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In this Edition

Litigation in the Electronic Age: Using Social Media to Your Advantage, *By Andria Kelly, Partner, Albertson office*

Conversation? Face-to-face discussions? Not unless you're skyping. Telephone… why talk when you can text? Handwritten invitations? Just post a Facebook invite instead. The way we communicate has changed in recent years with most people now using social media to publish their personal and private information.

The statistics are staggering. There are currently over 400 social media websites with new ones popping up every day. Twitter's monthly users grew to 284 million in 2014. There are currently over 1.39 billion active Facebook users worldwide. Instagram had 300 million active monthly users in 2014. YouTube has more than 4 billion views per day with over 300 hours of video being uploaded every minute. There is more video uploaded to YouTube in 60 days than the three major US networks created in 60 years.

Using the internet and social networking sites to communicate, to discuss, to opine, to convey, to reveal, to support, has now become the "fabric of our lives." Properly tapping into such sites can provide a wealth of information regarding a claimant, a witness, a client or a juror that can be useful in litigating a case.

<u>Claims investigation in the age of social media</u>

The information we can gain about a claimant or a party to litigation via social media is endless. Individuals have a tendency to admit more information in a Facebook or Instagram post than in an interpersonal setting. This information can often affect discovery, trial strategy and settlement.

What you learn about a witness through a social media search can be used to challenge character, credibility and damages. The issue is how you obtain the information. The New York State Bar Association has clearly held that an attorney may access and review the *public* records of any party to litigation to search for potential impeachment material.

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It is unethical, however, for an attorney to use deceit to gain access to private information that would otherwise be unobtainable. Specifically, the attorney, or his agent, cannot "friend" a party litigant to gain such access nor can they direct a third party to send a "friend" request. Inputting the claimant's or party's name into a Google search, however, is a reasonable means of finding out what social networking sites an individual is using and may likely reveal relevant public information that can be used to gain access to private posts, photographs and pages.

Discoverability

The best way to obtain access to a party's private social media pages is through good old fashioned discovery. Written discovery demands should ask for a list of the party's social networking sites, how long they have been on such sites, their user names and passwords. Document requests should ask for posts or messages related to the issues and damages in the suit. Witnesses should be questioned at their depositions regarding their social networking usage and whether they have posted any information regarding the lawsuit or the claims at issue.

Naturally, witnesses are not so willing to hand over unfiltered access to the private portions of their social networks. Thus, many of the social networking discovery demands are met with objections. If you are unable to reach an agreement with your adversary regarding the disclosure of the private portions of a plaintiff's social networking site, a motion to compel may be necessary. Such a motion will only be granted, however, where the activity contained in the public portions contradicts or is relevant to the claims made in the lawsuit. New York Courts have generally denied requests for access to a claimant's or adverse party's private pages where the request is nothing more than a fishing expedition with the hope of uncovering some relevant impeachment material.

The mere possession and utilization of a Facebook account by a plaintiff is insufficient to compel access to the private portions of the account. To warrant disclosure, the defendants must establish a factual predicate for their request identifying relevant information, i.e., information that "contradicts or conflicts with plaintiff's alleged restrictions, disabilities, and losses, and other claims." *Tapp v. New York State Urban Dev. Corp.*, 102 A.D.3d 620, 958 N.Y.S.2d 392 (1st Dept. 2013) (citations omitted). *Turner Constr. Co.*, 88 A.D.3d 617. The *Tapp* Court denied the defendant's discovery request holding that the "[d]efendant's argument that plaintiff's Facebook postings 'may reveal daily activities that contradict or conflict with' plaintiff's claim of disability amounts to nothing more than a request for permission to conduct a 'fishing expedition." *Id.*

In contrast, the Court in *Richards v. Hertz Corp.*, 100 A.D.3d 728, 953 N.Y.S.2d 654 (2d Dept. 2012) allowed the defendants access to the private portions of the plaintiff's social networking site via an in camera inspection based on the content displayed on her public pages. The *Richards* plaintiff alleged that she sustained injuries in a car accident that impaired her ability to play sports, and caused her to suffer pain that was exacerbated in cold weather. The defendants discovered photographs of the plaintiff skiing on her public Facebook pages that postdated the accident and demanded unfettered access to her Facebook account since the date of the accident. The plaintiff argued that disclosing her profile would violate her right to privacy.

