

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

MARJORIE LAMB as next friend of )  
A.B. and J.B. and R.B; and MARJORIE LAMB )  
as Administratrix of the Estate of THOMAS )  
BURNS, )  
Plaintiffs, )

v. )

Civil Action No. )

STANLEY TAYLOR; CORRECTIONAL )  
MEDICAL SERVICES; CERTAIN UNKNOWN )  
INDIVIDUALEMPLOYEES OF THE STATE OF )  
DELAWARE DEPARTMENT OF )  
CORRECTION; RAPHAEL WILLIAMS; )  
CERTAIN UNKNOWN INDIVIDUAL )  
EMPLOYEESOF CORRECTIONAL MEDICAL )  
SERVICES; and STATE OF DELAWARE )  
DEPARTMENT OF CORRECTION, )  
Defendants. )

JURY TRIAL DEMANDED

**COMPLAINT**

**PARTIES**

1. Plaintiff Marjorie Lamb is a resident of Landenberg, Pennsylvania, and was the former wife of decedent Thomas J. Burns (who is hereinafter sometimes referred to as "Mr. Burns") at the time of the death of Mr. Burns.

2. Plaintiff Marjorie Lamb is the mother and next friend of her minor son A.B. (date of birth 1993) and her minor daughter J.B. (date of birth 1997), and her minor son R.B. (date of birth 1997), all of whom are the children of decedent Thomas J. Burns.

3. Plaintiff Marjorie Lamb as Administratrix of the Estate of Thomas J. Burns has been appointed Administratrix of the Estate of Thomas J. Burns by the New Castle County Register of Wills.

4. Defendant Stanley Taylor was the Commissioner of Correction for the State of Delaware at relevant times hereto, and in that capacity was the Chief Officer of the Department of Correction (the department will hereinafter sometimes be referred to as the "DOC").

5. Defendant Raphael Williams was at all times relevant hereto the Warden of the Howard R. Young Correctional Institution (which was formerly often referred to as "Gander Hill," and which will hereinafter be referred to as "HRYCI").

6. Defendants, unknown individual employees of the DOC, were, on information and belief, involved in the care and custody of Thomas J. Burns, either directly or indirectly by virtue of their obligations to properly administer such care and custody, at relevant times hereto.

7. Defendant, State of Delaware Department of Correction, is a subdivision of the State of Delaware.

8. Defendant, Correctional Medical Services (hereinafter sometimes referred to as "CMS"), is, on information and belief, a corporation responsible, at all times relevant hereto, for the performance of medical services within HRYCI pursuant to a contract with the State of Delaware.

9. Defendants, unknown individual employees of CMS, were, on information and belief, involved in the care and custody of, either directly or indirectly by virtue of their obligations to properly administer such care and custody, at relevant times hereto.

### JURISDICTION

10. The United States District Court for the District of Delaware has jurisdiction over the parties and the claims by virtue of the pendency of a federal claim under 42 U.S.C. § 1983 and 28 U.S.C. §§ 1331 and 1343, and under the principles of ancillary and pendent jurisdiction as well as the supplemental jurisdiction provisions of 28 U.S.C. § 1367.

### FACTS

11. Decedent Thomas J. Burns graduated from Delaware Law School of Widener University in 1983, but on information and belief, he never took the Delaware (or any other) bar exam.

12. Plaintiff Marjorie Lamb was married to decedent Thomas J. Burns on March 19, 1993, and was divorced from Mr. Burns on July 6, 2000.

13. During the marriage of Marjorie Lamb and Thomas J. Burns, Mr. Burns demonstrated behavior that indicated that he suffered from mental illness, and this behavior led directly to their divorce.

14. Beginning shortly before the divorce became final and continuing thereafter, Mr. Burns initiated multiple lawsuits against Ms. Lamb, Ms. Lamb's business, Ms. Lamb's relatives, and others; these lawsuits raised false allegations against the defendants, and indicated the existence in Mr. Burns of an irrational and troubled mindset.

