THE LAW OFFICE OF

# DAVID PERRY DAVIS

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August 20, 2015

Hon. Mary C. Jacobson, AJSC Superior Court of New Jersey Criminal Courthouse 400 South Warren Street Trenton, NJ 08650-0068 Via hand delivery

Re: <u>Kavadas, et al v. Martinez, et el</u>
Docket No. MER-L-1004-15

Dear Judge Jacobson:

Attached please find a courtesy copy of a Notice of Motion for Partial Summary Judgment in this matter addressing the issue of providing all obligors with the statutorily required 20 day notice before a suspension is effective.

Pursuant to <u>Rule</u> 4:46-1, the Court has discretion "for good cause shown" to set a return date earlier than the one otherwise set forth in the Rule. In light of both the urgency of the issue presented and its simplicity, it is respectfully requested that the Court set as early a return date as possible for the annexed.

I thank the Court for its consideration in this matter. Please feel free to contact me at the above email address or telephone number if there are any questions.

Respectfully,

David Perry Davis, Esq.

Cc: Shana Bellin, DAG, Esq. (Via fax and PDF)
 Named plaintiffs (Via PDF)

The Late Office of
David Perry Davis
112 West Franklin Ave
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(609) 737-2222
(609) 737-3222 (fax)
Attorney ID: 047451996
Attorney for plaintiffs

Andreana Kavadas, Alisha : Grabowski, LaQuay Dansby, : Paulo Arede, individually : and on behalf of all : persons similarly situated, :

Plaintiffs

vs.

Raymond P. Martinez, in his official capacity as Chief Administrator of the New Jersey Motor Vehicle Commission, and The New Jersey Motor Vehicle Commission,

John Jay Hoffman, Esq., in his official capacity as Acting Attorney General of the State of New Jersey, and The State of New Jersey,

Natasha Johnson, in her official capacity as Director of the Department of Human Services, Division of Family Development, Office of Child Support Services, and the Department of Human Services, Division of Family Development, Office of Child Support Services,

Defendants

: SUPERIOR COURT OF NEW JERSEY : CHANCERY DIVISION — FAMILY PART : MERCER COUNTY : DOCKET NO. MER-L-1004-15

Civil Action

NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT PURSUANT TO RULE 4:46-1

PLEASE TAKE NOTICE that, on \_\_\_\_\_\_\_, at 9:00 a.m., or as soon thereafter as may be heard, the undersigned shall move in the Superior Court of New Jersey, Chancery Division, located at Mercer County Superior Court, New Criminal Courthouse, 400 North Warren Street, Trenton, before the Honorable Mary C. Jacobson, A.J.S.C. for an Order:

- A. Granting partial summary judgment and enjoining the New Jersey Motor Vehicle Commission from continuing to violate the mandate of N.J.S.A. 39:5-30 and N.J.S.A. 2A:17-56.44 requiring that support-related license suspensions be effective 20 days after the postmark of the notice informing the obligor of a suspension;
- B. For such further relief as the court may deem equitable and just.

Plaintiff shall rely on the enclosed certifications, letter brief, and attachments. Oral argument is requested.

David Perry Davis, Esq. Attorney for plaintiffs

The Law Office of David Perry Davis 112 West Franklin Ave Pennington NJ 08534 (609) 737-2222 (609) 737-3222 (fax) Attorney ID: 047451996 Attorney for plaintiffs

Andreana Kavadas, Alisha Arede, individually and on behalf of all persons similarly : DOCKET NO. MER-L-1004-15 situated,

Plaintiffs

VS.

Raymond P. Martinez, in his official capacity as Chief Administrator of the New Jersey Motor Vehicle Commission, and The New Jersey Motor Vehicle Commission,

John Jay Hoffman, Esq., in his official capacity as Acting Attorney General of the State of New Jersey, and The State of New Jersey,

Natasha Johnson, in her official capacity as Director of the Department of Human Services, Division of Family Development, Office of Child Support Services, and the Department of Human Services, Division of Family Development, Office of Child Support Services,

Defendants

: SUPERIOR COURT OF NEW JERSEY Grabowski, LaQuay Dansby, Paulo : CHANCERY DIVISION - FAMILY PART : MERCER COUNTY

