

EMERGENCY ASSISTANCE

From Mallik_Rupan
To dTb33@pm.me
CC Cheatham_Helen
Date Tuesday, November 18th, 2025 at 10:39 AM

Good morning,

Mr. Devon Tyler,

I try to reach out your phone number several times but not success.

Please call me as soon as possible. My direct phone number is 609-348 -3001 ext-2675. My supervisor EXT is 2984. I discuss with My supervisor Mr.'s Cheatham about your situation . she suggests me agency going to arrange temporary placement for you.

Thank you

R.mallik

Service of Motion for Reconsideration – Barber v. NJ MVC (MER-L-002371-25)

From Tylerstead@ProtonMail.com <Tylerstead@protonmail.com>
To Jennifer Jaremback <Jennifer.Jaremback@law.njoag.gov>
Date Wednesday, November 19th, 2025 at 12:06 PM

Dear Deputy Attorney General Jaremback,

Good afternoon. Please accept my apologies—this filing was intended to be included in my earlier email, but the file was lost on a library computer and I had to recreate it.

Attached please find the **November 13, 2025 Order** denying Plaintiff's fee-waiver application, along with Plaintiff's **Motion for Reconsideration**, including the Notice of Motion, Certification, Proposed Order, and Proof of Service, served pursuant to **R. 1:5-1(a)**. The motion has also been submitted today through **JEDS** to the Mercer County Civil Part.

Thank you for your attention.

Respectfully,

Devon Barber

Plaintiff, Pro Se

325 E. Jimmie Leeds Rd., Suite 7-333

Galloway, NJ 08205

(609) 665-9350

Tylerstead@ProtonMail.com

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

On Friday, November 14th, 2025 at 3:00 PM, Devon Tyler Barber <Tylerstead@protonmail.com> wrote:

Deputy Attorney General Jaremback,

Please accept this email as service of Plaintiff's filings in

Barber v. New Jersey Motor Vehicle Commission, Docket No. MER-L-002371-25.

Attached are the following documents:

1. Unified Cover Letter and Filing Notice
2. Motion to Amend Verified Complaint
3. Motion for Reconsideration of Fee Waiver

These materials are being submitted simultaneously to the Mercer County Civil Division via JEDS pursuant to R. 1:5-1(a) and R. 1:5-2.

11/19/25, 12:07 PM

Sent | dTb33@pm.me | Proton Mail

Please confirm receipt at your convenience.

Respectfully,
Devon Tyler Barber
Plaintiff, Pro Se
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
Tylerstead@ProtonMail.com

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

On Thursday, November 13th, 2025 at 6:08 PM, Devon Tyler Barber <Tylerstead@protonmail.com> wrote:

Subject: Re: Suspension – Notice of Amended Complaint & Request for Paper-Based Discovery

Dear Deputy Attorney General Jaremback,

I acknowledge receipt of your November 13, 2025 email. After further review of the record and of New Jersey's civil-procedure rules, I have elected **not to pursue an administrative hearing** and will instead rely solely on the action presently pending in the Superior Court, Law Division, Mercer County.

Accordingly, please note the following:

1. **Amended Complaint** – Within the next few days I will file a **Verified Amended Complaint** that expressly:

- Withdraws the request for an MVC administrative hearing;
- Refines the statutory and constitutional claims (due-process, equal-protection, and statutory-interpretation violations); and
- Sets out the precise relief sought—including a declaratory judgment, injunctive relief, and damages.

The amended pleading will be served on the State in accordance with **N.J.R.C.P. 4:6-2**.