15. The irrational and troubled mindset of Mr. Burns also manifested itself in behavior that was disturbing and threatening to Ms. Lamb and others.

16. As a result of Mr. Burns' irrational and threatening conduct, Ms. Lamb sought assistance from the Family Court of the State of Delaware and others.

17. In an apparent attempt to discredit the actions of the Family Court relating to his divorce from Ms. Lamb and subsequent matters, Mr. Burns forged documents suggesting that a Family Court judge presiding in the divorce action had been improperly influenced as a result of business dealings between the judge and Ms. Lamb; no such business dealings had ever occurred, however, and the suggestion that they had occurred was solely the product of Mr. Burns' troubled mind.

18. Mr. Burns was prosecuted and convicted by the State of Delaware for forging documents relating to the Family Court judge.

19. After his conviction, when he failed to appear in court for sentencing, Mr. Burns became subject to a warrant for his arrest.

20. On information and belief, at some point in or near the time of his conviction, Mr. Burns submitted a document to the Department of Justice entitled "Stay of Death Sentence" or words to that effect; again, this document had no relevance to his legal situation, but appears to have been an indication of his troubled mind.

21. In apparent awareness that he was about to be arrested, Mr. Burns attempted suicide with pills and alcohol in late May of 2006, and was taken to Christiana Hospital.

22. The police became aware of his presence in Christiana Hospital, and upon his release from the hospital he was taken into custody and housed at HRYCI.

23. On information and belief, Mr. Burns was initially placed on suicide watch at HRYCI.

24. Officials of the Department of Correction, including Defendants Stanley Taylor, and Raphael Williams were placed on notice that Mr. Burns was at great risk for suicide by local

mental health advocates, including Patricia McDowell of the National Alliance of the Mentally Ill.

25. On information and belief, CMS personnel were aware of Mr. Burns' psychiatric problems and of the risk of his suicide.

26. On information and belief, despite the risk of suicide, Mr. Burns was removed from the suicide watch on which he had been placed by a CMS counselor, and was placed on a less restrictive watch, and was provided with, among other things, bed sheets.

27. Shortly before 5:00 a.m. on May 30, 2006, Mr. Burns was found in his cell at HRYCI, having hanged himself with a bed sheet.

28. Mr. Burns was pronounced dead on May 30, 2006.

#### **COUNT I**

#### **VIOLATION OF CIVIL RIGHTS UNDER COLOR OF STATE LAW, 42 U.S.C. § 1983 – CRUEL AND UNUSUAL PUNISHMENT (BY MARJORIE LAMB AS ADMINISTRATRIX AND NEXT FRIEND AGAINST ALL INDIVIDUAL DEFENDANTS AND CMS)**

29. Paragraphs 1 to 28 are restated as if more fully set forth herein.

30. The vulnerability of Thomas J. Burns to suicide constituted a serious medical need of which defendants knew or should have known, and the actions and/or inactions of defendants, under color of state law, in addressing or failing to address that need, constituted deliberate indifference which could be expected to lead to substantial and unnecessary suffering, injury, and/or death, and which did, in fact, lead to the death of Mr. Burns.

31. As a result of the wrongful actions of the Defendants, Mr. Burns suffered attendant physical injuries, mental anguish, pain and suffering, and death, and was deprived of his right to life and his right to be free from cruel and unusual punishment, for which Plaintiff Marjorie Lamb as Administratrix and next friend and individually now seeks compensation.

**COUNT II**

**VIOLATION OF CIVIL RIGHTS UNDER COLOR OF STATE LAW,  
42 U.S.C. § 1983 – FAILURE TO TRAIN AND/OR MAINTENANCE OF WRONGFUL  
CUSTOMS, PRACTICES AND POLICIES AND/OR DENIAL OF LIFE AND LIBERTY  
WITHOUT DUE PROCESS OF LAW AND CRUEL AND UNUSUAL PUNISHMENT  
(BY MARJORIE LAMB AS ADMINISTRATRIX AND NEXT FRIEND AGAINST CMS  
AS A PERSON AND AS A STATE ACTOR, AND AGAINST  
INDIVIDUAL CMS DEFENDANTS)**

32. Paragraphs 1-31 are restated as if more fully set forth herein.

33. In performing its medical services for the DOC, CMS and the individual CMS Defendants were state actors performing state functions under color of state law.