Civil Action

PROOF OF SERVICE

Robin Henderson, of full age, hereby certifies as follows:

1. I am a paralegal employed by the Law Office of David Perry Davis, attorney for plaintiffs in this matter.

2. On this date, I caused a copy of the enclosed documents and this Proof of Service to be served upon the following:

> Shana Bellin, Esq., DAG Office of the Attorney General Hughes Justice Complex 25 Market Street, 1st Floor Trenton, NJ 08560 By PDF and regular mail

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

THE LAW OFFICE OF

# DAVID PERRY DAVIS

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August 21, 2015

Hon. Mary C. Jacobson, AJSC Superior Court of New Jersey Criminal Courthouse 400 South Warren Street Trenton, NJ 08650-0068

Re: <u>Kavadas, et al v. Martinez, et el</u> Docket No. MER-L-1004-15

Dear Judge Jacobson:

Please accept this letter brief in lieu of a more formal submission in support of plaintiffs' application.

#### Relevant procedural history

Plaintiffs filed a complaint and application for an order to show cause on May 1, 2015. Defendants filed opposition to the application on June 26. Although it was included with plaintiffs' application and thoroughly briefed, the State did not address the issue of requiring the Motor Vehicle Commission to begin complying with the mandate of N.J.S.A. 2A:17-56.44 that support-related license suspensions be effective 20 days after the postmark of the notice informing the obligor of the suspension. Plaintiffs filed a reply on July 13.

Defendants sought leave to file a surreply brief on July 15. Because plaintiffs had addressed new issues in their reply relief regarding statutory construction and whether the AOC had greatly exceeded its constitutional authority in the issuance of Directive #15-08 by providing insufficient due process before warrants (with

resulting automatic license suspensions) issue, plaintiffs consented to a surreply as to those issues.

In its surreply, for the first time, defendants addressed plaintiff's argument as to providing the statutorily required 20 days notice to obligors whose licenses are suspended. Defendants' brief was filed and served seven days before oral argument. Plaintiffs' attempted to file a response two days later on July 17, but did not have leave of the Court to do so as there had been no time to request same. Defendants should not have presented a new argument in a surreply to which plaintiffs had no right to respond.

Plaintiffs now file this application seeking partial summary judgment as to the singular issue of compelling the New Jersey Motor Vehicle Commission to provide fair notice to all persons facing a license suspension as the result of support arrears.

## Statement of Facts

A Statement of Material Facts is attached. These are the only relevant facts. They are not in dispute and cannot be challenged:

- 1. Plaintiffs are child support obligors.
- 2. Plaintiffs are subject to "two week warrant status" orders.
- 3. Plaintiffs have, for periods of at least two years each, been in arrears that exceed that amount of support due for two weeks.
- 4. Plaintiffs' licenses are subject to automatic suspension as the result of the issuance of a child support-related warrant.
- 5. Pursuant to Directive #15-08, plaintiffs are not entitled any notice prior to the issuance of a warrant.

#### Legal Argument

- I. THE COURT SHOULD GRANT PARTIAL SUMMARY JUDGMENT AND ENJOIN THE MVC FROM CONTINUING TO VIOLATE THE NOTICE PROVISIONS OF N.J.S.A. 39:5-30 AND N.J.S.A. 2A:17-56.44.
  - A. <u>Summary judgment is appropriate when, as here,</u> there are no genuine issues of material fact.

Rule 4:46-1 permits a party seeking affirmative relief to move for partial summary judgment at any time after the expiration of 35 days from the service of the pleading claiming such relief.

Summary judgment may be granted when there are no genuine issues of material fact and the moving party is entitled to judgment as a matter of law. See,  $\underline{R}$ . 4:46-2(c);  $\underline{Brill\ v}$ . Guardian Life Ins. Co. of Am., 142 N.J. 520, 540 (1995).

While plaintiffs maintain that all the issues before this court are legal and not factual, the issue of obligors receiving adequate notice of a suspension is not contingent on any matters beyond those set forth in the annexed Statement of Material Facts (Exhibit G).

B. Background as to suspension of licenses as the result of an obligor defaulting on a support order.

There are two primary methods by which driver's licenses can be suspended as the result of child support arrears.

