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Board of County Commissioners

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ATTORNEY-CLIENT COMMUNICATION

TO: Administration & Finance Committee

FROM: Office of the Passaic County Counsel

RE: Case Summary – *Christine Massood, et al. v. County of Passaic, et al.*

DATE: May 28, 2025

Date of Incident: June 8, 2024

NOC Filed: August 27, 2024

Complaint Filed: May 9, 2025

Answer Due: June 21, 2025 (County of Passaic was served on May 17, 2025)

Christine Massood and Louis Massood v. County of Passaic, et al., Docket No. PAS-L-1580-25

This matter arises from a trip and fall incident that occurred on June 8, 2024. the Plaintiff, Christine Massood, claims that she was walking around 209 Totowa Road in Wayne (Preakness Valley Golf Course), when she fell on “a depressed section of driveway caused by the installation of a pipe,” and injured her left wrist. Ms. Massood, who is represented by Richard D. Picini (Caruso Smith Picini, PC), alleges that her injuries were caused by the negligence of the County of Passaic and In the Drink Bar & Grill Corporation.

Based on the quoted language above from Ms. Massood’s Notice of Claim, and the Complaint, which alleges “a dangerous condition in the parking lot driveway of the defendants’ property,” it appears that the Ms. Massood was injured in the area outside of the In the Drink Restaurant and Bar, which is located on County-owned property (Preakness Valley Golf Course).

Ms. Massood’s husband, Louis Massood, is also a plaintiff in this matter, and he is asserting a claim for loss of consortium due to the injuries suffered by his wife. However, Mr. Massood did not file his own notice of tort claim, nor is he mentioned anywhere in the notice of claim filed by Ms. Massood.



RESOLUTION REQUEST FORM

NAME OF REQUESTER: Nadege D. Allwaters, Esq. DEPARTMENT/DIVISION: County Counsel

1. DESCRIPTION OF RESOLUTION

TYPE OF RESOLUTION: Litigation

PROJECT NAME & NO. (If applicable): Christine Massood v. County of Passaic, et al., Docket No. PAS-L-1580-25

PROJECT LOCATION (If applicable): Passaic County Superior Court

SUMMARY:

The office of the Passaic County Counsel is seeking authorization to retain Waters McPherson McNeill, PC to provide outside legal services in the matter of Christine Massood v. County of Passaic, et al., Docket No. PAS-L-1580-25, in an amount not to exceed fifty thousand dollars (\$50,000.00).

2. **CERTIFICATION OF FUNDS**

AMOUNT OF EXPENDITURE: \$ 50,000.00

REQUISITION # _____

(A copy of the requisition from Edmunds must be attached)

PURCHASE ORDER # _____

(A copy of the purchase order and change order request form must be attached)

ACCOUNT # T-19-56-850-000-801

(If more than one account please list individually below, with designated amounts)

ACCOUNT # _____ **Amount:** _____

ACCOUNT # _____ **Amount:** _____

ACCOUNT # _____ **Amount:** _____

ACCOUNT # _____ **Amount:** _____

3. **METHOD OF PROCUREMENT**

☐ **RFP #:** _____

☒ **RFQ #:** RFQ-25-042

Add qualifying resolution no. if requesting an award

☐ **BID #:** _____

☐ **CO-OP:** _____ **Number:** _____

Did the vendor agree to extend pricing to Passaic County Cooperative Pricing #38PCCP?

☐ Yes ☐ No

☐ **STATE CONTRACT #:** _____

☐ **EXCEPTIONS** (per N.J.S.A. 40A:11-5 et seq.): _____

☐ **QUOTES:** (Please add all solicited quotes herein; including vendor name and total amount.)

☐ **NON-FAIR & OPEN:** (A copy of an executed *Business Entity Disclosure Certification* must be attached)

☐ **OTHER:** _____

4. CERTIFICATION OF PROHIBITED ACTIVITIES:

(Please check the Russia-Belarus Prohibited Activity Entity List & Chapter 25 List for this section)

☒ **Confirmed not on Russia-Belarus Entity List**

Date Confirmed: 5/28/25

<https://sanctionssearch.ofac.treas.gov/>

☒ **Confirmed not on Chapter 25 Prohibited Activities in Iran List**

Date Confirmed: 5/28/25

<http://www.state.nj.us/treasury/purchase/pdf/Chapter25List.pdf>

5. COMMITTEE REVIEW / DISTRIBUTION

(Please check off the committee(s) the resolution request is being submitted to and the meeting date it is associated with)

- ☒ Administration & Finance
- ☐ Health & Human Services
- ☐ Law & Public Safety
- ☐ Planning & Economic Development
- ☐ Public Works

Meeting Date: 5/28/25

Meeting Date: _____

Meeting Date: _____

Meeting Date: _____

Meeting Date: _____