2. **Paper-Based Discovery** – I intend to rely on the court's **standard discovery schedule** rather than a joint conference. Accordingly, I request that MVC:

- a. **Preserve** all electronically stored information (ESI) and hard-copy records described below, consistent with Rule 4:6-2(e).
- b. **Produce** the following documents **upon the court's order** (or, if MVC wishes to avoid a formal order, within twenty (20) business days of the filing of the amended complaint):
 - All internal policies, manuals, directives, and standard operating procedures governing **submission of hearing-request or suspension-appeal filings** (including any electronic-submission guidelines, if any).
 - Complete logs, tracking records, and correspondence evidencing **every hearing-request submission** received by MVC—by mail, email, fax, or electronic portal—from **January 1, 2020 through the present**.
 - All communications between MVC and the New Jersey Department of Transportation (DOT) concerning the routing of hearing-request emails to DOT addresses.
 - The **chain-of-custody record** for the mailing of my own hearing-request (date mailed, date received, date scanned, docket entry, and any internal notes).
 - Any complaints, grievances, or internal investigations filed by other motorists alleging the same

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- "mail-only" filing requirement.
- Training materials, memos, or guidance provided to MVC staff on handling hearing-request submissions. Should any portion of the above be subject to a privilege claim, please furnish a **detailed privilege log** in accordance with Rule 4:6-2(c).
3. **No Conference Request** – I respectfully decline a scheduling conference. All discovery disputes, if any, will be presented to the court for determination. I anticipate that the judge will issue a discovery order after reviewing the pleadings; I will comply promptly with any such order.
 4. **Interim Relief** – Given the immediate hardship caused by the suspension (loss of employment, inability to obtain medical care, and severe financial strain), I will shortly move for a **preliminary injunction** (or a stay of enforcement) under **Rule 4:6-2(b)**. I ask that MVC refrain from taking any further adverse administrative action while the court considers that motion.
 5. **Preservation Notice** – Please treat this correspondence as a formal **litigation hold** notice. All relevant ESI, paper files, voicemail recordings, and metadata must be retained in their original form until the matter is fully resolved.

I will serve the amended complaint on the State within the statutory timeframe and will file a notice of service thereafter. Once the complaint is filed, I will file a **Request for Entry of Default** (if appropriate) and a **Motion for Discovery** consistent with the schedule set by the court.

Thank you for your attention to these matters. I look forward to the court's forthcoming orders and to receiving the documents described above in accordance with the applicable rules.

Respectfully,

/s/ *Devon Tyler Barber*
Plaintiff, Pro Se
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350 • Tylertstead@ProtonMail.com
Sent with [Proton Mail](#) secure email.

On Thursday, November 13th, 2025 at 5:31 PM, Jennifer Jaremback <Jennifer.Jaremback@law.njoag.gov> wrote:

Good evening Mr. Barber.

I am the Deputy Attorney General that has been assigned to represent the New Jersey Motor Vehicle Commission (NJMVC) in the above matter. I have received your Verified Complaint and Order to Show Cause. It appears that you are interested in obtaining an administrative hearing to challenge the suspension and a stay of the suspension pending the outcome of that hearing. MVC never received your hearing request. If looks like you emailed it to a DOT email address rather than mailing it to the correct address at the NJMVC. If indeed you are interested in a hearing and stay please mail your request to the address listed on the notice of

11/19/25, 12:07 PM

Sent | dTb33@pm.me | Proton Mail

suspension, which I have placed below. Also, please let me know if you are willing to resolve the complaint if MVC give you the administrative hearing and stay of the suspension.

Motor Vehicle Commission, Hearing Unit

PO Box 166

Trenton, NJ 08666-0166

Thank you. I look forward to hearing from you soon.

Jennifer R. Jaremback

Deputy Attorney General, Division of Law

New Jersey Department of Law & Public Safety

Richard J. Hughes Justice Complex

25 Market Street

PO Box 112

Trenton, NJ 08625-0112

T: (609)376-3300

E-Mail: Jennifer.Jaremback@law.nj.oag.gov

CONFIDENTIALITY NOTICE The information contained in this communication from the Office of the New Jersey Attorney General is privileged and confidential and is intended for the sole use of the persons or entities who are the addressees. If you are not an intended recipient of this e-mail, the dissemination, distribution, copying or use of the information it contains is strictly prohibited. If you have received this communication in error, please immediately contact the Office of the Attorney General at (609) 292-4925 to arrange for the return of this information.