The *Richards* Court ruled that the defendants made a sufficient showing that the private portions of plaintiff's Facebook account might contain evidence relevant to the defense of the lawsuit. The Court further held that the plaintiff's privacy concerns were outweighed by the defendant's need for such information. Clearly, the public portions of plaintiff's site contained material that was contrary to her claims. Thus, there was a reasonable likelihood that the private portions would contain further evidence with respect to her activities and enjoyment of life that was material and relevant to the defense of the case.

Admissibility

Whether you obtain information regarding a claimant or party litigant via their public pages or through proper access to their private pages, you need to preserve the information and make sure it is admissible evidence. The last thing you want is to have useful, relevant electronic evidence that is not admissible at trial.

The information obtained from social networking sites is subject to the standard rules of admissibility applied to all other traditional forms of evidence. The electronic evidence must be relevant; it must be authentic; if it is considered hearsay, there must be an applicable hearsay exception; it must be an original or a duplicate and if it is neither there must be admissible secondary evidence to prove its content; and lastly the probative value of the evidence must outweigh its unfair prejudice.

The best way to authenticate a social networking post is to have the individual who created the evidence authenticate it. Authentication can also be accomplished during discovery by questioning the individual at her deposition regarding the posts or serving a Notice to Admit. If the individual is not available, circumstantial evidence, including a combination of photographs, video comments, e-mail addresses, posting dates, and usage logs can be used to authenticate the evidence. Information obtained from social networking sites will likely be admitted into evidence so long as the standard rules of admissibility, including relevance and authentication, are satisfied.

Conclusion

The information obtained by investigating an individual's social network usage and profiles can dramatically impact the outcome of a case. Investigation should start early and continue during the course of the litigation. File handling strategy and trial strategy could all hinge on what is being posted on the internet. No electronic evidence, however, is good evidence unless the rules of ethics, discovery and admissibility are met.

ADM New Jersey Celebrates Fourteen Years of Success and Growth, *By Patrick Cooney, Partner, Albertson office and Michael Salvo, Partner, New Jersey office*

All it took was a 100 square foot office in Newark, New Jersey, one complex construction defect case and the grit and determination of **Michael C. Salvo** to launch ADM's venture into the Garden State.

April 1, 2015 marked the 14th anniversary of ADM's New Jersey office. The one complex construction defect case concluded with a defense verdict for our client after a six month trial in May 2004, quickly morphed into a three attorney office with support staff and a larger space in Madison, New Jersey.

Under the guidance of Michael C. Salvo, the managing partner of the New Jersey office, ADM began to grow its construction defect unit and developed a voluminous commercial auto program in New Jersey. By August 2005, just four years after its debut, the office grew to six attorneys in a 4,900 square foot office in Morristown, New Jersey. From there, ADM began to handle all lines of cases spanning from Sparta in the northwest New Jersey to Cape May in the southeast.

By May 2014, ADM had again outgrown its office space and moved into its current 6000 square foot space at 65 Madison Avenue in Morristown, New Jersey. The office now employs 17 people including nine attorneys and eight support staff and continues to handle cases throughout the entire State of New Jersey. Mr. Salvo oversees an extensive construction defect unit and commercial auto group as well as a number of dedicated attorneys who handle premises liability, professional liability, dram shop and other various actions including consumer fraud litigation and environmental litigation.

Contributing to the overall success of the New Jersey office is partner, **Christopher J. Conover**, whose trial experience and practice concentration on matters involving products liability, premises liability, construction defect and professional malpractice including medical, professional engineers, attorneys and title companies are an invaluable asset to the success of the office. Chris also handles matters involving New York State's complex Labor Law. In 2013, **Kira M. Martinez** joined the firm. Kira, who is fluid in Spanish, has over 12 years trial experience with a background in insurance defense, Title 59 defense, real estate and municipal matters. Assisting Mr. Salvo are associates **Michael Caldarella**, who handles all aspects of liability defense including construction defect, premises liability and product liability matters; **Danielle M. DeMarzo**, who works in association with the premises liability, healthcare litigation and toxic tort practice groups; **David E. Freed**, who concentrates his practice on construction defect cases, breach of contract, contractual indemnity and other construction related issues; **Brendan P. Lanigan** who focuses his practice on construction defect, premises liability, property damage and auto liability; and **Rachael E. Nole**, who assists the partners in general litigation and is involved in all aspects of discovery, trial preparation and motion practice.

