

1 **Devon T. Barber**
2 *Pro Se Plaintiff*
3 325 E. Jimmie Leeds Road, Suite 7-333
4 Galloway, NJ 08205
5 (609) 665-9350 | DTB33@ProtonMail.com

6 **SUPERIOR COURT OF NEW JERSEY**
7 **CHANCERY DIVISION – GENERAL EQUITY PART**
8 **AND**
9 **LAW DIVISION – CIVIL PART**
10 **ATLANTIC COUNTY**

11 **Devon T. Barber,**
12 Plaintiff Pro Se,
13 v.
14 **CarMax Business Services LLC, et**
15 **al., and New Jersey Motor Vehicle**
16 **Commission,**
17 Defendants.

Chancery Docket No.: ATL-C-000094-25
Civil Docket No.: ATL-L-002869-25

CERTIFICATE OF SERVICE

12 **CERTIFICATE OF SERVICE (VIA EMAIL AND E-COURTS)**

13 I, Devon T. Barber, certify pursuant to R. 1:5-1(a), R. 1:5-2, and R. 1:4-4(b) that on October
14 20, 2025, I filed through the Judiciary Electronic Document Submissions (JEDS / eCourts)
15 system and served by electronic mail the following documents in the above-captioned matters:

16 **I. Filed and Served for Chancery Division – ATL-C-000094-25**

- 17 1. **Verified Certification of Facts and Memorandum of Law in Support of Declaratory**
18 **Relief**
- 19 2. **Proposed Form of Order (Declaratory Relief – Chancery Division)**
- 20 3. **Certificate of Service (Initial JEDS Filing, dated October 17, 2025)**
- 21 4. **Track Assignment Notice and Correspondence (acknowledgment of related dockets)**

22 **5. Supplemental Certification and Exhibit F (Pattern of Fraud, Ownership
23 Clarification, and Consumer Harm), including:**

- 24 • **Exhibit F-0:** CarMax “Congratulations/Ownership” email (VW Jetta – 2/20/2023)
25 • **Exhibit F-1(a):** CarMax Sales Manager email re SSN resubmission to Exeter (2/27/2023)
26 • **Exhibit F-1(b):** “Unfunded Contracts” email re “funding issue” (3/2/2023)
27 • **Exhibit F-2:** Certified MVC Lien & Title Search Certificates (Passat)
28 • **Exhibit F-3:** myFICO / Equifax report showing false CarMax tradeline
29 • **Exhibit F-4:** UCC Filing # 57454825 and Amendments
30 • **Exhibit F-5:** Prior Notice to CarMax and MVC (6/3/2025)
31 • **Exhibit F-6:** Proof of E-Service Eligibility emails (June 2025)

32 **II. Filed and Served for Civil Division – ATL-L-002869-25**

- 33 1. **Original and Amended Complaint with Civil Case Information Statement (CIS)**
34 2. **Verified Certification of Facts and Memorandum of Law in Support of Summary
35 and Injunctive Relief**
36 3. **Proposed Form of Order (Civil Part – Summary and Injunctive Relief)**
37 4. **Track Assignment Notice (issued October 16, 2025)**
38 5. **Certificate of Service (Initial Complaint Packet, dated October 17, 2025)**
39 6. **Supplemental Certification and Exhibit F (as listed above)**

40 **III. Service List**

41 **Primary E-Service – CarMax Entities (Defendants 2–8):**

42 reply_to_case@carmax.com; Executive_Response_Team@carmax.com;
43 bill_nash@carmax.com;
44 ed_hill@carmax.com; jon_daniels@carmax.com; Jong_H_Han@carmax.com;
45 CAF_SCRA@carmax.com;
46 investor_relations@carmax.com; supplier@carmax.com

47 **Primary E-Service – New Jersey Motor Vehicle Commission and Related Agencies
48 (Defendant 9):**

49 titles@njmvcc.gov; lieninquiries@njmvcc.gov; customeradvocacy@mvc.nj.gov;
50 ombudsman@mvc.nj.gov;
51 ucc@treas.nj.gov; revenue@treas.nj.gov; oal@oal.nj.gov

52 **Courtesy Copies (supporting exhibit authors/senders):**

53 paula_t_driscoll@carmax.com; daisy_morgan@carmax.com

54 Defendants CarMax Business Services LLC et al. have previously corresponded with Plaintiff
55 through these same corporate email addresses and have thereby consented to electronic service
56 pursuant to R. 1:5-1(a)(2)(C), as documented in Exhibit F-6 (Proof of E-Service Eligibility).