1.68 MB 3 files attached

Exhibit B Denial Order.pdf 555.91 KB

Reconsideration of Fee Waiver Denial.pdf 599.05 KB

Original Fee waiver application.pdf 561.40 KB

Filed by:

Devon Tyler Barber, Plaintiff, *Pro Se*,
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
TylerStead@ProtonMail.com

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – MERCER COUNTY

DEVON TYLER BARBER,

Plaintiff,

v.

**NEW JERSEY MOTOR VEHICLE
COMMISSION,**

Defendant.

DOCKET NO.: MER-L-002371-25

NOTICE OF MOTION

To: Jennifer R. Jaremback

Deputy Attorney General, Division of Law
New Jersey Department of Law & Public Safety
Richard J. Hughes Justice Complex
25 Market Street, PO Box 112
Trenton, NJ 08625-0112
E-Mail: Jennifer.Jaremback@law.nj.gov

And to Mercer County Clerk's Office and Case Management Staff VIA JEDS Submission;

Please take notice that on the next available return date under **R. 1:6-2**, Plaintiff **Devon Tyler Barber**, pro se, shall move before this Court for **Reconsideration** of the Order entered **November 13, 2025**, which denied Plaintiff's Fee Waiver / In Forma Pauperis application.

Plaintiff relies on the attached Motion, Certification, and Proposed Order. **Plaintiff does not request oral argument unless the Court determines that it would assist in the disposition of this motion.**

Dated: 11/19/2025

s/ Devon Tyler Barber

Plaintiff, Pro Se

Filed by:

Devon Tyler Barber, Plaintiff, *Pro Se*,
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
TylerStead@ProtonMail.com

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION – MERCER COUNTY

DEVON TYLER BARBER,

Plaintiff,

v.

**NEW JERSEY MOTOR VEHICLE
COMMISSION,**

Defendant.

DOCKET NO.: MER-L-002371-25

**MOTION FOR
RECONSIDERATION OF
FEE-WAIVER DENIAL
(R. 4:49-2)**

Plaintiff, **Devon Tyler Barber**, respectfully moves for reconsideration of the Order entered **November 13, 2025**, denying his fee-waiver request.

1. Legal Basis

Reconsideration is warranted where the Court acted on a palpably incorrect or irrational basis or failed to consider competent, probative evidence.

Cummings v. Bahr, 295 N.J. Super. 374, 384 (App. Div. 1996).

The denial appears to have been issued without full consideration of Plaintiff's verified indigency and enrollment in county/state assistance programs.

2. Verified Indigency

Plaintiff certifies that:

- His original fee-waiver application was true and complete when submitted.

- He is **currently receiving General Assistance (GA), Emergency Assistance (EA), and SNAP benefits**, confirming indigency eligibility under standard IFP criteria and **N.J.A.C. 1:1-4.6(c)**.
- He has no disposable income and is actively engaged in a **vocational plan** to obtain certifications to stabilize and expand his New Jersey Home Improvement Contractor business.
- Payment of filing fees would materially interfere with his ability to meet basic subsistence needs.

3. Request for Relief

Plaintiff respectfully asks that the Court:

1. **Vacate** the November 13, 2025 fee-waiver denial;
2. **Grant** Plaintiff's Fee Waiver / IFP application; and
3. Grant such other relief as is just and equitable.

Respectfully submitted,

s/ Devon Tyler Barber

Filed by:

Devon Tyler Barber, Plaintiff, *Pro Se*,
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
TylerStead@ProtonMail.com

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION – MERCER COUNTY

DEVON TYLER BARBER,

Plaintiff,

v.

**NEW JERSEY MOTOR VEHICLE
COMMISSION,**

Defendant.

DOCKET NO.: MER-L-002371-25

**CERTIFICATION OF
PLAINTIFF**

I, **Devon Tyler Barber**, certify under penalty of perjury pursuant to **R. 1:4-4(b)** that the facts stated in the foregoing **Motion for Reconsideration** are true to the best of my knowledge and belief.

