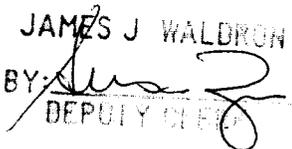


**LAW OFFICES OF JEROME M. DOUGLAS, LLC**  
Jerome M. Douglas, Esq. (042921995)  
1600 Route 208 North  
P.O. Box 670  
Hawthorne, New Jersey 07507  
Phone: (973) 238-8638  
Fax: (973) 238-8639  
Proposed Attorney for Debtor, Nicholas V. Campanella

U.S. BANKRUPTCY COURT  
FILED  
NEWARK, NJ  
2016 NOV -1 PM 12:40  
JAMES J WALDRON  
BY:   
DEPUTY CLERK

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:  
NICHOLAS CAMPANELLA  
Debtors.

---

JACQUELINE JALIL, LUISA ROJAS, AND TANIA  
MENIA,  
  
Plaintiff,  
  
vs.  
  
NICHOLAS CAMPANELLA,  
  
Defendant.

Case No. 16-21185  
Chapter 11  
Honorable Vincent F. Papalia  
Adv. Pro. No. 16-01690  
  
Pretrial Conference: 11/10/2016  
At 10:00 a.m.

**ANSWER**

Defendant Nicholas Campanella by way of Answer to the Adversary Complaint (the "Complaint"), respectfully states as follows:

**JURISDICTION AND VENUE**

- a. Defendant admits the allegations within the corresponding paragraph of the Complaint.
- b. Defendant admits the allegations within the corresponding paragraph of the Complaint.
- c. Defendant admits the allegations within the corresponding paragraph of the Complaint.

**FACTS**

- 1. Defendant admits the allegations within the corresponding paragraph of the Complaint.

2. Defendant admits the allegations within the corresponding paragraph of the Complaint.
3. Defendant admits the allegations within the corresponding paragraph of the Complaint.
4. Defendant admits the allegations within the corresponding paragraph of the Complaint.
5. Defendant admits that he has an ownership interest in Pilgrim Medical Center (“PMC”) and was in a supervisory position to the plaintiffs at all times. Defendant denies that he is currently one of three full-time, practicing physicians at PMC. By way of further answer, Defendant has substantially reduced the number of hours worked at the practice but was one of three practicing physicians at PMC at all relevant times.
6. Defendant admits the allegations within the corresponding paragraph of the Complaint as to Dr. Jenkins being a practicing physician at PMC but denies Dr. Jenkins had supervisory authority over Plaintiffs.
7. Defendant admits the allegations within the corresponding paragraph of the Complaint.
8. Defendant admits the allegations within the corresponding paragraph of the Complaint.
9. Defendant admits the allegations within the corresponding paragraph of the Complaint.
10. Defendant denies the allegations within the corresponding paragraph of the Complaint.
11. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
12. Defendant denies the allegations within the corresponding paragraph of the Complaint.
13. Defendant denies the allegations within the corresponding paragraph of the Complaint.
14. Defendant denies the allegations within the corresponding paragraph of the Complaint.
15. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.

16. Defendant denies the allegations within the corresponding paragraph of the Complaint.
17. Defendant admits that Jalil did leave work but is without sufficient knowledge, information, or belief to form an opinion as to the what, if any, medical condition Jaliil suffered from, or if she was required to leave work as a result of such condition, or if she was required to seek medical attention and therefore, denies those factual allegations found in the corresponding paragraph of the Complaint.
18. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
19. Except to admit that Jaliil did inform Defendant that she would take a number of days off from work Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
20. Defendant denies the allegations within the corresponding paragraph of the Complaint.
21. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
22. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
23. Defendant admits the allegations within the corresponding paragraph of the Complaint.
24. Defendant admits the allegations within the corresponding paragraph of the Complaint.
25. Defendant admits the allegations within the corresponding paragraph of the Complaint.

26. Except to admit that Jalil did telephone Defendant to confirm she would return to work on January 2, 2013, Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
27. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
28. Defendant denies the allegations within the corresponding paragraph of the Complaint.
29. Defendant denies the allegations within the corresponding paragraph of the Complaint.
30. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
31. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
32. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
33. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.

34. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
35. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
36. Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
37. Except to admit that Defendant terminated Mena's employment at PMC, Defendant is without sufficient knowledge, information, or belief to form an opinion as to the truth of the allegations found in the corresponding paragraph of the Complaint and, therefore, denies same.
38. Defendant denies the allegations within the corresponding paragraph of the Complaint.
39. Defendant denies the allegations within the corresponding paragraph of the Complaint.
40. Defendant denies the allegations within the corresponding paragraph of the Complaint.
41. Defendant admits terminating Rojas' employment at PMC during a phone call but denies the context of the call as referred to within the corresponding paragraph of the Complaint.
42. Defendant denies the allegations within the corresponding paragraph of the Complaint.

### COUNT I

43. To the extent that the corresponding paragraph of the Complaint is a legal conclusion, no response is required. To the extent that the corresponding paragraph of the Complaint contains factual allegation, Defendant denies same.
44. Defendant admits the allegations within the corresponding paragraph of the Complaint.

45. Defendant denies the allegations within the corresponding paragraph of the Complaint.
46. To the extent that the corresponding paragraph of the Complaint is a legal conclusion, no response is required. To the extent that the corresponding paragraph of the Complaint contains factual allegation, Defendant denies same.
47. To the extent that the corresponding paragraph of the Complaint is a legal conclusion, no response is required. To the extent that the corresponding paragraph of the Complaint contains factual allegation, Defendant denies same.
48. Defendant admits the allegations within the corresponding paragraph of the Complaint.
49. The corresponding paragraph of the Complaint is a legal conclusion to which no answer is required.
50. To the extent that the corresponding paragraph of the Complaint is a legal conclusion, no response is required. To the extent that the corresponding paragraph of the Complaint contains factual allegation, Defendant denies same.

**LAW OFFICES OF JEROME M. DOUGLAS, LLC**  
Proposed Counsel to the Debtor

Dated: October 25, 2016

/s/ Jerome M. Douglas  
Jerome M. Douglas