The growth and success of the New Jersey office is supported with an impressive trial record with **70 percent of its trials resulting in defense verdicts** with a balance of verdicts resulting in favorable results for our clients.

***Cardascia's Corner* – Where the Co-Chair of the Appellate Unit, Nicholas Cardascia explains the Law Impacting the Defense Bar**

Defendants are entitled to wider discovery in Personal Injury actions where Plaintiff's claim "loss of enjoyment of life": In the Second Department, there is a body of cases where the court allowed the defendant to obtain authorizations relating to a wide range of plaintiff's pre-existing medical conditions. The trigger for permitting disclosure of the pre-existing records is the plaintiff's claim of loss of enjoyment of life. Where loss of enjoyment of life was alleged, the Second Department has permitted disclosure on plaintiff's pre-existing diabetes, mental health, and cardiac conditions. Based on these cases, an argument can be made for disclosure of most records – since the claimed injuries in these cases were not directly related to mental, endocrinal or cardiac health. *Amoroso v. City of New York*, 66 A.D.3d 618, 887 N.Y.S.2d 163 (2d Dep't 2009) (Since the nature and severity of the plaintiff's prior medical conditions may have an impact upon the amount of damages, if any, recoverable for a claim of loss of enjoyment of life, the records regarding those preexisting medical conditions are material and necessary to the defense of the case); *Vodoff v. Mehmood*, 92 A.D.3d 773, 938 N.Y.S.2d 472 (2d Dep't 2012); *Moreira v. M.K. Travel & Transp., Inc.*, 106 A.D.3d 965, 966 N.Y.S.2d 150 (2d Dep't 2013); *Bravo v. Vargas*, 113 A.D.3d 577, 978 N.Y.S.2d 313 (2d Dep't 2014).

$750,000 sustained for arthroscopic repair of a torn meniscus: *Reyes v. NYCTA*, the Appellate Division, First Department affirmed a Bronx County jury verdict for $750,000 for future pain and suffering. The decision does not provide plaintiff's age, but indicates that she injured her left knee. A laceration to the knee required 15 staples to close and she tore her medial meniscus. After two years of PT, she underwent arthroscopic surgery. She testified that she continued to experience pain, limped, and used a cane. Her surgeon testified that she would need a total knee replacement. She also had three bulging discs. The court also noted that plaintiff has difficulty standing and has been unable to return to work as a street vendor.

The Evolving Definition of Cleaning under Labor Law § 240: In another decision addressing the issue of what activity constitutes "cleaning" under Labor Law 240(1), the Appellate Division, First Department relied on the facts set forth by the Court of Appeals in *Soto v. J. Crew, Inc.*, 21 N.Y.2d 562 (2013) to determine that plaintiff was engaged in a "cleaning" activity under 240(1) when he was injured while applying masking tape to windows in preparation for stripping and relacquering the brass on the facade of the building. *Dorador v. Trump Place Condominium*, 2015 Slip Op 02423 (1st Dep't 2015).

First Department grants plaintiff summary judgment for fall while disassembling "complex" shelving system: In *Phillips v. Powercrat Corp.*, the First Department granted plaintiff summary judgment under Labor Law 240(1) and 241(6) where the plaintiff fell from an unsecured ladder in a warehouse while dismantling shelves. The court found dismantling on the shelves was sufficiently complex and difficult to render the shelving a "structure" under 240 and 241(6). The shelves ran from floor to ceiling across three walls, were each 50 feet long and 8 feet high and were bolted to the floors and walls.