I understand that if any of these statements are willfully false, I may be subject to punishment.

Dated: 11/19/2025

s/ Devon Tyler Barber

Plaintiff, Pro Se

325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
TylerStead@ProtonMail.com

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – MERCER COUNTY**

DEVON TYLER BARBER,

Plaintiff,

v.

**NEW JERSEY MOTOR VEHICLE
COMMISSION,**

Defendant.

DOCKET NO.: MER-L-002371-25

PROPOSED FORM OF ORDER

ORDER GRANTING RECONSIDERATION AND FEE WAIVER

This matter having been opened to the Court by Plaintiff, **Devon Tyler Barber**, pro se, by Motion for Reconsideration of the Order entered November 13, 2025, and the Court having considered the submissions and good cause appearing;

IT IS on this ____ day of _____, 2025,

ORDERED that Plaintiff's Motion for Reconsideration is hereby **GRANTED**; and it is further

ORDERED that Plaintiff's Fee Waiver / In Forma Pauperis application is **GRANTED**; and it is further

ORDERED that the Clerk shall accept filings from Plaintiff in this matter without payment of fees.

HON. _____ J.S.C.

Filed by:

Devon Tyler Barber, Plaintiff, *Pro Se*,
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
TylerStead@ProtonMail.com

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – MERCER COUNTY

DEVON TYLER BARBER,

Plaintiff,

v.

NEW JERSEY MOTOR VEHICLE

COMMISSION,

Defendant.

DOCKET NO.: MER-L-002371-25

PROOF OF SERVICE

I, **Devon Tyler Barber**, certify as follows:

1. On **November 19, 2025**, I submitted through the New Jersey Judiciary **JEDS electronic filing system** a true and complete copy of the following documents in *Barber v. New Jersey Motor Vehicle Commission*, Docket No. **MER-L-002371-25**:
 - o Notice of Motion
 - o Motion for Reconsideration
 - o Certification of Plaintiff
 - o Proposed Form of Order
 - o Copy of the November 13, 2025 Fee-Waiver Denial Order as EXHIBIT B
2. On the same date, **November 19, 2025**, I served a true copy of the above-listed documents via **email** on counsel for Defendant:

Jennifer R. Jaremback, Deputy Attorney General

Division of Law – Appellate/Civil Section

New Jersey Department of Law & Public Safety

Richard J. Hughes Justice Complex

25 Market Street

PO Box 112

Trenton, NJ 08625-0112

Email: Jennifer.Jaremback@law.njoag.gov

3. Service was made by:

- **Electronic submission through JEDS** to the Mercer County Civil Division Clerk; and
- **Email service** on counsel for the Defendant.

I certify under penalty of perjury that the foregoing statements are true. I understand that if any of the above statements are willfully false, I may be subject to punishment.

Dated: 11/19/2025

s/ Devon Tyler Barber

Plaintiff, *Pro Se*,

325 E. Jimmie Leeds Rd., Suite 7-333

Galloway, NJ 08205

(609) 665-9350

TylerStead@ProtonMail.com

NOTICE: This is a public document. Do not enter personal identifying information on it, such as your full Social Security number, driver's license number, insurance policy number, vehicle plate number, active financial account, credit card number or military status. This document as submitted will be available to the public upon request.

Name Barber, Devon Tyler
 Address 325 E. JIMMIE LEEDS RD., STE., 7, 333,
GALLOWAY TOWNSHIP, NJ 08205

Telephone Number (609) 665-9350
 Email Address Tylerstead@ProtonMail.com

DEVON T. BARBER,

Plaintiff(s)/Appellant(s),

NEW JERSEY MOTOR VEHICLE
COMMISSION,
Defendant(s)/Respondent(s).