34. The death of Thomas Burns was the direct result of the customs, practices, policies and procedures of CMS and the individual CMS defendants, including but not limited to: a failure to properly train and supervise CMS personnel so as to properly recognize suicidal inmates and how to properly care for inmates identified as making previous attempts on their life, and/or a failure to institute appropriate procedures for the timely transmission of important medical information to appropriate personnel.

35. The aforesaid actions of CMS and the individual CMS Defendants amounts to deliberate indifference to the rights of inmates, including the rights of Mr. Burns.

36. As a result of the wrongful actions of the Defendants, Mr. Burns suffered attendant physical injuries, mental anguish, pain and suffering, and death, and was deprived of his right to life and his right to be free from cruel and unusual punishment, for which Plaintiff Marjorie Lamb as Administratrix and next friend now seeks compensation.

**COUNT III**

**VIOLATION OF CIVIL RIGHTS UNDER COLOR OF STATE LAW, 42 U.S.C. § 1983 –  
FAILURE TO TRAIN AND/OR MAINTENANCE OF WRONGFUL CUSTOMS,  
PRACTICES AND POLICIES (BY MARJORIE LAMB AS ADMINISTRATRIX AND  
NEXT FRIEND AGAINST THE STATE OF DELAWARE DEPARTMENT OF  
CORRECTIONS AND THE INDIVIDUAL DEFENDANT EMPLOYEES OF THE DOC  
INCLUDING STANLEY TAYLOR AND RAPHAEL WILLIAMS)**

37. Paragraphs 1 to 36 are restated as if more fully set forth herein.

38. The death of Thomas J. Burns was the direct result of the customs, practices, policies and procedures of defendant Stanley Taylor, defendant Raphael Williams, the individual DOC defendants, and the defendant State of Delaware Department of Correction, including but not limited to: a failure to properly train and supervise DOC personnel so as to properly recognize suicidal inmates and how to properly care for inmates identified as having made previous attempts on their life, and/or a failure to institute appropriate policies and procedures for the timely transmission of important medical information to appropriate personnel and the failure to institute appropriate policies and procedures for the care and handling of suicidal inmates.

39. The aforesaid actions of Defendants constitute deliberate indifference to the rights of inmates who come into contact with employees of the DOC and CMS, including the rights of Mr. Burns.

40. As a direct and proximate result of the actions of the Defendants, Thomas J. Burns suffered attendant physical injuries, mental anguish, pain and suffering, and death, and was deprived of his right to life and his right to be free from cruel and unusual punishment, for which Plaintiff Marjorie Lamb as Administratrix now seeks compensation.

**COUNT IV**

**WRONGFUL DEATH UNDER 10 DEL. C. § 3724 (BY MARJORIE LAMB AS ADMINISTRATRIX AND AS NEXT FRIEND, AGAINST CMS AND THE INDIVIDUAL DEFENDANTS)**

41. Paragraphs 1-40 are restated as if more fully set forth herein.

42. The aforesaid actions of the Defendants caused the wrongful death of Thomas J. Burns.

43. Plaintiffs are authorized to recover for the damages they have suffered as a result of the wrongful death of Thomas J. Burns pursuant to the terms of 10 Del. C. § 3724, and they have suffered severe damages as identified thereunder, including but not limited to the loss of companionship and support of their husband and/or father, Thomas J. Burns, with attendant and severe emotional anguish.

**COUNT V**

**SURVIVAL ACTION UNDER 10 DEL. C. § 3701 FOR MEDICAL MALPRACTICE (BY MARJORIE LAMB AS ADMINISTRATRIX AND NEXT FRIEND AGAINST CMS AND THE INDIVIDUAL CMS DEFENDANTS)**

44. Paragraphs 1-43 are restated as if more fully set forth herein.

45. The aforesaid actions and inactions of the Defendants, and other actions and inactions, constituted medical malpractice, causing great pain and suffering, physical injury, and death to Thomas J. Burns.

