

BARBER, DEVON TYLER, **Plaintiff**, *Pro Se*
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway Township, Atlantic County, New Jersey
(609) 862-8808 — Tylerstead@ProtonMail.com

DEVON TYLER BARBER,
Plaintiff,

v.

JOHN W. TUMELTY and THE LAW
OFFICE OF JOHN W. TUMELTY,
Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ATLANTIC COUNTY

DOCKET NO.: ATL-L-002794-25

Civil Action

NOTICE OF FILING:

SECOND AMENDED COMPLAINT

TO: The **Honorable** Sarah B. Johnson, **J.S.C.**
Superior Court of New Jersey, Law Division
Atlantic County

PLEASE TAKE NOTICE that Plaintiff, **Devon Tyler Barber**, hereby files the attached **Second Amended Complaint** pursuant to Rule 4:9-1. This amendment is filed as of right prior to the entry of any responsive pleading and in further response to Defendants' pending ***Motion to Dismiss*** under Rule 4:6-2(e).

The **Second Amended Complaint** clarifies and amplifies Plaintiff's factual allegations, **separates conviction-dependent claims from independent claims**, and further demonstrates that **multiple tort, contract, and consumer-fraud causes of action** remain viable regardless of any *post-conviction proceedings*.

Plaintiff respectfully requests that the Court deem the pending ***Motion to Dismiss*** moot or, in the alternative, deny the *motion* for the reasons set forth in Plaintiff's concurrently filed **Brief in Opposition**.

Respectfully submitted,

s/ Devon Tyler Barber
DEVON TYLER BARBER
Plaintiff, Pro Se
Dated: 11/25/2025