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Attorney for Plaintiffs

W.M.	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: WARREN COUNTY
Plaintiff,	:	
	:	DOCKET NO.: L-000135-13
-vs-	:	
	:	CIVIL ACTION
JOHN DOES 1-10; and the COUNTY OF	:	
WARREN,	:	
	:	
Defendants.	:	

C.C.	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: WARREN COUNTY
Plaintiff,	:	
	:	DOCKET NO.: L-000017-15
-vs-	:	
	:	
JOHN DOES 1-10 and the COUNTY OF	:	
WARREN	:	CIVIL ACTION
	:	
Defendants.	:	

R.M.	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: WARREN COUNTY
Plaintiff,	:	
	:	DOCKET NO.: L-00328-16
-vs-	:	
	:	
ESTATE OF JOHN DOE; JOHN DOES	:	
1-100; JANE DOES 1-100 and the	:	CIVIL ACTION
COUNTY OF WARREN,	:	
	:	
Defendant.	:	

**JOINT STIPULATION AS TO LIABILITY FOR DEFENDANT, EDWARD BULLOCK
AND/OR THE ESTATE OF EDWARD BULLOCK**

The Estate of Edward Bullock by and through its administrator, Carl A. Bullock, Sr. (“Defendant Bullock”) and Plaintiff, W.M., Plaintiff, C.C. and Plaintiff R.M. (collectively “Plaintiffs”) hereby enter into the following joint stipulation as to liability in these matters:

BACKGROUND

1. Plaintiff, W.M., filed this action in or about April 2013 against Warren County and former Sheriff of Warren County, Edward Bullock, under docket number L-135-13. The following claims were asserted against former Sheriff Bullock directly:
 - In Count I, W.M. asserts a claim against Edward Bullock for violation of the Child Sexual Abuse Act (N.J.S.A. 2A:61B-1) for “sexual abuse”.
 - Count II sets forth a common law claim for “battery/assault” against Edward Bullock.
 - Count III sets forth a claim for “intentional infliction of emotional distress” against Edward Bullock.
 - Count IV sets forth a claim for “negligence *per se*” against Edward Bullock, for violating various portions of the Criminal Code.
 - Count V sets forth a claim for “negligence and breach of fiduciary duty” against Edward Bullock.

2. Plaintiff, C.C., filed this action in or about June 2015 against Warren County and former Sheriff of Warren County, Edward Bullock, under docket number L-17-15. The following claims were asserted against former Sheriff Bullock directly:
 - Count I sets forth a claim under the Child Sexual Abuse Act (N.J.S.A. 2A:61B-1) for “sexual abuse” against former Sheriff Bullock.
 - Count II sets forth a common law claim for “battery/assault” against Sheriff Bullock.
 - Count III sets forth a claim for “intentional infliction of emotional distress” against Sheriff Bullock.
 - Count IV sets forth a claim for “negligence *per se*” against Sheriff Bullock.
 - Count V sets forth a claim for “negligence and breach of fiduciary duty” against Sheriff Bullock.

3. Plaintiff, R.M. filed this action in or about November 2016 against Warren County and former Sheriff of Warren County, Edward Bullock, under docket number L-328-16. The following claims were asserted against former Sheriff Bullock directly:

- In Count I, R.M. sets forth a claim under the Child Sexual Abuse Act (N.J.S.A. 2A:61B-1) for “sexual abuse” against former Sheriff Bullock.
 - Count II sets forth a claim for “battery/assault” against Sheriff Bullock.
 - Count III sets forth a claim for “intentional infliction of emotional distress” against Sheriff Bullock.
 - Count IV sets forth a claim for “negligence *per se*” against Sheriff Bullock.
 - Count V sets forth a claim for “negligence and breach of fiduciary duty” against Sheriff Bullock.
4. From the early 1980s through 1992, Edward Bullock was the Sheriff of the County of Warren.
5. As discovery has revealed in these matters, during his tenure as Sheriff, numerous County officials were concerned with Edward Bullock’s inappropriate contacts with minor children within the County’s custody and control.
6. On November 18, 1991, three (3) State Police Investigators confronted the then Sheriff Edward Bullock in the boiler room of the Warren County Courthouse regarding his inappropriate contacts with minor children within the County system.
7. At that time, Sheriff Bullock admitted to sexually molesting several minor children in the “county system”. He also expressly acknowledged that “had it not been for his position as Warren County Sheriff and his using that position to cultivate the boys, he would have never met the previously mentioned boys and would not have engaged in sexual activity with them”. *See* State Police Investigation Report of Detective Robert Hoever dated December 1, 1991.
8. On or about March 11, 1992, Bullock pled guilty to the criminal charges of official misconduct stemming from an undercover investigation whereby Defendant Bullock was sexually soliciting underage males via the utilization of his employment and status as Warren County Sheriff.