Superior _____ Court of New Jersey
Mercer County (if applicable)
 Docket Number: _____

Certification/Petition/Application in Support of a Fee Waiver

I/We, DEVON T. BARBER, am/are the
 (plaintiff(s)/ appellant(s)/ defendant(s)/ respondent(s)) in the above-captioned matter and
 I/we make this certification in support of my/our request for a filing fee waiver pursuant to *Rule 1:13-2* or *Rule 2:7-1*.

1. I/We am requesting this relief because I/we do not have sufficient funds or assets with which to pay the filing fees associated with this action.
2. I/We, am/ am not/ are/ are not an inmate in State prison or County Jail.*

***Attachments necessary:** If you are a state prison or county jail inmate, you must attach a certified copy of your prisoner's fund account statement from the appropriate correctional institution for the six months immediately preceding the date of this application. If you are requesting a waiver of the partial filing fee requirement set forth in N.J.S.A. 30:4-16.3, you must attach an affidavit of special circumstances.

3. I have been determined to be eligible for one or more of the following: (Check applicable boxes)
 - Public Assistance (please provide your most recent award statement as proof of eligibility);
 - Social Security Disability (please provide your most recent award statement as proof of eligibility)
4. Below is an accurate and full disclosure of my financial situation. I financially support 0 dependents (not including myself). (A dependent is an individual who is a child or relative who resides in the home and relies on you for more than half of his/her support for any given calendar year)

Attachments necessary:

Provide two months of documentation for the following:

- Welfare, Public Assistance, Unemployment, Disability, Social Security, Child Support/Alimony, other income.

Provide six months of bank statements for the following:

- All bank accounts.

5. I/we am/ am not/ are/ are not claimed as a dependent on someone else's tax return

Employer's Name, Address and Telephone Number:
N/A

Complete the Following Information:

Net Monthly Income	\$ 185.00	House(s)/Land Market Value	\$ 0.00
Spousal/Cohabitant Contribution	\$ 0.00	Value of All Motor Vehicles	\$ 0.00
Unemployment/Disability	\$ 0.00	Cash	\$ 21.00 <i>(dTb)</i>
Social Security	\$ 0.00	Current Balance Checking Accts.	\$ 0.00
Veterans Administration	\$ 0.00	Current Balance Savings Accts.	\$ 0.00
Pension	\$ 0.00	Civil Judgment Awards/Pending	\$ 0.00
Public Subsidies	\$ 0.00	Current Value of Stocks/Bonds	\$ 0.00
Child Support/Alimony	\$ 0.00	Face Value of CDs/IRAs/401Ks	\$ 0.00
Housing Subsidies	\$ 0.00	Money Market Accounts	\$ 0.00
Trust Fund Income	\$ 0.00	Retrievable Bail Amt. & Location	\$ 0.00
Income from Rental Properties	\$ 0.00	N/A	
		Other Assets N/A	\$ 0.00
Total Monthly Income	\$ 185.00	Total Assets	\$ 0.00

6. I/We understand that I/we am/are under a continuing obligation to notify the court of a change in my financial situation

Certification

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

I/We further certify that in accordance with Court Rule 1:38-7(b) all confidential personal identifiers have been redacted and that subsequent papers submitted to the court will not contain confidential personal identifiers.

11/04/2025

Date

S/ BY: DEVON TYLER BARBER

Print your name(s)

DEVON T. BARBER

Signature(s)

BY: X(Tb), Devon Tyler All Rights Reserved.
Hamilton Township, Atlantic County, New Jersey.

This fifth day of the eleventh Month,
this 2025 year A.D.

NOTICE: This is a public document. Do not enter personal identifying information on it, such as your full Social Security number, driver's license number, insurance policy number, vehicle plate number, active financial account, credit card number or military status. This document as submitted will be available to the public upon request.

Name Barber, Devon Tyler
 Address 325 E. JIMMIE LEEDS RD., STE., 7, 333,
GALLOWAY TOWNSHIP, NJ 08205

Telephone Number (609) 665-9350
 Email Address Tylerstead@ProtonMail.com

DEVON T. BARBER,

Superior Court of New Jersey
Mercer County (if applicable)
 Docket Number: _____

Plaintiff(s)/Appellant(s),

NEW JERSEY MOTOR VEHICLE
COMMISSION,
 Defendant(s)/Respondent(s).

