

DEVON TYLER BARBER, Plaintiff, Pro Se
3536 Pacific Avenue, Unit A5
Atlantic City, New Jersey 08401
(609) 862-8808 | dTb33@PM.Me

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION – CIVIL PART

ATLANTIC COUNTY

Devon Tyler Barber,
Plaintiff,

v.

**Hamilton Township Police Department,
et al.,**
Defendants.

Docket No.: **ATL-L-003252-25**

CIVIL ACTION

CERTIFICATION OF SERVICE

I, **Devon Tyler Barber**, of full age, certify as follows:

1. I am the Plaintiff in the above-captioned matter, **ATL-L-003252-25**.
2. On **December 13, 2025**, I caused to be served the following documents (collectively, the “**Supplemental Submission**”):
 - (a) **Supplemental Certification of Devon Tyler Barber**, dated December 13, 2025;
 - (b) **Exhibit S-1** – Order Granting Fee Waiver, *Barber v. New Jersey Motor Vehicle Commission*, Docket No. **MER-L-002371-25** (Law Division, Mercer County), entered December 5, 2025;
 - (c) **Exhibit S-2** – October 22 and October 28, 2025 administrative hearing/stay request and formal demand concerning MVC Notice **SUS S0340-00372-001558**;
 - (d) **Exhibit S-3** – Request for Complete Administrative Record pursuant to OPRA and the common-law right of access, dated November 30, 2025.

3. Service of the Supplemental Submission was made **in good faith and pursuant to the New Jersey Court Rules** by the following methods:

- (a) **Electronic service by email**, using the same service addresses previously utilized and accepted in this matter, including the addresses used for service of the Verified Complaint, Order to Show Cause, Track Assignment Notice, and prior supplemental filings; and
- (b) The documents referenced above were also **filed with the Court via JEDS** on December 13, 2025.

4. This Certification is intended to confirm service of the Supplemental Submission only and does not waive, concede, or alter any position previously asserted by Plaintiff in this action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: **December 13, 2025**

/s/ **Devon Tyler Barber**
Devon Tyler Barber, Plaintiff, Pro Se
3536 Pacific Avenue, Unit A5
Atlantic City, New Jersey 08401
(609) 862-8808 | dTb33@PM.Me

Subject: ATL-L-003252-25 – Service of Supplemental Certification and Exhibits (Filed via JEDS)

From dTb33@pm.me <dTb33@pm.me>
To HTPD.Chief@hamiltonatlnj.gov, HTPD.ia@hamiltonatlnj.gov, sales@dirkesautoparts.com,
discovery_request@aclink.org, Public Information Officer<publicInformation@acpo.org>
CC centralmunicipalcourt@aclink.org, info@tillerstead.com
Date Saturday, December 13th, 2025 at 8:07 AM

Good day,

Please be advised that on **December 13, 2025**, I filed via **JEDS** a **Supplemental Certification in Support of Emergent Relief and Return of Unlawfully Retained Property** in the above-captioned matter, **ATL-L-003252-25**.

Attached for service, consistent with prior service in this matter, are the following documents (the “Supplemental Submission”):

1. **Supplemental Certification of Devon Tyler Barber**, dated December 13, 2025;
2. **Exhibit S-1** – Order Granting Fee Waiver, *Barber v. New Jersey Motor Vehicle Commission*, Docket No. **MER-L-002371-25** (Law Division, Mercer County), entered December 5, 2025;
3. **Exhibit S-2** – October 22 and October 28, 2025 administrative hearing/stay request and formal demand concerning MVC Notice **SUS S0340-00372-001558**;
4. **Exhibit S-3** – Request for Complete Administrative Record pursuant to OPRA and the common-law right of access, dated November 30, 2025.

These materials are submitted solely to supplement the Court’s consideration of **irreparable harm, proportionality, and equitable hardship**. No new claims are asserted.

Please confirm receipt for your records.

Respectfully,

/s/ **Devon Tyler Barber**

Devon Tyler Barber, Plaintiff, Pro Se
3536 Pacific Avenue, Unit A5
Atlantic City, New Jersey 08401
(609) 862-8808 | dTb33@PM.Me

Sent with [Proton Mail](#) secure email.

On Friday, December 12th, 2025 at 11:33 AM, dTb33@pm.me <dTb33@pm.me> wrote:

Good afternoon,

12/13/25, 8:07 AM

Please be advised that on **December 12, 2025**, via JEDS, I will file a **Verified Supplemental Motion for Declaratory and Interim Relief** in the matter of:

Barber v. Hamilton Township Police Department, et al.

Docket No. **ATL-L-003252-25**

Superior Court of New Jersey, Law Division – Atlantic County

Attached for service are the following two documents:

1. **Verified Application for Declaratory and Interim Relief (with Proposed Order and Certification of Service);** and
2. **Exhibit A – South Bound Brook Municipal Filings (Context Only)**, submitted solely to demonstrate the pendency and timing of Plaintiff's due-process challenge to the underlying municipal plea.