After a certain level of arrears develop, probation may schedule a hearing pursuant to N.J.S.A. 2A:17-56.43. The statute provides criteria that must be addressed in the context of a hearing as to whether a suspension would be justified and coercive rather than counterproductive and as to whether there is any

equitable reason, such as involuntary unemployment or disability, that would mitigate against a license suspension. In 2014, 109 obligor's licenses were suspended as the result of a such hearing (See Exhibit A-1).

Although otherwise only addressing the procedure to be employed when a license suspension is at issue, 2A:17-56.41(3)(a) contains a single line mandating the suspension of an obligor's license "by operation of law upon the issuance of a child support-related warrant." The Administrative Office of the Courts has instructed that when an obligor defaults, "the order may provide that if future payments are missed, a warrant may be issued without any additional notice to the obligor." AOC Directive #15-08 at page 3-4. In 2014, 20,381 licenses were suspended via this method - without a hearing and without the obligors receiving any notice that they had lost their license.

Additionally, an OPRA request revealed that the Motor Vehicle Commission erroneously suspends an average of 400 obligors per year (Exhibit A-2, A-3). An erroneous suspension means that the license

¹ The data provided by the Division of Family Development as to the number of licenses suspended last year (20,498, Exhibit A, page 1) differs significantly from the information provided by the Motor Vehicle Commission (45,634, Exhibit A, page 2). Counsel is continuing to pursue some explanation for the significant divergence. For purposes of this application, plaintiffs utilize the numbers supplied by the DFD, however the court should be aware that the number of suspensions may be more than double this amount.

was not held by the support obligor, the order at issue had been vacated, the obligor had in fact appeared to answer a summons, or some other error occurred in the system. None of these people received notice that their license was being suspended.

The statute that permits the MVC to suspend licenses makes clear that this can never occur without notice. N.J.S.A. 39:5-30 states, in relevant part:

a. Every . . . privilege to drive motor vehicles . . . may be suspended or revoked by the director for a violation of any of the provisions of this Title or on any other reasonable grounds, after due notice in writing of such proposed suspension, revocation, disqualification or prohibition and the ground thereof." (Emphasis added).

More specifically, N.J.S.A. 2A:17-56.44 states that "upon the receipt of an order requiring the suspension or revocation of a license, the licensing authority shall immediately notify the licensee of the effective date of the suspension, which shall be 20 days after the postmark of the notice."

Suspending licenses without notice is thus violative of the text of two statutes, of explicit case law, of every basic notion of procedural due process, and is fundamentally unfair. This Court is asked to grant partial summary judgment in plaintiff's favor and enjoin the MVC from continuing it.

# C. <u>A "license" includes a driver's license and a warrant is an order.</u>

In its surreply, defendants argued that a warrant is fundamentally different from an order and that the statute

requiring notification be provided to obligors suspended via a warrant does not apply as the definition of "license" does not include a "driver's license."

The idea that a "license" does not include a driver's license is belied not only by common sense, but by the "definitions" section of the New Jersey Child Support Improvement Act ("the Act.")

N.J.S.A. 2A:17-56.52 provides that, for purposes of the Act (which would obviously include but not be limited to N.J.S.A. 2A:17-56.44): "License" means any license, registration or certificate issued by the State or its agencies or boards that is directly necessary to provide a product or service for compensation, to operate a motor vehicle, or for recreational or sporting purposes. (Emphasis added).

Therefore, a license includes a driver's license and is subject to the statute.

Defendants next argued "The Legislature was clear in its language that the 20 days' notice given by the licensing authority, here the MVC, applies when the Court *orders* the suspension of a license, not when a warrant is issued suspending a license." (Exhibit B at 13).

The underlying premise of this argument - that a warrant and an order are legally distinguishable - is erroneous. A warrant  $\underline{is}$  an order.

The word "order" is clearly defined in the law. Black's Law Dictionary defines an order as "A mandate. precept; a command or

direction authoritatively given ..." http://thelawdictionary.org/order/ (visited 8/9/15). There is no definition of the word "order" that excludes a command or direction authoritatively given to a third party.

