

LAWRENCE N. LAVIGNE, ESQ. 005581982
 MARK & LAVIGNE, L.L.C.
 675 Morris Avenue, Suite 300
 Springfield, NJ 07081
 Tel: (973) 845-6606
 Fax: (973) 232-5226
 llavigne@newjerseyattorneys.com
 Attorneys for Plaintiff

CHRISTOPHER SORRENTINO)	Superior Court of New Jersey
Plaintiff,)	Law Division
)	Union County
v.)	Docket No:
)	
CITY OF PLAINFIELD ,)	
)	COMPLAINT AND JURY DEMAND
Defendant)	
)	

CHRISTOPHER SORRENTINO residing in the Highbridge, State of New Jersey complains of the Defendants and says:

FACTS COMMON TO ALL COUNTS

1. At all relevant times hereto, Plaintiff was an employee of the City of Plainfield, specifically the Fire Division.
2. Plaintiff is certified by the State of New Jersey as a
3. At all relevant times hereto, Plaintiff held the Fire fighter employed by Defendant for approximately 10 years.
4. At all relevant times, Plaintiff was an employee as that term is defined by N.J.S.A. 10:5-1 et. seq., the New Jersey Law Against Discrimination ("NJLAD").
5. At all relevant times, Defendant was an employer as that term is defined by N.J.S.A. 10:5-1 et. seq., the New Jersey Law Against Discrimination ("NJLAD").
6. At all relevant times hereto, Plaintiff was a Caucasian man.
7. At all relevant times hereto, Kenneth Childress was the civilian director of the Plainfield Fire Division.
8. Kenneth Childress is a Black man.

9. At certain times relevant hereto, Plaintiff was assigned the role of interim Lieutenant.
10. Prior to the pandemic Plaintiff sat for the test for Lieutenant ("LT")'s position and placed second.
11. After the pandemic, a list for the appointment of Lieutenant was posted.
12. Plaintiff was passed over for the position and the Black employee who had placed 3rd was promoted above him.
13. Plaintiff possessed more certifications than the individuals who were promoted in front of him.
14. Plaintiff was more qualified than the others for the position.
15. In November 2023, Plaintiff was number 1 on the list and he sought promotion to permanent position of LT but was passed over in favor of a less qualified Black staff member.
16. In or about February 2025, Plaintiff again sought a promotion to LT.
17. At this time, Plaintiff was still number 1 on the list.
18. Plaintiff was passed over again by four lesser qualified Black staff members who were clearly lower on the list were promoted. This included a Black employee who had scored lower than Plaintiff and had been passed over in the past.
19. Plaintiff's qualifications were/are superior to those of the individuals, who scored lower on the list who received promotions to LT.
20. In addition to passing Plaintiff over for promotions which he clearly was qualified for, Defendant blocked Plaintiff from joining the New Jersey Task Force 1 claiming that he was "too valuable to the department" However, Defendant failed to promote Plaintiff to LT each time he sought that position.
21. Plaintiff has been denied training provided to others.
22. In March 2025, Plaintiff was moved from the outside house to headquarters against his wishes.
23. Since around April 2021, Director Childress has often ignored Plaintiff and has been short with him.
24. Plainfield is the unusual employer which has a history of discriminating against White Men.

COUNT ONE

25. Plaintiff repeats and re-alleges each of the allegations contained in paragraphs 1-24 contained in Facts for All Counts as if each was alleged herein at length.
26. Plaintiff is a member of a protected class.
27. Plaintiff was not promoted due to his inclusion in a protected class.
28. Plainfield is the unusual employer which has a history of discriminating against White Men.
29. Defendant's acts are in violation of the NJLAD.
30. The failure to promote Plaintiff is an adverse employment action.
31. There is/are no legitimate business reasons for the adverse employment actions undertaken by Defendants.
32. Any explanation offered by Defendant as to why Plaintiff has not been promoted is pretext as Defendants promoted Non-White candidates with inferior qualifications with less experience than Plaintiff had, and Defendants required Plaintiff to train others with less experience than he had.

WHEREFORE: Plaintiff demands judgment against defendant for compensatory damages, attorney's fee pursuant to statute, costs of suit and any other relief that this Court deems just.

COUNT TWO

33. Plaintiff repeats and re-alleges each of the allegations contained in paragraphs 1-32 above as if each was alleged herein at length.
34. Defendants created and permitted a hostile work environment to exist in violation of the NJLAD.
35. Plaintiff was caused to suffer injury as a result of the hostile work environment.

WHEREFORE: Plaintiff demands judgment against defendant for compensatory damages, attorney's fee pursuant to statute, costs of suit and any other relief that this Court deems just.

COUNT THREE

36. Plaintiff repeats and re-alleges each of the allegations contained in paragraphs 1-35 above as if each was alleged herein at length.

37. Due to his inclusion in a protective class, Plaintiff was treated different from other employees not part of a protected class in violation of the NJLAD.

38. As a result of the disparate treatment, Plaintiff suffered injury.

WHEREFORE: Plaintiff demands judgment against defendant for compensatory damages, attorney's fee pursuant to statute, costs of suit and any other relief that this Court deems just.

COUNT FOUR

39. Plaintiff repeats and re-alleges each of the allegations contained in paragraphs 1-38 above as if each was alleged herein at length.

40. At all relevant times hereto, Defendants did not have effective proper policies and procedures in place to protect employees from discrimination, harassment and/or retaliation in violation of the law.

41. In the event that it is found that Defendant had proper policies in place, it is alleged that said policies were ineffective in that they were not enforced in Plaintiff's case.

WHEREFORE: Plaintiff demands judgment against defendants for compensatory damages, attorney's fee pursuant to statute, costs of suit and any other relief that this Court deems just.

NOTICE PURSUANT TO RULES 1:5-1(a) & 4:17-4(c)

TAKE NOTICE that the undersigned attorneys, counsel for this Plaintiff, do hereby demand, pursuant to Rules 1:5-1(a) and 4:17-4(c) that each party herein serving pleadings and interrogatories and receiving answers thereto serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers and other material referred to therein, upon the undersigned attorney and TAKE NOTICE that this is a continuing demand.

DEMAND FOR TRIAL BY JURY

The Plaintiff hereby demands a trial by a jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to R. 4:25-4, Lawrence N. Lavigne, Esq. is hereby designated as trial counsel in the within captioned matter.

CERTIFICATION

I hereby certify pursuant to R. 4:5-1 that, to my present knowledge, the matter in controversy is the not the subject of any other action. I further certify that, to my present knowledge, no other party should be joined in the within action at this time, however, we is still reviewing this matter to determine if additional parties should be joined. This is to further certify that the within pleading has been served within the time provided by the Rules governing the Courts of the State of New Jersey.

CERTIFICATION OF OTHER MATTERS

None.

Mark & Lavigne LLC
Attorneys for Plaintiff

By: Lawrence N. Lavigne

LAWRENCE N. LAVIGNE

Dated: March 17, 2025

Civil Case Information Statement

Case Details: UNION | Civil Part Docket# L-001079-25

Case Caption: SORRENTINO CHRISTOPH VS CITY OF PLAINFIELD

Case Initiation Date: 03/17/2025

Attorney Name: LAWRENCE N LAVIGNE

Firm Name: MARK & LAVIGNE, LLC

Address: 675 MORRIS AVE STE 300

SPRINGFIELD NJ 07081

Phone: 9738456606

Name of Party: PLAINTIFF : Sorrentino, Christoph

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Christoph Sorrentino? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

03/17/2025
Dated

/s/ LAWRENCE N LAVIGNE
Signed