The South Bound Brook materials are provided **for notice and contextual purposes only** and are **not submitted for adjudication or review** by the Law Division.

This filing seeks **interim equitable relief only**, narrowly tailored to address ongoing and irreparable harm arising from continued reliance on a challenged MVC license suspension and derivative enforcement actions.

Please confirm receipt at your convenience.

Respectfully,

Devon Tyler Barber

Plaintiff, Pro Se

3536 Pacific Avenue, Apt. A5

Atlantic City, NJ 08401

(609) 862-8808

dTb33@PM.Me

Sent with [Proton Mail](#) secure email.

On Thursday, December 11th, 2025 at 9:26 AM, dTb33@pm.me <dTb33@pm.me> wrote:

Dear Counsel and Records Custodians:

Please be advised that today, **December 11, 2025**, I served the following supplemental materials in the matter *Barber v. Hamilton Township Police Department, et al., Docket No. ATL-L-003252-25*:

A unified, merged PDF, titled 'AMENDED Verified Complaint with Order to Show Cause.pdf', containing the full supplemental filing is attached, along with individual PDFs of each document for clarity and reference.

1. **Supplemental Verified Submission**
2. **Supplemental Certification of Devon Tyler Barber**
3. **Proposed Supplemental Order**
4. **Certificate of Service**
5. **Cover Letter Correspondence**

12/13/25, 8:07 AM

These documents were also filed with the Superior Court of New Jersey, Atlantic County, through the **New Jersey eCourts JEDS system**.

Service is made consistent with **R. 1:5-3** and my accompanying Certificate of Service.

Please confirm receipt for your records.

If any additional service method is required, kindly advise.

Respectfully,

/s/ Devon Tyler Barber

Plaintiff, Pro Se

3536 Pacific Avenue, A5

Atlantic City, NJ 08401

(609) 862-8808

info@tillerstead.com

POST-SCRIPT NOTICE TO MUNICIPAL PROSECUTOR

Re: State v. Devon Tyler Barber – Notice of Superior Court Proceedings Affecting Municipal Charges

Municipal Court: Hamilton Township / Central Municipal Court of Atlantic County

Dear Municipal Prosecutor:

Please accept this letter as formal notice that the legality of the **November 29, 2025 stop, seizure, and impoundment** underlying the municipal charges in *State v. Barber* is presently before the Superior Court, Law Division, under **Docket No. ATL-L-003252-25**, via a pending **Order to Show Cause with Temporary Restraints**.

The Superior Court is now examining:

- the constitutional validity of the stop;
- the absence of any 911/CAD/dispatch basis confirmed by the Atlantic County Prosecutor's Office;
- the absence of statutory authority for the impoundment;
- procedural irregularities, including lack of inventory, tow authorization, or chain-of-custody; and
- the extent to which the municipal charges may be fruit of the unlawful stop and impound.

Because the outcome of the Superior Court action may materially affect or completely resolve the municipal matter, I respectfully request:

1. **A voluntary stay** of the municipal proceedings pending the Superior Court's ruling; or
2. **A conference** to discuss resolution or dismissal in the interest of justice.

Please confirm whether the State intends to proceed at this time, given the pending Law Division litigation.

Thank you for your professional courtesy and attention.

12/13/25, 8:07 AM

Sent | dTb33@pm.me | Proton Mail

Respectfully,
/s/ Devon Tyler Barber
Defendant, Pro Se

Sent with [Proton Mail](#) secure email.

950.67 KB 6 files attached

Certification of Service Supplemental Submission.pdf 166.72 KB

Cover Letter Supplemental Filing Atlantic County.pdf 137.03 KB

Exhibit S3 OPRA Request Complete Administrative Record.pdf 158.44 KB

Exhibit S1 Fee Waiver Order Mercer County.pdf 64.21 KB

Supplemental Certification Devon Tyler Barber.pdf 152.92 KB

Exhibit S2 MVC Hearing Stay Request October Notices.pdf 271.35 KB

DEVON TYLER BARBER, Plaintiff, Pro Se
3536 Pacific Avenue, Unit A5
Atlantic City, New Jersey 08401
(609) 862-8808 | dTb33@PM.Me

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION – CIVIL PART

ATLANTIC COUNTY

Devon Tyler Barber,
Plaintiff,

v.