A warrant is "1. A writ or precept from a competent authority in pursuance of law, directing the doing of an act, and addressed to an officer or person competent to do the act, and affording him protection from damage, if he does it. People v. Wood, 71 N.Y. 376 (1877). 2. Particularly, a writ or precept issued by a magistrate, justice, or other competent authority, addressed to a sheriff, constable, or other officer, requiring him to arrest the body of a person therein named, and bring him before the magistrate or court... 3. A warrant is an order by which the drawer authorizes one person to pay a particular sum of money" citing Shawnee County <u>v. Carter</u>, 2 <u>Kan.</u> 130 (1863) (Emphasis added). Other legal dictionaries provide essentially identical definitions for this common word, all of which affirm that a warrant is an order. "A warrant is an order giving law enforcement authorization to take a particular action." http://dictionary.reference.com/browse/warrant (Emphasis added) (visited 8/9/15). Seealso, http:// thelawdictionary.org/warrant-of-arrest/ (visited 8/9/15) (an arrest warrant is "[a] written order. . . " citing Brown v. State, 109 <u>Ala.</u> 70, 20 <u>So.</u> 103 (1895)); <u>People v. Smith</u>, 926 <u>P.2d</u> 186 (Colo.App.1996) ("An arrest warrant is an order from a court directed to any peace officer commanding the arrest of the person named or described in the order.) (Emphasis added); People v.

Kempner, 208 N.Y. 16 (1913); ("Arrest Warrant: A written order
issued by authority of the state and commanding the seizure of the
person named") http://legal-dictionary.thefreedictionary.com
/Arrest+Warrant (visited 8/9/15).

Unquestionably, a warrant is an order.<sup>2</sup> That is, it is a command signed by a judge requiring that some act occur. From as far back as legal authority goes, every definition of the term confirms that a warrant is therefore a type of order.

Additionally, every warrant originates with an order. As Directive #15-08 notes, "The Court has discretion to order the issuance of a warrant ..." Id. at 6.3 Even if they were legally distinguishable, every warrant originates with an order. Legal semantics that do not withstand scrutiny should not serve to perpetuate the ongoing violation of plaintiffs' basic right to be notified before this "consequence of magnitude" is imposed.

Finally, defendants' position as to this issue defies common sense. When an obligor is suspended via an in-court order, he or she is obviously present and advised of the suspension. No additional notice from the MVC would therefore be required. Conversely, when a warrant is issued "without further notice", the

<sup>&</sup>lt;sup>2</sup> Citing not only to case law but to law review articles, attorney websites, and other general reference materials, a Google search of the phrase "an arrest warrant is an order" provides 14,400 results bearing that exact phrase.

<sup>&</sup>lt;sup>3</sup> See also, box 17, page 2 of the form Title IV-D order, "ordering" the issuance of a warrant (E.g., Exhibit C-13).

obligor has no notice of the suspension. Defendants' position — that the legislature intended that only obligors who have already received notice at a hearing are covered by the statute, and those who are suspended "without additional notice" via the issuance of a warrant are not — simply makes no sense. A statute should never be construed in a manner which leads to such a manifestly absurd result. Turner v. First Union Nat. Bank, 162 N.J. 75, 84, (1999) (citing Watt v. Mayor of Franklin, 21 N.J. 274, 278 (1956)); Cornblatt v. Barow, 153 N.J. 218, 242 (1998).

# D. This matter is cognizable under the New Jersey Civil Rights Act.

In its surreply, defendants argued "[a]lthough the issue complained of by Plaintiffs appears to be enforcement related and not aimed at the constitutionality of the Act, no enforcement issue exists." (Exhibit B at page 12).

In relevant part, plaintiffs' complaint asserts a cause of action under The New Jersey Civil Rights Act of 2004 (NJCRA). N.J.S.A. 10:6-1 to -2. N.J.S.A. 10:6-2(c) specifically provides jurisdiction to seek enforcement of state statutory rights. The NJCRA protects against the deprivation of and interference with "substantive rights, privileges or immunities secured by the Constitution or laws of this State" (Emphasis added). The NJCRA is thus a vehicle to protect and vindicate both constitutional and statutory rights and the bald claim that "there is no enforcement issue" is without support.

To determine whether a statutory violation is actionable under the NJCRA, plaintiffs must establish that the statute at issue was intended to confer a benefit on plaintiffs...; (2) whether the benefit is not "so 'vague [or] amorphous' that its enforcement would strain judicial competence"; and (3) whether the law unambiguously imposes a binding obligation on defendants. See Tumpson v. Farina, 218 N.J. 450, 473 (2014), citing Blessing v. Freestone, 520 U.S. 329, 340-341 (1997).

