

WALTER M. LUERS, ESQ. – 034041999
 LAW OFFICES OF WALTER M. LUERS, LLC
 Suite 2
 122 West Main Street
 Clinton, New Jersey 08809
 Telephone: 908.894.5656
 Attorneys for Plaintiffs

<p>JENNIFER COOMBS, GAVIN ROZZI and JEFF EPSTEIN,</p> <p>Plaintiffs,</p> <p>v.</p> <p>COUNTY OF MONMOUTH and MARION MASNICK in her official capacity as Clerk of the Board and Records Custodian of the County of Monmouth, OFFICE OF THE MONMOUTH COUNTY PROSECUTOR and the RECORDS CUSTODIAN of the Office of the Monmouth County Prosecutor,</p> <p>Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MONMOUTH COUNTY</p> <p>DOCKET NO. Mon-L-003195-18</p> <p>CIVIL ACTION</p> <p>ORDER TO SHOW CAUSE (OPRA SUMMARY PROCEEDING)</p>
--	--

THIS MATTER having been opened to the Court by Law Offices of Walter M. Luers, LLC, attorney for Plaintiffs Jennifer Coombs, Gavin Rozzi, and Jeff Epstein, seeking relief by way of summary action pursuant to *R. 4:67-1* and 2(a), based upon the facts set forth in the verified complaint and supporting papers filed herewith; and the Court having determined that this matter may be commenced by order to show cause as a summary proceeding pursuant to *N.J.S.A. 47:1A-6* and for good cause shown,

IT IS on this 6th day of September, 2018 *ORDERED* that the Defendants County of Monmouth, Marion Masnick in her official capacity as Clerk of the Board and Records Custodian of the County of Monmouth, Office of the Monmouth County Prosecutor, and the Records Custodian of the Office of the Monmouth County Prosecutor appear and show cause on

the 26th day of November, 2018 before the Honorable Lisa P. Thornton, A.J.S.C, Superior Court of New Jersey, County of Monmouth, Monmouth County Courthouse, 71 Monument Park, 3rd Floor, Freehold, New Jersey, at 9:30 in the morning or as soon thereafter as counsel can be heard, why judgment should not be entered:

A. Ordering Defendants to disclose to Plaintiffs the copies of documents requested by all of the Plaintiffs via OPRAMachine, which were: (1) June 11, 2018 request for emails to or from officials within the Prosecutor's office containing the terms "Jennifer Coombs," "Jen Coombs," "OPRA Request(s)," or "Citizens Videotaping in Public Buildings;" (2) June 25, 2018 OPRA request to Monmouth County for copies of all private security contracts for Monmouth County Office Buildings and County Office Buildings and current contracts associated with those buildings; (3) all 2017 and 2018 applications and RFPs for grants received by Monmouth County and the resolutions for each grant; (4) all litigation settlement agreements involving Monmouth County for the time period from January 1, 2010 to December 31, 2017; (5) all OPRA requests received by Monmouth County between July 1, 2018 and July 13, 2018; and (6) all legal bills for Cleary, Giacobbe, Alfieri & Jacobs for the month of June 2018;

B. An award of costs of this action and reasonable attorneys' fees;

C. Such other, further and different relief as the Court may deem equitable and just.

And it is further *ORDERED* that:

1. A copy of this order to show cause, verified complaint and all supporting affidavits or certifications submitted in support of this application be served upon the Defendants within 7 days of the date hereof.

2. The Plaintiffs must file with the Court their proof of service of the pleadings on the Defendants no later than three (3) days before the return date.

3. Defendants shall file and serve a written answer and opposition papers to this order to show cause and the relief requested in the verified complaint and proof of service of the same by October 3rd, 2018. The answer and opposition papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the papers must be sent directly to the chambers of the Honorable Lisa. P. Thornton, A.J.S.C.

4. The Plaintiffs must file and serve any written reply to the Defendants' order to show cause opposition by October 17th, 2018. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of the Honorable Lisa P. Thornton, A.J.S.C.

5. If the Defendants do not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the Plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

6. If the Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court no later than three (3) days before the return date.

7. Defendants take notice that the Plaintiffs have filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer and opposition papers and proof of service before the return date of the order to show cause.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the

county listed above and online at:

http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Unless exempt from paying the filing fee, include a \$175 filing fee payable to the “Treasurer, State of New Jersey.” You must also send a copy of your answer and opposition papers to the Plaintiff’s attorney whose name and address appear above, or to the Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your answer and opposition papers (with the fee) or judgment may be entered against you by default.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at: http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

/S/ Lisa P. Thornton
HON. LISA P. THORNTON, A.J.S.C.