the allegations in Paragraph 10 of the Complaint.

11. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 11 of the Complaint, and thus deny same.

12. Defendants admit the allegations of Paragraph 12 of the Complaint.

13. Defendants admit the allegations of Paragraph 13 of the Complaint.

14. Defendants admit the allegations of Paragraph 14 of the Complaint.

15. Defendants deny the allegations of Paragraph 15 of the Complaint.

16. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 16 of the Complaint, and thus deny same.

17. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 17 of the Complaint, and thus deny same.

18. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 18 of the Complaint, and thus deny same.

19. Defendants deny the allegations of Paragraph 19 of the Complaint.

113. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 113 of the Complaint, and thus deny same.

114. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 114 of the Complaint, and thus deny same.

115. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 115 of the Complaint, and thus deny same.

116. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 116 of the Complaint, and thus deny same.

117. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 117 of the Complaint, and thus deny same.

118. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 118 of the Complaint, and thus deny same.

119. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 119 of the Complaint, and thus deny same.

120. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 120 of the Complaint, and thus deny same.

121. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 121 of the Complaint, and thus deny same.

122. Defendants deny the allegations of Paragraph 122 of the Complaint.

123. Defendants deny the allegations of Paragraph 123 of the Complaint.

124. Defendants admit Defendant Fitzgerald remained at the school byt lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 124 of the Complaint, and thus deny same.

125. Defendants admit the allegations of Paragraph 125 of the Complaint.

126. Defendants admit the allegations of Paragraph 126 of the Complaint.

127. Defendants admit the allegations of Paragraph 127 of the Complaint.

128. Defendants admit the allegations of Paragraph 128 of the Complaint.

129. Defendants admit the allegations of Paragraph 129 of the Complaint.

130. Defendants admit the allegations of Paragraph 130 of the Complaint.

131. Defendants admit the allegations of Paragraph 131 of the Complaint.

132. Defendants admit the allegations of Paragraph 132 of the Complaint.

133. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 133 of the Complaint, and thus deny same.

134. Defendants deny the allegations of Paragraph of 134 of the Complaint.

AS TO "THE NEW JERSEY LAW AGAINST DISCRIMINATION"

135. Defendants aver that the allegations of Paragraph 135 of the Complaint constitute a legal conclusion to which no response is required. To the extent that any response is required, Defendants deny the allegations in Paragraph 135 of the Complaint.

136. Defendants aver that the allegations of Paragraph 136 of the Complaint constitute a legal conclusion to which no response is required. To the extent that any response is required, Defendants deny the allegations in Paragraph 136 of the Complaint.

AS TO COUNT I
HOSTILE WORK ENVIRONMENT BASED ON A PROTECTED TRAIT UNDER THE NJLAD

137. Defendants repeat and reassert their responses to the allegations in each preceding Paragraph as if fully set forth herein.