9. As part of his plea, Bullock also resigned as Sheriff and was incarcerated.
10. On or about November 16, 2015, Edward Bullock died. Carl A. Bullock Sr. was appointed as administrator of the Estate by the Ocean County Surrogate's Office.
11. In that capacity, the Estate hired Scott Wilhelm, Esquire to defend its interests in each of these three (3) matters.

STIPULATION AS TO LIABILITY

12. The Estate of Edward Bullock, by and through counsel have directly participated in, or have been given notice of, all filings, proceedings, depositions and discovery in each of these three (3) consolidated cases.
13. After careful consideration of the claims in each of these suits, the Estate of Edward Bullock now wishes to withdraw its Answer and Defenses and stipulate as to liability for all common law and statutory claims asserted by the Plaintiffs in each of these matters.
14. In particular, as to the matter entitled W.M. v. The Estate of Edward and the County of Warren, Docket Number L-135-13, the Estate of Edward Bullock hereby agrees to stipulate as to all issues of liability as set forth in Counts I, II, II, IV and V.
15. In particular, as to the matter entitled C.C. v. The Estate of Edward and the County of Warren, Docket Number L-17-15, the Estate of Edward Bullock hereby agrees to stipulate as to all issues of liability as set forth in Counts I, II, II, IV and V.
16. In particular, as to the matter entitled R.M. v. The Estate of Edward and the County of Warren, Docket Number 328-16, the Estate of Edward Bullock hereby agrees to stipulate as to all issues of liability as set forth in Counts I, II, II, IV and V.

17. In the interest of efficiency and judicial economy, the Estate of Edward Bullock hereby stipulates as to all issues of liability and waive its right to contest liability at trial.

18. The Estate of Edward Bullock agrees to the entry of judgment upon the Counts designated in ¶¶ 14-16 above, and to be bound by damages therefrom, as determined by a jury at trial or a judge in a proof hearing.

19. This Agreement shall serve as an admission of liability on the part of Edward Bullock and/or the Estate of Edward Bullock in each of these matters.

20. Accordingly, the amount of the three (3) individual Plaintiffs claim for damages as outlined in each of the Complaints, shall be resolved by jury if the matter moves to trial, or a judge at a proof hearing if the matter can be disposed of without the necessity of a trial.

21. The Estate of Edward Bullock hereby agrees to produce, within ninety (90) days hereof, an accounting of all assets of the Estate of Edward Bullock.

ENTIRE AGREEMENT

22. This Stipulation shall constitute the entire agreement between the signing parties on all matters of liability, and no other statement, promise, or agreement, either written or oral, made by any of the parties or agents of any of the parties, that is not contained in this written consent decree, stipulation as to liability and order, shall be enforceable.

SEVERABILITY

27. If any term of this Stipulation is determined by any court to be unenforceable, all other terms of this consent decree and order shall nonetheless remain in full force and affect.

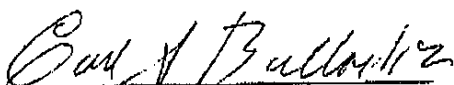
SIGNATORIES BIND PARTIES

28. Signatories on behalf of the parties represent that they are authorized to bind the parties to this Stipulation. This agreement may be signed in counterparts and a facsimile or email signature have the same force and effect as an original signature.

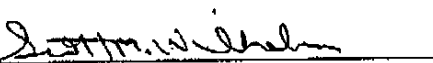
AGREEMENT BINDING SUCCESSORS

29. The parties agree that the terms of this stipulation shall bind them as well as their heirs, assigns and successors and interest.

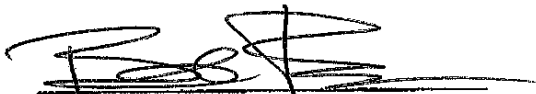
WHEREFORE, the Estate of Edward Bullock and the three (3) individual Plaintiffs in these matters, hereby agree and stipulate to the Court's entry of this Joint Stipulation.


The Estate of Edward Bullock
Administrator, Carl A. Bullock, Sr.


March 2, 2020
Date


Scott Wilhem, Esquire
Counsel for the Estate of Edward Bullock


MARCH 2, 2020
Date


W.M., by and through his legal counsel,
Brad M. Russo, Esquire

3/3/20
Date


C.C., by and through his legal counsel,
Brad M. Russo, Esquire

3/3/20
Date


R.M., by and through his legal counsel,
Brad M. Russo, Esquire

3/3/20
Date