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HAFSA FODA, a/k/a )  
SOFY FODA )

Plaintiff, )

vs. )

VALLEY HEALTH SYSTEM, INC., and )  
SIMON J. TSIOURIS, )

Defendants. )

**SUPERIOR COURT OF NEW JERSEY  
BERGEN COUNTY: CHANCERY DIV.**

Docket No. C-163-22

Civil Action

**ORDER TO SHOW CAUSE WITH  
TEMPORARY RESTRAINTS  
PURSUANT TO RULE 4:52**

THIS MATTER being brought before the Court by Josiah A. Contarino, Esq., attorney for Plaintiff Hafsa Foda, a/k/a Sofy Foda ("Plaintiff"), seeking relief by way of ~~temporary~~ *preliminary* restraints pursuant to R. 4:52, based upon the facts set forth in the verified complaint filed herewith; and it appearing that immediate and irreparable harm will probably result before notice can be given and a hearing held, and for good cause shown:

It is on this 2<sup>nd</sup> day of September, 2022, *ORDERED* that Defendants Valley Health System, Inc. and Simon J. Tsiouris appear and show cause before the Superior Court at the Bergen County Courthouse in Hackensack, New Jersey at 3 o'clock in the afternoon or as soon thereafter as counsel can be heard on the 22<sup>nd</sup> day of September, 2022, why an order should not be issued preliminarily enjoining and restraining Defendants, Valley Health System, Inc. and Simon J. Tsiouris, from:

- A. terminating Plaintiff's employment with Defendant Valley Health System, Inc.; and
- B. discriminating, harassing, or retaliating against Ms. Foda for engaging in activity protected by the New Jersey Law Against Discrimination ("NJLAD"), namely seeking a reasonable accommodation for her disability and filing the instant lawsuit.

And it is further *ORDERED* that pending the return date herein, Defendants Valley Health System, Inc. and Simon J. Tsiouris are temporarily enjoined and restrained from:

- A. terminating Plaintiff's employment with Defendant Valley Health System, Inc.; and
- B. discriminating, harassing, or retaliating against Ms. Foda for engaging in activity protected by the New Jersey Law Against Discrimination ("NJLAD"), namely seeking a reasonable accommodation for her disability and filing the instant lawsuit.

And it is further *ORDERED* that:

1. Defendants Valley Health System, Inc. and Simon J. Tsiouris may move to dissolve or modify the temporary restraints herein contained on two (2) days notice to Plaintiff's attorney.
2. A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon

★ Pending the return date, the Status quo must be maintained and defendants may not terminate plaintiff's employment.

the defendants personally within 7 days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

3. The Plaintiff must file with the Court her proof of service of the pleadings on Defendants no later than three (3) days before the return date.

4. Defendants shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by September 16, 2022. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. You must send a copy of your opposition papers directly to Judge Terejian whose address is 10 main st., room 421, New Jersey. You must also send a copy of your opposition papers to the Plaintiff's attorney whose name and address appears above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$ 0 and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.

5. The Plaintiff must file and serve any written reply to the Defendants' order to show cause opposition by September 21, 2022. The reply papers must be filed with the Clerk of the Superior Court in the County listed above and a copy of the reply papers must be sent directly to the chambers of Judge Terejian.

6. If the Defendants do not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the Plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

7. If the Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

8. Defendants take notice that the Plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be ~~filed~~<sup>filed</sup> with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$ 175 filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the Plaintiff's attorney whose name and address appear above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

*[continued on following page.]*

10. The Court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than ~~X~~ days before the return date.



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Edward A. Jerejian, P.J.Ch.