

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – CIVIL PART
BURLINGTON COUNTY**

**JOSEPH FABOZZI,
Plaintiff,**

v.

**JENNIFER OLLAND; TOWNSHIP OF MOUNT LAUREL, et al.,
Defendants.**

DOCKET NO.: BUR-L-2334-25

**PLAINTIFF’S REQUEST FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT JENNIFER OLLAND**

Pursuant to Rule 4:18-1 of the New Jersey Rules of Court, Plaintiff Joseph Fabozzi requests that Defendant Jennifer Olland produce the following documents within the time required by the Rules of Court.

These requests are continuing in nature. If Defendant Jennifer Olland obtains additional responsive documents after producing documents in response to these requests, Defendant shall supplement the production in accordance with the New Jersey Rules of Court.

DEFINITIONS

“Communication” means any oral, written, or electronic transmission of information, including but not limited to conversations, meetings, telephone calls, voicemail messages, emails, text messages, instant messages, social media messages, letters, memoranda, or any other exchange of information between two or more persons.

“Document” means any writing, recording, or electronically stored information, including emails, reports, notes, memoranda, body-camera recordings, text messages, letters, photographs, videos, or any other form of recorded information.

“Complaint” means any allegation, report, accusation, or communication asserting misconduct, criminal conduct, harassment, or other improper behavior, including any citizen criminal complaint, affidavit of probable cause, or written statement submitted to the Mount Laurel Police Department or the Mount Laurel Municipal Court.

“Civil lawsuit” means the action filed by Plaintiff Joseph Fabozzi against Defendant Jennifer Olland in the Superior Court of New Jersey, Ocean County, under Docket No. OCN-L-002231-22.

**PLAINTIFF’S REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT JENNIFER OLLAND**

1. Produce all documents and communications in which you reported, described, or repeated the statement that Plaintiff Joseph Fabozzi said at a Sweet Sixteen party that “the girls will be so fuckable when they turn 18.”
2. Produce all documents and communications between you and any classroom aide, paraprofessional, or School Personnel at Hillside Elementary School concerning Plaintiff Joseph Fabozzi during the 2021–2022 school year.
3. Produce all documents and communications between you and any employee, administrator, or representative of the Mount Laurel School District concerning Plaintiff Joseph Fabozzi prior to the referral made to the New Jersey Division of Child Protection and Permanency.
4. Produce all documents and communications in which you stated or suggested that Plaintiff Joseph Fabozzi touched children, engaged in inappropriate conduct with children, or otherwise behaved improperly toward children.
5. Produce all documents and communications between you and Officer Justin Turino concerning Plaintiff Joseph Fabozzi on or before November 3, 2022.
6. Produce all documents and communications between you and Officer Sweely concerning Plaintiff Joseph Fabozzi.

7. Produce all documents and communications between you and Prosecutor Matthew Weng concerning Plaintiff Joseph Fabozzi or the harassment complaint filed on November 3, 2022.
8. Produce all documents, communications, or records you provided to Prosecutor Matthew Weng prior to the harassment trial held on September 13, 2023.
9. Produce all documents and communications concerning the summons and complaint in civil lawsuit OCN-L-002231-22 and any attempts to serve you with that summons and complaint.
10. Produce all documents and communications concerning the summons and complaint in civil lawsuit OCN-L-002231-22 and any attempts to serve you with that summons and complaint.
11. Produce the complete Parental Mediation Agreement dated May 3, 2022 referenced in your November 3, 2022 handwritten statement and affidavit of probable cause.
12. Produce all documents and communications in which you stated or asserted that “court custody mediation mentions that Joseph F. Fabozzi is not to ever be in the presence of my daughters.”

13. Produce all documents and communications concerning whether Plaintiff Joseph Fabozzi may attend family events hosted by Joseph Dunnkosky at which Jasmine Dunnkosky or Autumn Dunnkosky may be present.
14. Produce all documents and communications in which you instructed Jasmine Dunnkosky or Autumn Dunnkosky to notify you if Plaintiff Joseph Fabozzi appeared at Joseph Dunnkosky's wedding or any other family event.
15. Produce all documents, communications, photographs, recordings, or other materials supporting the allegations made by you against Plaintiff Joseph Fabozzi in the harassment complaint filed on November 3, 2022.
16. Produce all text messages, emails, social media messages, or other communications between you and any parent, member of the Hillside Elementary School Parent Teacher Organization (PTO), or Hillside Elementary School staff member concerning Plaintiff Joseph Fabozzi.
17. Produce all documents and communications concerning any allegation that Plaintiff Joseph Fabozzi touched a child, behaved inappropriately toward a child, or engaged in misconduct involving a child, including any communications with other parents, school personnel, or members of the community.

18. Produce all documents and communications in which you discussed Plaintiff Joseph Fabozzi with any person and described him as engaging in inappropriate conduct with children, touching children, or making sexual statements concerning children.
19. Produce all telephone billing records, call detail records, and text message logs for any cellular telephone number used by you during January 1, 2022 through March 31, 2022, showing the telephone numbers of all incoming and outgoing calls and text messages.
20. Produce all telephone billing records, call detail records, and text message logs for any cellular telephone number used by you during January 1, 2022 through March 31, 2022, showing the telephone numbers of all incoming and outgoing calls and text messages.
21. Produce any contact list, address book, or other document identifying the names associated with telephone numbers stored on any cellular telephone used by you during the period January 1, 2022 through March 31, 2022.
22. Produce all telephone billing records, call detail records, and text message logs for any cellular telephone number used by you on November 3, 2022 showing the telephone numbers of all incoming and outgoing calls and text messages, including the date and time of each communication.

23. Identify every cellular telephone number used by you on November 3, 2022 and produce all documents sufficient to show the wireless carrier providing service for each such number.

24. Produce all documents and communications reflecting any telephone call, text message, or other communication between you and Officer Justin Turino or Officer Sweely on November 3, 2022.

25. Produce all social media messages, including Facebook messages, Facebook Messenger communications, Instagram messages, or other social media communications in which Plaintiff Joseph Fabozzi was discussed or referenced.