**Hamilton Township Police Department,
et al.,**
Defendants.

Docket No.: **ATL-L-003252-25**

CIVIL ACTION

**SUPPLEMENTAL CERTIFICATION OF
DEVON TYLER BARBER**

**(In Support of Emergent Relief and Return of
Unlawfully Retained Property)**

I, **Devon Tyler Barber**, of full age, hereby certify as follows:

1. I am the plaintiff in the above-captioned matter. I submit this Supplemental Certification to place before the Court a **prior judicial determination of indigency** entered by a sister vicinage of the Superior Court of New Jersey, which bears directly on the issues of **irreparable harm, proportionality, and equity** presently before this Court.
2. On or about **December 5, 2025**, in **Barber v. New Jersey Motor Vehicle Commission**, **Docket No. MER-L-002371-25** (Law Division, Mercer County), the Superior Court **granted my application for a fee waiver**, thereby **adjudicating me indigent** under New Jersey law.
3. That determination was made after judicial review of my financial circumstances, including my lack of income beyond public assistance, housing instability at the time of the underlying events, and inability to pay court-related costs.

4. I submit this information **not to relitigate** the Mercer County action, but solely to demonstrate that a court of competent jurisdiction has already found that I **lack the financial ability** to pay fees or costs without hardship.
5. The ongoing retention of my **2019 Volkswagen Passat (F35-VLP)**—and the continued accrual or conditioning of release upon payment of towing and storage fees—therefore imposes a **known and judicially recognized financial impossibility**, not a mere inconvenience.
6. The vehicle at issue is the same vehicle that was seized and impounded on **November 29, 2025**, giving rise to the claims pending in this matter. The continued deprivation of that vehicle:
 - deprives me of transportation necessary for employment as a licensed tradesman;
 - interferes with my ability to maintain recently secured housing;
 - and compounds the harm already suffered from the initial seizure.
7. In light of the prior indigency determination, any continued retention of the vehicle based on nonpayment of fees operates **punitively**, without regard to ability to pay, and aggravates the constitutional and equitable concerns raised in my Verified Complaint and emergent submissions. This determination further confirms that any procedural or financial noncompliance arising during the relevant period must be understood in light of adjudicated indigency, not willful disregard of legal obligations.
8. I respectfully submit that the Mercer County fee-waiver order is **highly relevant** to this Court's assessment of irreparable harm and the need for immediate relief, including the **return of my vehicle without conditioning release on payment of fees I have been adjudicated unable to pay** and is appropriately considered as a matter of judicial notice and equity.

9. In addition to the fee-waiver order referenced above, I have taken documented, good-faith steps to address and clarify the underlying administrative circumstances that contributed to the events of November 29, 2025, including formally requesting an administrative hearing and stay, issuing written demands for agency action, and seeking production of the complete administrative record through formal written requests.
10. These efforts were undertaken through established channels and prior to, or contemporaneously with, the filings in this matter, and are offered solely to demonstrate diligence, transparency, and non-willfulness—not to request this Court to adjudicate or revisit the merits of any separate administrative proceeding.
11. I respectfully submit that these documented compliance efforts further confirm that the ongoing deprivation of my vehicle, when combined with an adjudicated inability to pay escalating fees, constitutes immediate and irreparable harm and supports the limited emergent relief sought in this matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: 12/13/2025

/s/ **Devon Tyler Barber**
Plaintiff, Pro Se
3536 Pacific Avenue, Unit A5
Atlantic City, New Jersey 08401
(609) 862-8808 | dTb33@PM.Me

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – CIVIL PART
ATLANTIC COUNTY**
Docket No. ATL-L-003252-25

**TO: Clerk/Civil Part Case Management
(Submitted via JEDS)**

Re: ATL-L-003252-25 – Supplemental Submission in Support of Emergent Relief

Dear Civil Division Manager:

Date: 12/13/2025

Please accept for filing Plaintiff Devon Tyler Barber's **Supplemental Certification in Support of Emergent Relief and Return of Unlawfully Retained Property**, together with attached exhibits submitted solely to supplement the Court's evaluation of **irreparable harm, proportionality, and equitable hardship.**

This supplemental submission includes:

1. **Supplemental Certification of Devon Tyler Barber** (dated 12/13/2025);
2. **Exhibit S-1 – Mercer County Order for Waiver of Fees (Fee Waiver GRANTED, entered 12/05/2025, MER-L-002371-25)**
3. **Exhibit S-2 – October 22 and October 28, 2025 administrative hearing/stay request and formal demand concerning MVC Notice SUS S0340-00372-001558**
4. **Exhibit S-3 – OPRA / Common-Law Request for Complete Administrative Record (dated 11/30/2025)**

These materials are submitted **only** to document Plaintiff's adjudicated indigency and ongoing good-faith efforts to resolve administrative issues through formal channels, and to show why continued retention of the vehicle conditioned on escalating fees imposes immediate and irreparable harm.

Respectfully submitted,
/s/ Devon Tyler Barber
Devon Tyler Barber, Plaintiff Pro Se
3536 Pacific Avenue, Unit A5
Atlantic City, NJ 08401
(609) 862-8808 | dTb33@PM.Me