57 Electronic service constitutes valid service under **R. 1:5-1(a)(1)**.

58 No paper copies were served.

59 I certify that the foregoing statements made by me are true.

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

61 **Executed:** Atlantic County, New Jersey October 20, 2025

62 **/s/ Devon T. Barber**

63 **Devon T. Barber, Pro Se Plaintiff**
64 325 E. Jimmie Leeds Road, Suite 7-333
65 Galloway, NJ 08205
66 (609) 665-9350 • DTB33@ProtonMail.com

SERVICE COPY – Barber v. CarMax Business Services LLC et al. – ATL-C-000094-25 / ATL-L-002869-25

From dTb33 <dTb33@protonmail.com>

To Reply To CarMax Case<reply_to_case@carmax.com>, Executive_Response_Team@carmax.com, bill_nash@carmax.com, ed_hill@carmax.com, jon_daniels@carmax.com, Jong_H_Han@carmax.com, CAF_SCRA@carmax.com, investor_relations@carmax.com, supplier@carmax.com, titles@njmvic.gov, lieninquiries@njmvic.gov, customeradvocacy@mvc.nj.gov, ombudsman@mvc.nj.gov, ucc@treas.nj.gov, revenue@treas.nj.gov, oal@nal.nj.gov

CC paula_t_driscoll@carmax.com, daisy_morgan@carmax.com

Date Monday, October 20th, 2025 at 3:27 PM

Subject: SERVICE COPY – Barber v. CarMax Business Services LLC et al. – ATL-C-000094-25 / ATL-L-002869-25

To:

reply_to_case@carmax.com; Executive_Response_Team@carmax.com; bill_nash@carmax.com; ed_hill@carmax.com; jon_daniels@carmax.com; Jong_H_Han@carmax.com; CAF_SCRA@carmax.com; investor_relations@carmax.com; supplier@carmax.com; titles@njmvic.gov; lieninquiries@njmvic.gov; customeradvocacy@mvc.nj.gov; ombudsman@mvc.nj.gov; ucc@treas.nj.gov; revenue@treas.nj.gov; tal@nal.nj.gov

Cc:

paula_t_driscoll@carmax.com; daisy_morgan@carmax.com

From:

Devon T. Barber, Pro Se Plaintiff – DTB33@ProtonMail.com

Date: October 20, 2025

Dear Counsel and Agency Representatives,

Pursuant to R. 1:5-1(a) and R. 1:4-4(b), please find service copies of filings submitted in the related matters:

Barber v. CarMax Business Services LLC, et al., and New Jersey Motor Vehicle Commission
Docket Nos.: ATL-C-000094-25 (Chancery Division) and ATL-L-002869-25 (Civil Division)

Documents Served with this email

Chancery – ATL-C-000094-25

- 1. Verified Certification of Facts and Memorandum of Law in Support of Declaratory Relief**
- 2. Proposed Form of Order (Declaratory Relief – Chancery Division)**
- 3. Track Assignment Notice and correspondence**

4. Supplemental Certification and Exhibit F (*Pattern of Fraud, Ownership Clarification, and Consumer Harm*) — copy to follow via JEDS acceptance notice today (see note below)

Civil – ATL-L-002869-25

1. Original and Amended Complaint with Civil Case Information Statement (CIS)
2. Verified Certification of Facts and Memorandum of Law in Support of Summary and Injunctive Relief
3. Proposed Form of Order (Civil Part – Summary and Injunctive Relief)
4. Track Assignment Notice (issued October 16, 2025)
5. Supplemental Certification and Exhibit F (*same as above*) — copy to follow via JEDS acceptance notice today

Attachments to this email:

- Merged Docket Original Complaint and Motion.pdf
- Original Complaint and Motion w Track Assignment.pdf
- Certificate of Service.pdf (dated October 20, 2025)

JEDS timing note: The Supplemental Certification and Exhibit F is being filed in both dockets via JEDS today (October 20, 2025) immediately following this email. Upon JEDS acceptance, I will forward the file-stamped copy to this same distribution list.

Electronic service is made to the corporate and agency email addresses that have been used by you previously in this matter. Defendants have consented to electronic service by conduct under R. 1:5-1(a)(2) (C); supporting emails are included in Exhibit F-6 (Proof of E-Service Eligibility). No paper copies are served.

Please reply “Received” for the record. The filings are (or will be) uploaded to the respective dockets via JEDS today.

Respectfully submitted,

s/ Devon T. Barber
Devon T. Barber, Pro Se Plaintiff
325 E. Jimmie Leeds Road, Suite 7-333
Galloway, NJ 08205
(609) 665-9350 | DTB33@ProtonMail.com

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

11.47 MB 3 files attached

Original Complaint and Motion w Track Assignment.pdf 5.06 MB

10/20/25, 3:27 PM

Merged Docket Original Complaint and Motion.pdf 6.15 MB

Certificate of Service (2).pdf 275.27 KB