The existence of these factors here should be self-evident. The purpose for the notice requirement of N.J.S.A. 39:5-30 and 2A:17-56.44 is to provide fairness, due process, to alert suspended obligors so they will cease driving, and to provide an opportunity for those erroneously suspended to rectify the error. This (1) provides a direct benefit to plaintiffs, (2) is not in any way "vague [or] amorphous", and (3) imposes a binding obligation on the MVC to provide fair notice before a suspension is effective.

In addition to the direct text of the statute requiring that the "20 day window" be provided, every case to address the issue has affirmed what would appear to be a common sense fairness and due process issue: It is mandatory that the State provide adequate notice before suspending a license, rather than leaving a driver to discover the suspension by being arrested, issued a summons, having his/her vehicle towed, and incurring criminal penalties for Driving While Revoked. See, e.g., Bechler v. Parsekian, 36 N.J. 242 (1961); Parsekian v. Cress, 75 N.J. Super. 405 (App. Div. 1962); State v. Wenof, 102 N.J.Super. (Law Div. 1968).

The text of two statutes, along with basic notions of fundamental fairness, dictate that no person should learn of a suspension by being charged criminally, incurring fines and penalties that make it more difficult to pay support, incurring an additional punitive license suspension as a result of a Driving While Revoked conviction, and having their vehicle towed.

As set forth in the annexed certifications, all of the named plaintiffs are on two week bench warrant status. All of them have arrears that exceed the amount of support due for two weeks. Therefore, any of them could be suspended pursuant to the procedures in Directive #15-08 "without additional notice." 4

Leaving for another day the overall constitutionality of this process, there can be no question that all of them have a cognizable right under the NJCRA to receive the statutorily-mandated 20 day notice before a suspension is effective.

<sup>&</sup>lt;sup>4</sup> Directive #15-08 actually permits the issuance of a warrant based on the existence of any arrears whatsoever at any time - it does not restrict this to only those cases where an obligor has defaulted on a two week warrant status order: "B-1. Two Types of Hearings. To coerce payment from an obligor who has become delinquent . . . the court may conduct a hearing to enforce litigant's rights under  $\underline{R}$ , 1:10-3. The obligor's appearance for an Expedited ELR hearing may be compelled by either the issuance of a warrant or a notice to appear."  $\underline{Directive}$  #15-08 at page 4.

### Conclusion

For the above reasons, plaintiffs respectfully aver that there are no material fact questions relevant to the singular issue now before the Court. The Court should enter partial summary judgment and require the MVC to immediately begin complying with N.J.S.A. 39:5-30 and N.J.S.A. 2A:17-56.44 by providing 20 days notice to obligors before a license suspension is effective.

Respectfully,

David Perry Davis, Esq.

Cc: Shana Bellin, DAG, Esq. (Via hand delivery and PDF)
Named plaintiffs (Via PDF)

From: Katherine Howard < Katherine. Howard@dhs.state.nj.us>

To: "David Perry Davis, Esq." <dpd@FamilyLawNJ.pro> Subject: RE: OPRA request W95220

Hello Dave. As per our phone conversation, please disregard the driver's license suspension data sent to you on March 19, 2015.

Please let me know if you have any questions/concerns regarding the following responses from DFD:

- 1. Can you please either confirm that there is no data prior to 2010 in the system, or, if there is, send the data for the previous years? As indicated, I am interested in seeing the jump in 1997-1998 when the "automatic suspension" provision was added into N.J.S.A. 2A:17-56.41. The previous system, ACSES, was decommissioned in 2009. Monthly reports for 2009 only were located within the archived files. The data provided is from NJKiDS following the first year of full implementation.
- 2. Finally, can you please confirm the statement that "All driver's licenses were suspended as a result of a bench warrant"?

The driveractms license (DL) suspension data previously provided were found to be inaccurate. The table below contains driver's license suspension data for calendar years 2010-2015 and indicates DL suspensions as a result of a bench warrant (BW), a hearing (H) and both a bench warrant and hearing.