46. Plaintiff Marjorie Lamb as Administratrix and next friend is authorized to recover for the damages suffered by Thomas J. Burns as a result of the medical malpractice of the Defendants, pursuant to 10 Del. C. § 3701.

**WHEREFORE**, Plaintiffs demand that judgment be entered in their favor against Defendants on the above claims, including awards of compensatory damages, punitive damages,



costs of suit, interest, attorneys' fees under 42 U.S.C. § 1988 and any other appropriate or relevant statutory or common law basis, and such other and further relief as this Court may deem appropriate.

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Attorneys for Plaintiffs

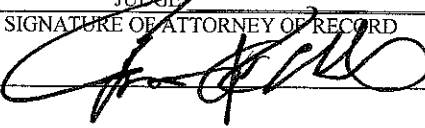
**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTION ON THE REVERSE OF THE FORM).

<p><b>I. (a) PLAINTIFFS</b>  <b>Marjorie Lamb as next friend of A.B. and J.B. and R.B. and Marjorie Lamb as Administratrix of the Estate of Thomas Burns</b></p> <p>(b) County of Residence for First Listed Plaintiff <u>New Castle County</u>                  (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number)                  Jeffrey K. Martin, Esq.                      Herbert G. Feuerhake, Esq.                  Martin &amp; Wilson, P.A.                      521 West Street                  1508 Pennsylvania Avenue              Wilmington, DE 19801                  Wilmington, DE 19806                      (302) 658-6101                  (302) 777-4681                                  <a href="mailto:herblaw@verizonmail.com">herblaw@verizonmail.com</a>  <a href="mailto:jmartin@martinandwilson.com">jmartin@martinandwilson.com</a></p>	<p><b>DEFENDANTS</b>                  Stanley Taylor, Correctional Medical Services; Certain unknown individual employees of the State of Delaware Department of correction; Raphael Williams; Certain unknown individual employees of Correctional Medical Services; and State of Delaware Department of Correction                  County of Residence of First Listed Defendant _____                  (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED</p> <p>Attorneys (If Known)</p>
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<p><b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant) (For Diversity Cases Only)</p> <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:33%;">PTF <input type="checkbox"/> DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated <i>or</i> Principal Place of Business in This State</td> <td style="width:33%;">PTF <input type="checkbox"/> DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> DEF <input type="checkbox"/> 2</td> <td>Incorporated <i>and</i> Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 1	Incorporated <i>or</i> Principal Place of Business in This State	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 2	Incorporated <i>and</i> Principal Place of Business in Another State	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 1	Incorporated <i>or</i> Principal Place of Business in This State	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 4										
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Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> DEF <input type="checkbox"/> 6										

IV. NATURE OF SUIT (Place an "X" in One Box Only)					
CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise  <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejection <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury  <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/ Disabilities - Employment <input type="checkbox"/> 446 Amer. w/ Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth In Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability  <b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality

				Of State Statutes
<b>V. ORIGIN</b> (Place an "X" in One Box only)				
<input type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify) <input type="checkbox"/> 6 Multidistrict Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment				
<b>VI. CAUSE OF ACTION</b>	Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1983			
	Brief description of cause:			
<b>VII. REQUESTED IN COMPLAINT:</b>	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	<b>DEMAND \$</b> money damages	CHECK YES only if demanded in complaint: <b>JURY DEMAND:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>VIII. RELATED CASE(S) IF ANY</b>	(See Instruction):		JUDGE	DOCKET NUMBER
DATE:	SIGNATURE OF ATTORNEY OF RECORD			
	5/29/08			
<b>FOR OFFICIAL USE ONLY</b>				
RECEIPT #	AMOUNT	APPLYING IFP	JUDGE	MAG. JUDGE