



*State of New Jersey*  
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July 30, 2015

Via Hand Delivery

The Honorable Mary C. Jacobson  
New Criminal Courthouse  
500 South Warren Street  
Trenton, New Jersey 08650

Re: Kavadas v. Martinez  
Docket No. MER-L-1004-15

Dear Judge Jacobson:

I represent Defendants Raymond P. Martinez, Attorney General John Jay Hoffman, and Natasha Johnson ("Defendants") in the above-captioned matter. This letter is provided upon Your Honor's request in advance of the case management conference on August 3, 2015.

Upon consideration of the factual assertions made by Plaintiffs in their Verified Complaint, this office intends to move forward with a Motion for Summary Judgment. In anticipation of this Motion, and in order to clarify issues of fact, Defendants request time to complete discovery including, but not limited to:

- Depositions of the four Plaintiffs;
- Interrogatories, requests for production of documents, and requests for admissions related to the factual assertions made in the Verified Complaint and briefs;
- Depositions of any expert(s) and/or any witness who Plaintiffs have relied on or will rely on for statistical information and analysis;
- Depositions of Plaintiffs' witnesses; and
- Certifications from Defendants' witnesses.



July 30, 2015

The issues most pertinent to resolution of this matter include:

- Clarification of Plaintiffs' various histories of child support enforcement;
- Clarification of the procedure operationalized to automatically suspend drivers' licenses upon the issuance of a bench warrant, particularly relevant to notice given to obligors and situations where a two-week bench warrant status is utilized;
- Clarification of the role, if any, of defendants Attorney General John Jay Hoffman, the Office of the Attorney General, Raymond Martinez, the Motor Vehicle Commission, Natasha Johnson, and the Department of Human Services, Division of Family Development, Office of Child Support Services, in the actions challenged by Plaintiffs; and
- Verification or negation of statistics set forth by Plaintiffs.

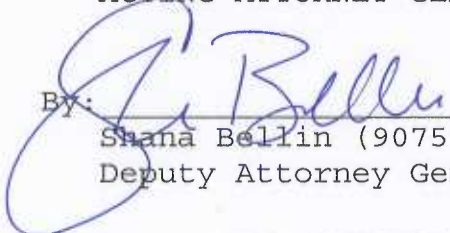
Defendants respectfully request until October 30, 2015, to conduct the aforementioned discovery. Upon completion of discovery, Defendants request until November 30, 2015, to submit their Motion for Summary Judgment.

If the Court requires any additional information, please do not hesitate to contact me. Thank you for your attention to this matter.

Respectfully submitted,

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

BY:

  
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c: David Perry Davis, Esq. via electronic mail