Firm Results – Recent Trial Verdicts and Summary Judgment Wins Obtained By ADM Attorneys

Dantuono v. Holden: A Suffolk County jury recently non suited plaintiff in a dog bite case. In Dantuono v. Holden, a case tried by **Eugene Daneri**, partner, Bohemia office, an Avon lady claims she was bitten by Baxter, a 3 ½ year old Boston Terrier. Plaintiff was invited by our client into her home. Plaintiff saw Baxter gated in the kitchen and when our client, Mrs. Holohan entered the kitchen, Baxter got out. A minute later, the plaintiff entered the kitchen and advised Baxter had bitten her. She had a single puncture wound on the right side of her chin. She claimed that she, at 5'5" tall, was standing straight up when Baxter jumped up and bit her. She claims the dog continued with his attack but the only other injury sustained was a sprained index finger.

Prior to the trial, plaintiff's counsel h prosecuted a dangerous dog hearing wherein it was determined Baxter was a dangerous dog. Although Baxter was not euthanized, the judge imposed several restrictions on him.

During the trial, plaintiff testified that each of the five times she had been at the defendant's home, she heard Baxter barking, howling, growling and rattling a metal cage. She also testified that the defendant had a "Beware of Dog" sign on her front gate. Plaintiff's counsel introduced evidence that was confined to the kitchen, that Baxter had a metal cage and that the front porch was gated with a "Beware of Dog Sign". One of Ms. Holohan's neighbors described Baxter as a "jumper". Plaintiff's counsel also introduced testimony from Peter Borchelt, Ph.D. Dr. Borchelt conducted a videotaped evaluation of Baxter and he concluded that Baxter had vicious propensities and was not properly socialized.

After an hour and 20 minute deliberation, the jury returned a defendant's verdict finding Baxter did not have vicious propensities. Plaintiff was claiming injury to her trigeminal nerve with numbness and face drooping, the latter of which was confirmed by defendant's expert. Plaintiff's $300,000 demand reduced to $150,000 prior to trial. A $25,000 offer was rejected. Baxter had no comment.

Firm Results – Continued

Marshall Starkman v. City of Long Beach, et al.: The plaintiff brought suit against the City of Long Beach, the Long Beach Police Department and Police Officer Paul DeMarco for injuries he sustained when Officer DeMarco drove both the front and rear wheels of a LBPD SUV over the plaintiff's upper torso.

During a routine pre-season beach patrol, the officer's attention was drawn to an apparent emergency at the ocean's edge, and while making a wide turn, drove over the plaintiff. The officer testified that he was unaware that he had driven over the plaintiff due to the irregular surface of the beach sand. Prior to trial, plaintiff was awarded summary judgment on liability.

The plaintiff was medivacced to a trauma unit where the injuries included several fractured ribs and transverse process fractures. Subsequently, plaintiff underwent anterior and posterior cervical spine surgeries where a three level fusion was done. In addition, plaintiff had a cardiac ablation procedure for arterial fibrillations that developed after the accident. He also received ongoing psychological counseling for PTSD. Plaintiff never returned to his former employment as a manager of a T-Mobile store claiming he was totally and permanently disabled.

During the month long trial tried by **Henri Demers**, partner, Albertson Office, 12 experts testified. Plaintiff's experts testified he would need additional surgeries and rehabilitation. Defense experts testified at trial that the cervical fusion was performed above the injury level and that the spinal surgery was not necessary. Defense experts further testified that plaintiff did not suffer from PTSD and that plaintiff's arterial fibrillation condition was of unknown origin, did not cause any symptoms and was resolved. Video surveillance also revealed the plaintiff to have no apparent physical disabilities.

The plaintiff's initial settlement demand of $20 Million was reduced to $9 Million by the end of the trial. Our client's insurer offered $1 Million at mediation prior to trial and in response to the demand of the City of Long Beach, the insurer tendered the balance of its $3 Million policy.

At the close of evidence, plaintiff's counsel asked the jury to award $23.8 Million; the jury returned a verdict totaling $2.2 Million. A post trial motion to set aside the verdict was denied; plaintiff's counsel has appealed.

