

April 2, 2019  
204 Cleveland Lane  
Rockaway, NJ 07866

Morris County Superior Court  
Chancery Division, General Equity Part  
Washington & Court Streets  
Morristown, NJ 07960

RE: Paul Kardos vs. Fox Hills at Rockaway Condominium Association, Inc.  
Docket No.: MRS-C-102-18  
Notice of Motion

Dear Sir or Madam:

I am the *pro se* plaintiff in the above matter. Enclosed herewith please find the original and one (1) copy of:

- Notice of Motion for Leave of the Court to Amend Complaint
- Amended Complaint (proposed)
- Proposed Order for Leave of the Court to Amend Complaint

Please forward this to the Honorable Judge Berdote-Byrne.

Thank you for your courtesy and cooperation in this matter.

Very truly yours,



Paul Kardos  
973-527-1433  
[PKardos1@yahoo.com](mailto:PKardos1@yahoo.com)

Copy (via email and USPS regular mail):  
George Karousatos, Esq., Attorney for Defendant ([g.karousatos@bdlawfirm.com](mailto:g.karousatos@bdlawfirm.com))

Paul Kardos  
204 Cleveland Lane, Monroe Bldg.  
Rockaway, NJ 07866  
973-527-1433 cell  
Plaintiff *Pro Se*

<p>Paul Kardos</p> <p style="text-align: center;"><i>Plaintiff</i></p> <p style="text-align: center;">v.</p> <p>Fox Hills at Rockaway Condominium Association, Inc.</p> <p style="text-align: center;"><i>Defendant</i></p>	<p>Superior Court of New Jersey Chancery Division Morris County</p> <p>Docket No. MRS-C-102-18</p> <p style="text-align: center;">Civil Action</p> <p style="text-align: center;"><i>NOTICE OF MOTION FOR LEAVE OF THE COURT TO AMEND COMPLAINT</i></p>
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Please take notice that at 9 AM on April 26, 2019 or as soon thereafter as may be heard, the undersigned Plaintiff *pro se* Paul Kardos, will apply to the Court at Morris County Superior Court, Morristown, NJ, for Leave of the Court to Amend the Plaintiffs Complaint in accordance with N.J. Court Rules R. 4:9-1.

Please take further notice that the proposed Amended Complaint is enclosed:

Date: April 2, 2019

Signature



Paul Kardos

Paul Kardos  
204 Cleveland Lane, Monroe Bldg.  
Rockaway, NJ 07866  
973-527-1433 cell  
Plaintiff *Pro Se*

Paul Kardos  <i>Plaintiff</i>  v.  Fox Hills at Rockaway Condominium Association, Inc.  <i>Defendant</i>	Superior Court of New Jersey Chancery Division Morris County  Docket No. MRS-C-102-18  Civil Action  <i>ORDER FOR LEAVE TO AMEND COMPLAINT</i>
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THIS matter coming before the Court on application by Paul Kardos, Plaintiff *pro se*, and the Court having reviewed the (proposed) Amended Complaint dated April 2, 2019 in accordance with N.J. Court Rules R. 4:9-1,

IT IS ON this \_\_\_\_\_ day of April 2019

ORDERED that the Plaintiff has leave of the Court to amend the Complaint of September 20, 2018 against defendant, Fox Hills at Rockaway Condominium Association, Inc.; and

IT IS further ordered that a copy of this Order shall be served on all council of record within seven (7) days of its receipt by the Plaintiff.

\_\_\_\_\_  
Maritza Berdote-Byrne, J.S.C.

This motion was: \_\_\_ Opposed  
\_\_\_ Unopposed

CERTIFICATION OF SERVICE

I certify that on April 2, 2019, I sent a copy of the Notice of Motion, Amended Complaint and proposed Form of Order to the following by regular mail (USPS).

George Karousatos, Esq.  
Biancamano & DiStefano, P.C.  
10 Parsonage Road, Suite 300  
Edison, NJ 08837

*April 2, 2019*

Date:

*Paul Kardos*

Paul Kardos