

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – SPECIAL CIVIL PART
ATLANTIC COUNTY

NEW JERSEY TURNPIKE AUTHORITY,

Plaintiff / Counter-Defendant,

v.

DEVON TYLER BARBER,

Defendant / Counter-Plaintiff.

Docket No.: ATL-DC-007956-25

**LETTER CORRESPONDENCE – ADA ACCOMMODATION REQUEST
AND INQUIRY REGARDING COURT-ORDERED FILING DEADLINES**

The Honorable Dean R. Marcolongo, J.S.C.

Atlantic County Civil Courthouse, 1201 Bacharach Boulevard, Atlantic City, New Jersey [08401

Dear Judge Marcolongo / Clerk of the Court:

1. Please accept the enclosed correspondence as **Defendant / Counter-Plaintiff's** formal **ADA Accommodation Request** pursuant to *Title II of the Americans with Disabilities Act and Judiciary Policy CN 10775*.
2. A copy of this request was transmitted by email on **November 3, 2025** to **Christopher Koos**, *ADA Coordinator for the Atlantic County Superior Court*, at **Christopher.Koos@njcourts.gov**, for administrative processing. It is attached hereto for inclusion in the official record pursuant to *R. 1:5-6(b)*.
3. In addition, I write not to burden the Court but simply to ensure that my filings are properly reflected and docketed pursuant to the Court's **October 27, 2025 Order (Hon. Dean R. Marcolongo, J.S.C.)**. That Order directed:

(a) Plaintiff to file an **Answer to Defendant's Counterclaim within ten (10) days**;

(b) Plaintiff to file any **response to Defendant's proceeding documents filed electronically the evening of October 27, 2025, within thirty (30) days**; and

(c) Either party may pursue **limited discovery requests** as permitted by the Order.

4. To date, I have received **no discovery requests or responsive filings from the Plaintiff**, and I believe I have fully complied with the Court's directives. I respectfully request confirmation that the docket reflects these timelines accurately and that the deadlines are being calculated from the **date the Order was entered**, to avoid any procedural confusion or delay in further processing.
5. Thank you for your time, attention, and continued consideration of accessibility needs under *Judiciary Policy CN 10775*.

CERTIFICATION OF FILING AND SERVICE (R. 1:4-4(b))

I, **Devon Tyler Barber**, certify that on **November 3, 2025**, I filed this correspondence and attached ADA request electronically through the **Judiciary Electronic Document Submission (JEDS)** system for docketing under *R. 1:5-6(b)*. Simultaneously causing to be served by email upon all appearing parties at their last known email addresses.

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

s/ **Devon Tyler Barber**
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350 | Tylerstead@ProtonMail.com
Dated: November 3, 2025

11/3/25, 9:33 AM

(1) Sent | dTb33@pm.me | Proton Mail

ADA Accommodation Request – Devon T. Barber

From dTb33
To Christopher Koos
Date Monday, November 3rd, 2025 at 9:31 AM

Dear Mr. Koos,

Thank you for reaching out and for providing the ADA brochure. I appreciate the Judiciary's commitment to accessibility and equal participation.

I experience documented neurological and psychological limitations, including residual effects from a prior head injury and anxiety-related cognitive fatigue. These conditions can cause concentration difficulty, sensory overload, and slowed processing during extended or high-stress proceedings. I am also currently without stable housing, which makes receiving or sending physical mail unreliable.

To ensure I can meaningfully participate in all court proceedings, I respectfully request the following reasonable accommodations pursuant to Title II of the ADA and Judiciary Policy CN 10775:

1. **Proceeding primarily on written submissions ("on the papers")** whenever possible, as written communication allows me to focus and respond accurately without cognitive overload.
2. **Appointment of stand-by procedural or advisory counsel**—not for representation on the merits, but to assist with procedural compliance, scheduling, and communication.
3. **Electronic filing and service by email (DTB33@ProtonMail.com)** in lieu of physical mail, in light of my current homelessness and limited access to a secure mailing address.
4. **Modified scheduling or short recesses** during any required live proceedings to manage fatigue and maintain focus.
5. **Advance access to written materials and orders** whenever feasible, to allow adequate review before hearings or deadlines.

These accommodations will allow me to participate effectively and equitably while minimizing disruption to the Court or other parties. I am happy to provide supporting documentation or discuss implementation details at your convenience.

Thank you very much for your time, understanding, and assistance.

Respectfully,
Devon Tyler Barber
325 E. Jimmie Leeds Rd., Suite 7-333
Galloway, NJ 08205
(609) 665-9350
Email: DTB33@ProtonMail.com

11/3/25, 9:33 AM

(1) Sent | dTb33@pm.me | Proton Mail

Note: I will also be filing or submitting a copy of this correspondence for inclusion in the official court record pursuant to Rule 1:5-6(b), so that my ADA accommodation request is reflected on the docket.

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

On Monday, November 3rd, 2025 at 8:57 AM, Christopher Koos <christopher.koos@njcourts.gov> wrote:

Good morning,

My name is Christopher Koos, and I am the ADA Coordinator for the Atlantic County Superior Court. I was forwarded a copy of your supplemental brief in which you requested a reasonable accommodation pursuant to the Americans with Disabilities Act (ADA), and I would like to gather some additional information.

The New Jersey Judiciary is committed to ensuring that its courts, programs, services, and activities are accessible to all members of the community. We provide reasonable accommodations to court users with disabilities, enabling them to access and participate in court proceedings and related activities. I have attached our ADA brochure hereto for your review, as it contains additional information and examples of accommodations we have provided in the past.

To best assist you, please provide me with information regarding your disability and any specific limitations you experience in accessing or participating in court activities. I also welcome your recommendations regarding the type of ADA approved accommodation you are seeking and what would be most effective for you. While we may not be able to fulfill your exact request, we will strive to provide an accommodation that affords equal opportunity to participate in court services.

If you have any questions, please do not hesitate to contact me.

Sincerely,

11/3/25, 9:33 AM

(1) Sent | dTb33@pm.me | Proton Mail



Christopher Koos, Esq.
Operations Manager, ATCA
VICINAGE 1 / ATLANTIC COUNTY
PH: (609)402-0100, 47246

https://mail.proton.me/u/14/sent/lqwWNTrx1rq1P5Ft8-mN2W8lQcTaEcb7j5z4hhwSA-54ZtOkS4G_svkffx8bj2tbYoAx0m7FkD4B2NPWB0UWg==/wfJA... 3/3