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CITY OF JERSEY CITY,

Plaintiff,

v.

HUDSON REGIONAL HEALTH, JOHN
and JANE DOES 1-10 and ABC
CORPORATIONS 1-10,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY

DOCKET NO. HUD-L-

Civil Action

VERIFIED COMPLAINT

Defendant Hudson Regional Health (“HRH”) plans to unlawfully close one of the last two remaining Emergency Departments in Jersey City—the second largest city in the state—at 7:00PM tonight. Without access, or with delayed access, to emergency care, Jersey City residents will suffer and maybe even die. In the interests of the health, safety, and wellbeing of Jersey City’s more than 300,00 residents, the City respectfully asks the Court to act now and prevent that tragedy.

Plaintiff, City of Jersey City, by way of Verified Complaint against the Defendant, Hudson Regional Health, says:

PARTIES

1. Plaintiff, City of Jersey City (“City”), is a municipal corporation of the State of New Jersey, with municipal offices at 280 Grove Street, Jersey City, New Jersey 07302, which has a statutory and common law interest in protecting public health and the safety and well-being of its residents.

2. Defendant, Hudson Regional Health (“HRH”), operates Heights University Hospital (“HUH”), also known as “Christ Hospital,” a general hospital within the City located at 176 Palisade Avenue.

FACTUAL BACKGROUND

3. Christ Hospital has provided essential medical services, including emergency medical care, to Jersey City residents for over one hundred fifty years.

5. After these one hundred fifty years of service, in September 2025, the hospital’s current operator, HRH, announced that it would suspend all non-essential services at Christ Hospital.

6. And now, without proper notice, HRH has announced its decision to close the last remaining medical services—the Emergency Department—at Christ Hospital at 7:00PM today.

7. Christ Hospital is one of only two hospitals serving Jersey City’s population of over 300,000 residents. A population of this size requires a minimum of 700 or more hospital beds; Jersey City Medical Center, the only other hospital in Jersey City, has no more than 350.

8. The closure of Christ Hospital would leave the entire city dangerously underserved, with devastating consequences for emergency response times, maternal care, and the health outcomes of the community in the Heights neighborhood and beyond.

9. The patients who depend on HRH for medical services are some of the most vulnerable in the Jersey City community: HRH has indicated that the majority of its patients are on Medicaid, are undocumented, are on charity care, or self-pay.

10. If HRH closes the Emergency Department, in order to obtain emergency care, these individuals will need to travel out of their neighborhood and potentially even outside of the City in order to obtain care, given the limited capacity at the one other remaining hospital in the City.

Delays in access to emergency care can significantly reduce patient outcomes and even lead to death.

11. In closing the Emergency Department, HRH has failed to follow proper procedures, provide adequate notice to patients and the city, and ensure that the critical services currently provided by hospital will be replaced.

12. State regulations require that “closure of a general hospital requires a certificate of need and shall follow the full review process.” N.J.A.C. § 8:33-3.2(b). When a certificate of need is not necessary, “written notification shall be filed with the Department’s Office of Certificate of Need and Healthcare Facility Licensure, 30 days prior to the proposed closure of a facility or discontinuance of all of its services.” Id. These requirements ensure that essential medical services are not eliminated without proper justification and notice to the public and patients.

13. To date, Christ Hospital has never obtained a certificate of need and has never filed such written notification. Any closure is therefore unlawful.

14. Closing the hospital without following proper procedures will leave the City’s residents without sufficient access to emergency care, creating a profound risk to public health and safety for Jersey City and its residents.

15. “Any municipality may . . . enforce such other ordinances, regulations, rules, and by-laws not contrary to the laws of this state or of the United States, as it may deem necessary and proper for the good government, order and protection of persons and property, and for the preservation of the public health, safety and welfare of the municipality and its inhabitants, and as may be necessary to carry into effect the powers and duties conferred and imposed by this subtitle, or by any law.” N.J.S.A. 40:48-2.

16. The City hereby moves pursuant to this authority to preserve the public health, safety, and welfare of the municipality and its inhabitants by protecting access to essential emergency services for its residents.

COUNT I

Defendant's planned closure violates applicable state regulations governing hospital closures and the City seeks to vindicate its statutory interest in protecting residents' access to essential health services.

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Declare HRH's closure unlawful;
- b. Enjoin Defendant from closing the Emergency Department until they have complied with all statutory and regulatory obligations;
- c. Award Plaintiff its counsel fees and costs of this suit; and
- d. Grant such other relief as the Court deems just and equitable.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c), Sarah Michael Levine, Esq., is hereby designated as trial counsel for Plaintiff, City of Jersey City.

CERTIFICATION PURSUANT TO R. 4:5-1(b)(2)

Pursuant to R. 4:5-2, I hereby certify that I have no knowledge of any other pending action or proceeding concerning the subject matter of this action. I further certify that I know of no other party who should be joined within the action. I certify that the forgoing statements made by me are true. I am aware that I may be subject to punishment if any of the foregoing statements are willfully false.

Dated: March 14, 2026

Respectfully submitted,

**SARAH MICHAEL LEVINE
CORPORATION COUNSEL**

By: /s/ Sarah Michael Levine
Sarah Michael Levine
Corporation Counsel