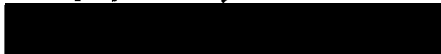


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ATTORNEY GENERAL OF NEW JERSEY  
Division of Law  
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P.O. Box 45029  
Newark, New Jersey 07101  
Attorney for Plaintiffs

**FILED**

**AUG 01 2012**

**Harry G. Carroll  
J.S.C.**

By: Lorraine K. Rak / Nicholas Kant  
Deputy Attorneys General  


SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION, BERGEN COUNTY  
DOCKET NO. BER-C-225-12

JEFFREY S. CHIESA, Attorney General of the State  
of New Jersey, and ERIC T. KANEFSKY, Acting  
Director of the New Jersey Division of Consumer  
Affairs,

Civil Action

Plaintiffs,

v.

AAA RELIABLE, INC. d/b/a RELIABLE, INC.; OLD  
RELIABLE CONSTRUCTION LIMITED  
LIABILITY COMPANY a/k/a OLD RELIABLE  
CONSTRUCTION and d/b/a RELIABLE, INC.;  
SULEJMAN LITA a/k/a SUL LITA, individually and  
as owner, officer, director, manager, employee,  
representative and/or agent of AAA RELIABLE, INC.  
and OLD RELIABLE CONSTRUCTION LIMITED  
LIABILITY COMPANY and d/b/a RELIABLE, INC.;  
JANE AND JOHN DOES 1-20, individually and as  
owners, officers, directors, shareholders, founders,  
managers, agents, servants, employees, representatives  
and/or independent contractors of AAA RELIABLE,  
INC. and/or OLD RELIABLE CONSTRUCTION  
LIMITED LIABILITY COMPANY; and XYZ  
CORPORATIONS 1-20,

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

Defendants.

THIS MATTER being brought before the Court by Lorraine K. Rak and Nicholas Kant, Deputy Attorneys General, Consumer Fraud Prosecution Section, for plaintiffs Jeffrey S. Chiesa, Attorney General of the State of New Jersey, and Eric T. Kanefsky, Acting Director of the New Jersey Division of Consumer Affairs (collectively, APlaintiffs@), seeking relief by way of temporary restraints, pursuant to R. 4:52, based upon facts set forth in the Verified Complaint and supporting Certifications and Brief filed herewith; and it appearing that immediate and irreparable damage will probably result before notice can be given and a hearing held and for good cause shown.

It is on this 8/15 day of July, 2012 **ORDERED** that defendants AAA Reliable, Inc. d/b/a Reliable, Inc. ("AAA Reliable"); Old Reliable Construction Limited Liability Company a/k/a Old Reliable Construction and d/b/a Reliable, Inc. ("Old Reliable Construction"); Sulejman Lita a/k/a Sul Lita, individually and as owner, officer, director, manager, employee, representative and/or agent of AAA Reliable, Inc. and Old Reliable Construction Limited Liability Company and d/b/a Reliable, Inc. ("Lita") (collectively, "Defendants") appear and show cause before the Superior Court, Chancery Division, General Equity Part, Bergen County, Hackensack, New Jersey at 9:00 o'clock in the forenoon or as soon thereafter as counsel can be heard, on the 10<sup>th</sup> day of September, 2012, why an Order should not be issued preliminarily enjoining and restraining Defendants from:

- A. Engaging in, continuing to engage in, or doing any acts or practices in violation of the New Jersey Consumer Fraud Act, N.J.S.A. 56:8-1 et seq. ("CFA"), the Contractors' Registration Act, N.J.S.A. 56:8-136 et seq., the Regulations Governing Home Improvement Practices, N.J.A.C. 13:45A-16.1 et seq. ("Home Improvement Regulations"), the Regulations Governing Contractor Registration, N.J.A.C. 13:45A-17.1 et seq. ("Contractor Registration Regulations"), and/or the Regulations Governing General Advertising, N.J.A.C. 13:45A-9.1 et seq. (AAdvertising Regulations@), including, but not limited to, the acts and practices alleged in the Verified Complaint;

- B. Engaging in the sale and/or performance of home improvements;
- C. Engaging in the offering for sale and/or advertisement of home improvements, whether through their Internet website, www.aaareliable.com ("AAA Reliable Website") or through any other Internet website, direct mailings, publications (e.g., newspapers, magazines, telephone books), unsolicited telephone calls and/or door-to-door solicitations;
- D. Removing, selling, encumbering, transferring or engaging in any act of disposition of any assets of the Defendants that relate to the subject matter of the Verified Complaint including, but not limited to, deposits or monies paid by consumers for home improvements;
- E. Destroying, concealing, altering, transferring, disposing or removing in any manner, directly or indirectly, any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a), in their possession, subject to their control or available to them, that directly or indirectly relate to the advertisement, offering for sale, sale and/or performance of home improvements; and
- F. Failing to make and/or keep any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a) that directly or indirectly relate to the advertisement, offering for sale, sale and/or performance of home improvements.