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	Year 2010	Year 2011	Year 2012	Year 2013	Year 2014
Driver's Licenses	18668	21037	20483	22024	20498
From BW	18,546.00	20,935	20,433	21,907	20,381
From H	114	97	41	109	108
Both BW & H	8	5	9	8	9

From: David Perry Davis, Esq. [mailto:dpd@FamilyLawNJ.pro]

Sent: Monday, March 23, 2015 12:52 PM

To: Katherine Howard

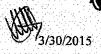
Subject: Re: OPRA request W95220 & C95650

Kate -

Thanks!

On the second one (below, clarified), are you confirming that there's no additional years available aside from what was supplied (2010-2014)?

Also, you sent a chart with the number of suspensions -- was that from a document / report or anything, or just your review of data from the NJKIDS computer? (You indicated "DFDAe â, TMs Response: The following NJKiDS data. All drriver's licenses were suspended as a result



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A cost (5-5)

AMP N

From: "Bruno, Joseph" <Joseph.Bruno@mvc.nj.gov>
To: "David Perry Davis, Esq." <dpd@FamilyLawNJ.pro>
Subject: RE: OPRA request C93813

\* Active = Suspension in effect. The individuals suspended for being delinquent in paying child support .

\* Requirements satisfied = the individual satisfied the order and demonstrated as much to the MVC thus changing the suspension status from "Active" to "Requirements Satisfied."

\*Inactivated = Suspended in error. The nature of the error originates with the court.

\* Total Posted = The total suspensions for Child Support - for example in 2014 there were 45,634 suspensions. 37,455 of those suspensions were satisfied. 202 other child support suspensions were inactivated. 7,977 remained active.

From: David Perry Davis, Esq. [mailto:dpd@FamilyLawNJ.pro]

Sent: Wednesday, April 22, 2015 11:38 AM

To: Bruno, Joseph

Subject: Re: OPRA request C93813

Joe -

I'm not clear on the meaning of the below chart ("active" / requirements satisfied" / Inactivated" and "total posted").

I'd asked for (see below) the number of erroneous suspensions - where MVC later removed or rescinded a suspension because, for example, the obligor was incorrectly named in the suspension order or any other error was involved. That's what was worth the \$245 fee... Is this chart saying that 202 suspensions were erroneous in 2014, 273 in 2013, etc? Is that what "inactivated" means?

Can you clarify? If this isn't the information I was seeking, can you please expedite? As said, getting this of info (and a couple of other things from other agencies) is that last thing we're waiting for to file the suit on automatic CS suspensions.

Thanks again for all your help,

Please confirm that you received this email and referenced attachments (if any).

- Dave

David Perry Davis, Esq.

www.FamilyLawNJ.pro

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20



# State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO Lt. Governor OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
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JOHN J. HOFFMAN Acting Attorney General

MICHELLE L. MILLER
Acting Director

July 17, 2015

# Via Fax (609)571-4463 and Hand Delivery

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

Re: Kavadas v. Martinez

Docket No. MER-L-1004-15

Dear Judge Jacobson:

I represent Defendants Raymond P. Martinez, the New Jersey Motor Vehicle Commission, John J. Hoffman, Esq., the State of New Jersey, Natasha Johnson and the Department Services, Division οf Family Development, Office of Child Support Services in the above-captioned matter. Please accept. this letter brief in response to Plaintiffs' reply brief dated July 13, 2015.

#### PRELIMINARY STATEMENT

Defendants continue to rely on the primary arguments made in their Opposition to Plaintiffs' Order to Show Cause. However, Plaintiffs have made numerous statements in their Reply



(8)

Brief with which Defendants disagree. The majority of these statements assert that Defendants have "waived" arguments because Defendants never briefed those arguments in the Opposition Brief. For example, Plaintiffs claim that loudest silence [in Defendants' Opposition Brief] is how the use of automatic license suspensions is counterproductive to the purpose of enforcing child support . . . " and later claims that Defendants never responded to the voluminous statistics and studies Plaintiffs have provided in their submissions.

Defendants will not address these statements in this surreply as Defendants' consistent position has been, and remains,
that these arguments are irrelevant to the central issue of this
case - the constitutionality and enforceability of various
provisions of the New Jersey Child Support Program Improvement
Act.