Singh v. Smith: Plaintiff, Yadvinder Singh, sustained multiple injuries when he fell approximately 30 feet from a ladder to a sub roof and from the sub roof to the driveway below.

A summary judgment application predicated upon the single family homeowner exception under the Labor Law had been denied. The Court found that based upon our client's work status as a contractor/construction manager and property manager and the fact that he provided the plaintiff with ladder(s) created issues of fact as to whether he exercised any direction, control or supervision over the plaintiff's work.

Our client had entered into an oral contract with the plaintiff's employer based upon their prior business relationship; therefore, no cause of action for contractual indemnity nor insurance coverage was available. We were, however, able to prosecute a third-party action for common law indemnity based upon the "grave injury" exception.

Plaintiff sustained a head trauma resulting in a left sided craniotomy and evacuation of a subdural hematoma; fractured skull, a TBI with cognitive dysfunction and seizure disorder, a fractured orbit/sinus, post traumatic cerebrovascular stoke and a fractured shoulder requiring surgery. The plaintiff never returned to work.

Following the close of evidence **Patrick Cooney,** partner, Albertson, moved on behalf of Mr. Smith for a directed verdict arguing the plaintiff did not establish, *prima facie*, the "exception to the exception" i.e., that Mr. Smith exercised direction, control and supervision of Mr. Singh's work and further, that the plaintiff was recalcitrant in failing to use available safety harnesses.

The Court found that Mr. Smith's status as a contractor/construction manager was not enough, by itself, to establish liability. Plaintiff's direct testimony was contradictory and disjointed as to how much, if any supervision Mr. Smith exercised over the plaintiff's work. The Court agreed with our argument that simply asking "what" work and "how" the work was going to be done and providing equipment (ladders) was insufficient to establish the "exception to the exception". The Court also found the plaintiff was recalcitrant by failing to use provided safety harnesses.

Kenny v. Turner Construction, et al: Plaintiff was injured when she slipped and fell on ice in the parking lot of the Federal Courthouse located in Central Islip, New York. Plaintiff alleged there was ongoing leakage in the garage that led to ice formation, a result of negligent construction and design.

Following depositions, **Melissa Manna** associate, Albertson successfully moved to have all claims against her client, Nelson and Pope Engineering dismissed. The Court found that the evidence including the contract and the deposition testimony clearly established that Nelson and Popes' work relating to the Courthouse did not involve the parking lot.

Firm Results – Continued

Newman v. RCPI Properties: The New York County Supreme Court denied **Vincent Ambrosino**'s (partner, New York City office) motion for summary judgment which sought to dismiss plaintiff's Complaint as it was evident that he was the "sole proximate cause" of his injuries. In Newman v. RCPI Properties, plaintiff was injured while exiting a loading dock platform. The plaintiff stepped off the platform onto a stack of milk crates even though there was a wall mounted ladder for use in exiting the platform. The milk crates collapsed causing plaintiff to fall. He sustained a torn meniscus with surgery and demonstrated a need for future knee replacement.

The Appeal was briefed by **Nicholas Cardascia**, partner, Albertson office, and argued by **Glenn Kaminska**, partner, Bohemia office. The First Department reversed the Supreme Court finding that plaintiff's choice to use the milk crates instead of the ladder was the sole proximate cause. The fact that the ladder may not have been visible due to trucks parked in the area was found irrelevant since plaintiff testified that he did not look for another means to get down from the dock.

Bizzle v. Douglas: The plaintiff, who had parked her vehicle, opened the driver's side door as our client was driving past. Our client's vehicle hit the door causing it to fall off. Although the plaintiff claimed that her door hit the right front bumper of our client's car, photos and measurements taken by the appraiser clearly indicated that the initial contact was to the right side of our client's van behind the passenger seat.

Plaintiff claimed an L5-S1 herniation with impingement, C3-4, C4-5, C5-6 and L3-4 bulges. Plaintiff also alleged a complete tear of the ACL, tear of the posterior horn of the medial meniscus, extensive tear of the posterior horn of the lateral meniscus of the left knee and a fracture deformity of the tibial rim of the left knee. Deposition testimony revealed that the plaintiff had been on Social Security Disability since 1991 due to a prior low back injury.