**AND IT IS FURTHER ORDERED** that on the return date herein, Defendants appear and show cause why an Order should not be issued:

- A. Freezing all assets of Defendants in which they hold a legal or equitable interest including, but not limited to, real property, securities, bonds, notes and monies held in any of their bank accounts, money market accounts, certificates of deposit or safe deposit boxes or held in petty cash, and preventing Defendants from removing, selling, encumbering, assigning, transferring or engaging in other acts of disposition of any such assets;
- B. Appointing a Receiver, at the Defendants' expense, in accordance with N.J.S.A. 56:8-8 and 56:8-9, to assume control over the assets of Defendants, render a full accounting and thereafter sell and/or convey such assets under the direction of the Court in order to restore any person who has suffered damages, whether named in the Verified Complaint or not, as a result of the unlawful acts of Defendants;

- C. Ordering Defendants, or any third party receiving a copy of this Order, to arrange for the shut down of AAA Reliable Website;
- D. Continuing any temporary restraints directed by the Court; and
- E. Granting such other relief as the Court deems equitable and just.

**AND IT IS FURTHER ORDERED** that pending the return date herein, AAA Reliable and Old Reliable Construction are temporarily enjoined and restrained from:

- A. Engaging in, continuing to engage in, or doing any acts or practices in violation of the CFA, N.J.S.A. 56:8-1 et seq., the Contractors' Registration Act, N.J.S.A. 56:8-136 et seq., the Home Improvement Regulations, N.J.A.C. 13:45A-16.1 et seq., the Contractor Registration Regulations, N.J.A.C. 13:45A-17.1 et seq., and/or the Advertising Regulations, including, but not limited to, the acts and practices alleged in the Verified Complaint;
- B. Engaging in the sale and/or performance of home improvements;
- C. Engaging in the offering for sale and/or advertisement of home improvements, whether through the AAA Reliable Website or through any other Internet website, direct mailings, publications (e.g., newspapers, magazines, telephone books, except current Yellow Pages), unsolicited telephone calls and/or door-to-door solicitations;
- D. Removing, selling, encumbering, transferring or engaging in any act of disposition of any assets of AAA Reliable and Old Reliable Construction that relate to the subject matter of the Verified Complaint including, but not limited to, deposits or monies paid by consumers for home improvements, except for a weekly salary of \$500 (gross) to Liman Lita and any business expenses deemed appropriate by the Plaintiffs, in accordance with subpart B below;
- E. Destroying, concealing, altering, transferring, disposing or removing in any manner, directly or indirectly, any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a), in their possession, subject to their control or available to them, that directly or indirectly relate to the advertisement, offering for sale, sale and/or performance of home improvements; and
- F. Failing to make and/or keep any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a) that directly or indirectly relate to the advertisement, offering for sale, sale and/or performance of home improvements.