In addition to the minor points discussed above, Plaintiffs have argued two points in particular that ultimately fail. The first issue is the requirement that a court appoint counsel in cases where a noncustodial parent is in arrears on child support. The second issue is a novel yet meritless position that a conflict exists in the contested statutory scheme.

#### ARGUMENT

#### POINT I

NEW JERSEY CASE LAW DOES NOT REQUIRE APPOINTMENT OF COUNSEL TO INDIGENT OBLIGORS FACING DRIVERS' LICENSE SUSPENSIONS FOR FAILURE TO PAY CHILD SUPPORT.

In their Reply Brief, Plaintiffs argue that New Jersey case law requires the appointment of counsel to an indigent obligor when he or she faces a license suspension for failure to pay child support, relying primarily on the decision in Pasqua v. Council, 186 N.J. 127 (2006). Although Plaintiffs argued that counsel must be appointed in their initial brief, Plaintiffs acknowledged early in that brief that this case does not challenge the type of warrant at issue — a warrant providing for the incarceration of an obligor — and relied on Pasqua to describe the not—at—issue warrant. Pl. Br., p. 19, fn 4. In fact, Pasqua only applies in cases where an obligor faces incarceration as a result of failure to pay a child support obligation. Id. at 141-144.

The other two New Jersey cases that Plaintiffs cite to in support of their argument involved disorderly person and petty offenses and are distinguishable from this matter. See State v. Moran, 202 N.J. 311 (2010); Rodriguez v. Rosenblatt, 58 N.J. 281 (1971).

The sole fact that New Jersey Courts have held a license suspension to be a "consequence of magnitude" does not trigger an automatic right to counsel. In Rodriguez, cited by Moran, supra, the Court reviewed an appeal from a municipal court decision on the issue of whether an indigent defendant was entitled to the appointment of counsel against a disorderly persons charge. Id. at 283. The Court proceeded "under the assumption that no controlling Supreme Court determination [exists] that all indigent petty offenders are constitutionally entitled to assigned counsel without cost." Id. at 287. Court continued to discuss the need for balancing the offense at issue and the burden on the judiciary and quoted a federal case, Creighton v. State of North Carolina, which stated: "However, unfortunate as it may seem to some, we live in a society where practical considerations must be taken into account. It seems obvious that counsel must be appointed to represent an indigent on trial for his life; it seems equally obvious that it is untenable to appoint counsel for an indigent who has parked too near a fireplug. Somewhere in between these two extremes a line must be drawn." 257 F. Supp. 806, 808 (E.D.N.C. 1966).

As it relates to driving privileges, the Court held that a Court only must assign counsel in cases where a "substantial loss of driving privileges" is at issue. Rodriguez, supra, 58 N.J. at 295. Here, the consequence of a driver's license

suspension is not a permanent one or imposed for a definite period of time, as would be the case in a criminal or disorderly persons matter. Here, the driver's license suspension is temporary and removable upon payment of child support arrearages and a fee. The loss cannot be considered "substantial" for purposes of the need to assign counsel. Further, the holding in Rodriguez applied to proceedings in municipal court, not those matters in the Superior Court - Chancery Division, Family Part.

While State v. Moran does recognize that the loss of driving privileges could be a "consequence of magnitude" that requires the appointment of counsel, it did so in the context of a criminal reckless driving conviction and in light of and with concern for the inconsistent sentencing guidelines in effect at the time of decision. 202 N.J. 311, 325 (2010).

The decision in <u>Pasqua</u> was premised on Fourteenth and Sixth Amendment concerns that "a litigant may lose his physical liberty if he loses the litigation." <u>Pasqua, supra,</u> at 142 (<u>citing Lassiter v. Dep't of Soc. Servs., supra, 452 U.S.</u> 18, 25 (1981)). In *dicta*, Justice Albin recognized that the right to counsel could be required for the loss of general "motor vehicle privileges," but the Court neither held so nor specified in which cases such accommodations must be provided. <u>Id.</u> at 147. When <u>Pasqua</u> relied upon cases such as <u>Rodriguez</u>, it cannot be concluded here that <u>Pasqua</u>, which applied to circumstances where

an individual faced incarceration, automatically applies to a driver's license suspension imposed only until arrearages are paid. Such a loss of privilege is not "substantial", a requirement in <u>Rodriguez</u>, but temporary and subject to almost immediate restoration as long as the arrearages are paid. While <u>Pasqua</u> disagreed with a "prisoner-holds-the-key-to-the-jailhouse-door" argument, the reasoning for doing so hinged specifically on the restrictions placed upon an obligor once he or she was incarcerated.