The defendant's neurological, orthopedic evaluations and film review were all negative. **Sean Hutchinson**, associate, Albertson office moved for summary judgment on liability arguing that the plaintiff caused the accident by opening her door into traffic when it was unsafe to do so in violation of VTL 1214 and upon threshold grounds arguing that the plaintiff did not sustain a serious injury as defined by Section 5102 et seq. of the NY Insurance Law. Judge Baisley granted Sean's motion on both grounds, dismissing the plaintiff's Complaint in its entirety.

Lectures and Presentations by ADM Attorneys

Thomas Montiglio, partner, Albertson office, was a featured lecturer at the Suffolk Academy of Law during a recent CLE entitled "Trial Practices, the CPLR and the Uniform Rules". Tom shared his acumen on the use of expert witnesses at trial.

Brian Donnelly, partner, New York City, recently shared his personal and acquired knowledge with the New York State Bar Association when he presented "Tavern Owner Liability, Bar Fights and Dram Shop Liability". Brian covered the historical significant of Dram Shop legislation, the current state of New York's Dram Shop Act and defense avenues including the proper training of employees, investigation, highlighting what defense counsel must do upon receipt of a Dram Shop case to mount a successful defense.

James Edwards, partner, New York City, recently lectured at the New York State Trial Lawyers Association on the perils of New York's Labor Law. Jim covered recent developments and hot button topics including who is a protected person; exceptions to the class of protected people; whether the activity plaintiff was engaged in is actually a covered activity; whether there is a Labor Law violation and how to mount a defense in a Labor Law action.

Of Interest – ADM and DANY

The Defense Association of New York was recently honored by the New York Law Journal for its diversity initiative. DANY, a non-profit organization, serving the defense bar across the state recently launched "Career Empowerment for Diverse Attorneys", a ten month long program providing participants with training in leadership and rainmaking skills. Of the 25 participants, the majority were women; 1/3 were attorneys of color; about 10 percent identified themselves as LGBT.

This program, underwritten and sponsored by defense firms like ***Ahmuty, Demers & McManus*** teaches lawyers how to develop a business plan, how to develop contacts, networks and appear on the radar of corporate risk managers in major corporations, as well as the more traditional insurance companies that would potentially bring new business to firms. DANY plans to follow up with participants over the next few years to measure the programs impact and the partner with affinity bar groups to sponsor similar programs.

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Ahmuty, Demers & McManus traces its origins to 1946. The Firm as it now exists was formed in 1983 and quickly evolved to its present size of more than seventy attorneys serving the legal needs of clients throughout New York and New Jersey. As experienced litigators with decades of proven results, our attorneys demonstrate daily the tenacity, creativity, energy and commitment required to defend the wide spectrum of complex legal issues that confront our clients.

Perhaps the best indication of the Firm's abilities and dedication to service is manifested by the fact that we have continued to represent many of the same clients over the years, despite management changes within those companies and corporations. As the Firm and its clientele continues to grow proportionately, the Firm remains committed to the core value of taking a personalized approach to the needs of our clients.

Clients of the Firm recognize the commitment of all Ahmuty, Demers & McManus attorneys to handle legal matters efficiently and expeditiously, while at the same time providing the highest quality legal representation at a reasonable cost. The Firm works closely with its clients, utilizing a team approach in the defense of legal matters. The Firm prides itself on understanding the needs and philosophy of our clients and is highly experienced in resolving cases through trial, early resolution, ADR or motion practice. Since no single approach is best suited for all clients or cases, this versatility is a benchmark of the Firm. The legal staff includes some of the finest trial and appellate lawyers in New York, thereby allowing Ahmuty, Demers & McManus to handle any case regardless of complexity.

With over eighty-five attorneys, Ahmuty, Demers & McManus is uniquely qualified to provide superior and cost effective legal services to all of our clients. Perhaps the best indication of the Firm's abilities and reputation is demonstrated through the long term relationships the Firm maintains, even when many of our clients have experienced management changes. Ahmuty, Demers & McManus is committed to diversity in all hiring practices.

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