**AND IT IS FURTHER ORDERED** that pending the return date herein:

- A. AAA Reliable shall arrange for the shut down of the AAA Reliable Website by 5:00 p.m. on August 2, 2012;
- B. AAA Reliable shall place a voicemail message on all of its telephone numbers indicating that the company is not taking orders for and/or performing home improvements at this time;
- C. AAA Reliable shall cancel any contracts and/or agreements for future advertisements in direct mailings and publications (e.g., newspapers, magazines, telephone books);
- D. AAA Reliable shall submit to Plaintiffs all bills and/or other documents reflecting any outstanding expenses which it deems payable, relating to day to day business of AAA Reliable and Plaintiffs shall advise AAA Reliable within five (5) business days of their receipt of the expense information as to whether Plaintiffs approve or reject payment of such expense;
- E. A temporary freeze be placed on all assets of AAA Reliable and/or Old Reliable Construction in which they hold a legal or equitable interest including, but not limited to, real property, securities, bonds, notes and monies held in any of their bank accounts, money market accounts, certificates of deposit or safe deposit boxes or held in petty cash, and that AAA Reliable, Old Reliable Construction and any third party with written notice of this Order be prevented from removing, selling, encumbering, assigning, transferring or engaging in other acts of disposition of any such assets, except for a weekly salary of \$500 (gross) to Liman Lita and any business expenses deemed appropriate by the Plaintiffs, in accordance with subpart D above;
- F. That within seven (7) days of being served with this Order, AAA Reliable and/or Old Reliable Construction shall provide copies of all consumer contracts pursuant to which they have provided home improvements since January 1, 2012 and shall provide copies of all government permits issued for each contract; and
- G. Within seven (7) days of being served with this Order, AAA Reliable and Old Reliable Construction shall provide Plaintiffs with their most recent federal and state income tax returns, with all accompanying schedules; all statements from January 1, 2012 to date, concerning any account (e.g. checking, savings) maintained by or on behalf of AAA Reliable and/or Old Reliable Construction at any bank or other financial institution; and all statements from January 1, 2012 to date, concerning any credit card[s] maintained by or on behalf of AAA Reliable and/or Old Reliable Construction.

**AND IT IS FURTHER ORDERED** that:

1. The Defendants may move to dissolve or modify the temporary restraints herein contained on two (2) days' notice to the Plaintiffs= attorney.
2. A copy of this Order to Show Cause, Verified Complaint, Brief and supporting Certifications submitted in support of this application shall be served upon the Defendants personally (or by other means ) within 3 days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.
3. The Plaintiffs must file with the Court their proof of service of the pleadings on the 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 August 20, 2012. 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 Harry G. Carroll, whose address is Superior Court of New Jersey, Chancery Division, General Equity Part, Bergen County, 10 Main Street, Hackensack, New Jersey 07601. You must also send a copy of your opposition papers to Plaintiffs' 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 \$\_\_\_\_\_ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief Plaintiffs are seeking.
5. Plaintiffs may file and serve any written reply to the Defendants= Order to Show Cause opposition by September 4, 2012. 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 Harry G. Carroll.

6. If Defendants do not file and serve opposition to this Order to Show Cause, their application will be decided on the papers on the return date and relief may be granted by default, provided that Plaintiffs file a proof of service and a proposed form of Order at least three (3) days prior to the return date.

7. If Plaintiffs have 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 Plaintiffs have 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 thirty-five (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 with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$ \_\_\_\_\_ filing fee payable to the ATreasurer State of New Jersey. You must also send a copy of your Answer to Plaintiffs= 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 Plaintiffs demand.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of the Legal Services offices in New Jersey is provided. If you do not have an attorney and are both 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.

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 3 days before the return date.

  
HON. HARRY G. CARROLL, J.S.C.



**ATLANTIC COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Division, Direct Filing  
1201 Bacharach Blvd., First FL  
Atlantic City, NJ 08401

**LAWYER REFERRAL**  
(609) 345-3444  
**LEGAL SERVICES**  
(609) 348-4200

**BERGEN COUNTY:**  
Deputy Clerk of the Superior Court  
Case Processing Section, Room 119  
Justice Center, 10 Main St.  
Hackensack, NJ 07601-0769

**LAWYER REFERRAL**  
(201) 488-0044  
**LEGAL SERVICES**  
(201) 487-2166

**BURLINGTON COUNTY:**  
Deputy Clerk of the Superior Court  
Central Processing Office  
Attn: Judicial Intake  
First Fl. Courts Facility  
49 Rancocas Rd.  
Mt. Holly, NJ 08060

**LAWYER REFERRAL**  
(609) 261-4662  
**LEGAL SERVICES**  
(609) 261-1088

**CAMDEN COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Processing Office  
1st Fl., Hall of Records  
101 S. Fifth St.  
Camden, NJ 08103

**LAWYER REFERRAL**  
(856) 964-4520  
**LEGAL SERVICES**  
(856) 964-2010

**CAPE MAY COUNTY:**  
Deputy Clerk of the Superior Court  
9 N. Main Street  
Box DN-209  
Cape May Court House, NJ 08210

**LAWYER REFERRAL**  
(609) 463-0313  
**LEGAL SERVICES**  
(609) 465-3001

**CUMBERLAND COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Case Management Office  
Broad & Fayette Sts., P.O. Box 615  
Bridgeton, NJ 08302