Order Waiving Filing Fees

This matter having been brought before the court on application of DEVON T. BARBER,
 (plaintiff(s)/ appellant(s)/ defendant(s)/ respondent(s)) for an **Order** waiving filing fees
 pursuant to *Rule 1:13-2* or *Rule 2:7-1*, and the Court having considered the moving party's financial
 information, the matter and for good cause appearing:

(Do not write below this line, For Court Use Only)

It is on this _____ day of _____, 20____, **ORDERED** that the application for a fee waiver is

Granted Denied

DEVON TYLER BARBER
Plaintiff, Pro Se
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
Tylerstead@ProtonMail.com

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – MERCER COUNTY**

DEVON TYLER BARBER,
Plaintiff,
v.
**NEW JERSEY MOTOR VEHICLE
COMMISSION,**
Defendant.

Docket No.: MER-L-002371-25

Civil Action

INTRODUCTION TO EXHIBIT B

Notice of Denial of Fee-Waiver Application (IFP Denial)

This Exhibit consists of the official notice issued by the Superior Court of New Jersey, Law Division – Mercer County, denying Plaintiff's Application for a Fee Waiver (In Forma Pauperis). The notice is dated November 14, 2025, and was issued prior to the filing of Plaintiff's Amended Verified Complaint and supporting applications.

Plaintiff submits this Exhibit to demonstrate:

1. that the Court previously denied Plaintiff's request for indigency relief despite Plaintiff's qualifying financial status under N.J.S.A. 22A:2-12;
2. that the denial materially affects Plaintiff's ability to access the courts and prosecute this prerogative-writ matter; and
3. that reconsideration is necessary to prevent the improper rejection of filings under R. 1:5-6(c) and to safeguard Plaintiff's constitutional right of access to the judiciary.

A true and correct copy of the denial notice follows.

MER-L-002371-25 11/13/2025 Pg 1 of 1 Trans ID: LCV20253085743

PREPARED BY THE COURT

PLAINTIFF:	SUPERIOR COURT OF NEW JERSEY
Devon Barber	MERCER COUNTY
VS.	Docket No. Mercer - L-2371-25
DEFENDANT:	Civil Action
New Jersey Motor Vehicle Commission	ORDER FOR WAIVER OF FEES

THIS MATTER being opened to the Court by Devon Barber seeking a waiver of filing fees on the grounds of indigency; and the Court having reviewed the papers submitted in support of this application for a declaration of indigency and the waiver of filing fees pursuant to R. 1:13-2 or R. 2:7-1 and in conjunction with AOC Directive #03-17,

IT IS on this 13th day of November 2025, **ORDERED** that the application is:

GRANTED: All fees related to the filing shall be waived. The applicant is responsible for any costs associated with the service and/or advertising/publishing of any complaint. If applicant is awarded more than \$2000 in this case, the applicant is responsible to repay any and all fees waived as determined by the court.

XX **DENIED:**

Failure to establish household income is below 150% of the federal poverty level and/or that applicant has no more than \$2500 in liquid assets;

Failure to produce most recent award statement of proof of eligibility for public assistance and/or social security disability;

XX Failure to produce two (2) months of documentation for welfare, public assistance, unemployment, disability, social security, child support/alimony or other income; and/or failure to produce six (6) months of all bank account statements;

The court finds that the complaint, application, motion, appeal, petition or other filing is frivolous or malicious or constitutes an abuse of process.

IT IS FURTHER ORDERED that the applicant shall serve a copy of this Order on all parties within seven (7) days from the date of this Order. This order expires one year after the final disposition of the case/judgment. If filed on appeal, the provisions of Rule 2:7-4 shall apply. Once the fee waiver has expired, the litigant is required to file another request for any further waiver of fees in this matter.

/s/ Douglas H. Hurd
HON. DOUGLAS H. HURD, P.J. CV.