**LAWYER REFERRAL**  
(856) 692-6207  
**LEGAL SERVICES**  
(856) 451-0003

**ESSEX COUNTY:**  
Deputy Clerk of the Superior Court  
50 West Market Street  
Room 131  
Newark, NJ 07102

**LAWYER REFERRAL**  
(973) 622-6207  
**LEGAL SERVICES**  
(973) 624-4500

**GLOUCESTER COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Case Management Office  
Attn: Intake  
First Fl. Court House  
1 North Broad Street, P.O. Box 129  
Woodbury, NJ 08096

**LAWYER REFERRAL**  
(856) 848-4589  
**LEGAL SERVICES**  
(856) 848-5360

**HUDSON COUNTY:** Deputy Clerk of the Superior Court  
Superior Court, Civil Records Dept.  
Brennan Court House-- 1st Floor  
583 Newark Ave.  
Jersey City, NJ 07306

**LAWYER REFERRAL**  
(201) 798-2727  
**LEGAL SERVICES**  
(201) 792-6363

**HUNTERDON COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Division  
65 Park Avenue  
Flemington, NJ 08822

**LAWYER REFERRAL**  
(908) 735-2611  
**LEGAL SERVICES**  
(908) 782-7979

**MERCER COUNTY:**  
Deputy Clerk of the Superior Court  
Local Filing Office, Courthouse  
175 S. Broad Street, P.O. Box 8068  
Trenton, NJ 08650

**LAWYER REFERRAL**  
(609) 585-6200  
**LEGAL SERVICES**  
(609) 695-6249

**MIDDLESEX COUNTY:**  
Deputy Clerk of the Superior Court  
Administration Building  
Third Floor  
1 Kennedy Sq., P.O. Box 2633  
New Brunswick, NJ 08903-2633

**LAWYER REFERRAL**  
(732) 828-0053  
**LEGAL SERVICES**  
(732) 249-7600

**MONMOUTH COUNTY:**  
Deputy Clerk of the Superior Court  
Court House  
71 Monument Park  
P.O. Box 1269  
Freehold, NJ 07728-1269

**LAWYER REFERRAL**  
(732) 431-5544  
**LEGAL SERVICES**  
(732) 866-0020

**MORRIS COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Division  
30 Schuyler Pl., P.O. Box 910  
Morristown, NJ 07960-0910

**LAWYER REFERRAL**  
(973) 267-5882  
**LEGAL SERVICES**  
(973) 285-6911

**OCEAN COUNTY:**  
Deputy Clerk of the Superior Court  
Court House, Room 119  
118 Washington Street  
Toms River, NJ 08754

**LAWYER REFERRAL**  
(732) 240-3666  
**LEGAL SERVICES**  
(732) 341-2727

**PASSAIC COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Division  
Court House  
77 Hamilton St.  
Paterson, NJ 07505

**LAWYER REFERRAL**  
(973) 278-9223  
**LEGAL SERVICES**  
(973) 345-7171

**SALEM COUNTY:**  
Deputy Clerk of the Superior Court  
92 Market St., P.O. Box 18  
Salem, NJ 08079

**LAWYER REFERRAL**  
(856) 935-5628  
**LEGAL SERVICES**  
(856) 451-0003

**SOMERSET COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Division Office  
New Court House, 3rd Fl.  
P.O. Box 3000  
Somerville, NJ 08876

**LAWYER REFERRAL**  
(908) 685-2323  
**LEGAL SERVICES**  
(908) 231-0840

**SUSSEX COUNTY:**  
Deputy Clerk of the Superior Court  
Sussex County Judicial Center  
43-47 High Street  
Newton, NJ 07860

**LAWYER REFERRAL**  
(973) 267-5882  
**LEGAL SERVICES**  
(973) 383-7400

**UNION COUNTY:**  
Deputy Clerk of the Superior Court  
1st Fl., Court House  
2 Broad Street  
Elizabeth, NJ 07207-6073

**LAWYER REFERRAL**  
(908) 353-4715  
**LEGAL SERVICES**  
(908) 354-4340

**WARREN COUNTY:**  
Deputy Clerk of the Superior Court  
Civil Division Office  
Court House  
413 Second Street  
Belvidere, NJ 07823-1500

**LAWYER REFERRAL**  
(973) 267-5882  
**LEGAL SERVICES**  
(973) 475-2010