Rodriguez defined "substantial the loss of driving privileges" as a "consequence of magnitude". The Supreme Court's use of the adjective "substantial" is pivotal here. Neither Pasqua nor Moran have defined "substantial" nor the difference between "loss of driving privileges" and a а "substantial loss οf driving privileges". Neither discussed whether counsel must be appointed for a "substantial loss of driving privileges". The universe of case law utilizing the term "substantial loss of driving privileges" is extremely In the majority of cases, the issue arises criminal context where the underlying offense was driving while intoxicated or reckless driving. See, e.g., State v. DeLorenzo, 210 N.J. Super. 100 (1986) (municipal court traffic offenses);

A general search of the term "substantial loss of driving privileges" in New Jersey on LexisNexis only turns up 16 results as of July 15, 2015.

State v. Rodriguez, 294 N.J. Super. 129 (Law Div. 1996). Other cases cited in Plaintiffs' initial brief relate to appointment of counsel where a different "consequence of magnitude" was recognized. See N.J. Div. of Youth & Family Servs. v. B.R., 192 N.J. 301 (related to termination of parental rights); Doe v. Poritz, 142 N.J. 1, 31 (1995) (related to rights of convicted sex offenders). The Guidelines for Determination of Consequence of Magnitude only applies as guidance for municipal court judges deciding cases in their jurisdiction and is inapplicable here. Pressler, Current N.J. Court Rules, Appendix to Part VII to R. 7:3-2 at 2309 (2015 Edition).

Plaintiffs' proposed requirement would impermissibly impose significant structural and wide ranging implications in the notable absence of any specific law providing Plaintiffs cannot impose public and judiciary a on the requirement to provide appointed counsel for hearings that were not statutorily conceived of until the 1990's with the passage of the Child Support Program Improvement Act1 (the "Act"). Plaintiffs' arguments simply combine favorable and isolated excerpts of case law from the New Jersey Supreme Court that are completely divorced from its context and time. The New Jersey Supreme Court in Pasqua ruled specifically on the appointment of

<sup>&</sup>lt;sup>2</sup> The Child Support Program Improvement Act became effective March 5, 1998.

counsel to indigents in cases where incarceration was the consequence for failure to pay child support. Armed with the knowledge that the Act also provided for the lesser consequence of license suspensions in certain cases, the Court could have specifically stated that the Fourteenth Amendment appointment of counsel in those cases as well. However, the Court merely stated, without commenting on "substantial loss of driving privileges" (emphasis added) required by Rodriguez: "We can find no principled reason why an indigent facing loss of motor vehicle . . . would be entitled to counsel under state law but an indigent facing jail for allegedly willfully refusing to pay a child support judgment would not." Pasqua, supra, 186 N.J. at 149. The Supreme Court utilized this analogy not to expand the holding of Rodriguez to apply to any loss of driving privileges (versus a "substantial" loss), but merely to bolster its argument that the right to appointment of counsel should attach for a far more severe consequence.

Further, by relying on <u>Rodriguez</u>, the Supreme Court only intended this "loss of driving privileges" to apply to those cases envisioned by <u>Rodriguez</u>, and those which have since relied on <u>Rodriguez</u> to require counsel, i.e. moving violations, disorderly conduct and petty offenses, and drunk driving offenses, not the very specific act at issue here - the repeated failure to pay child support and comply with court orders. To

hold otherwise here would be to read the Supreme Court's decision to expand to an entire group of individuals whose case was not before the Court in <a href="Pasqua">Pasqua</a> and who did not exist at the time of the Rodriguez decision.

Even if this Court finds that a right to appointment of counsel attaches, such а finding does require not the invalidation of a statute. It is axiomatic in our jurisprudence that every statute be presumed constitutional unless proven otherwise. See, e.g., United States v. Booker, 543 U.S. 220, 280 (2005) (reasoning that, when reviewing legislation, a court must presume that legislators can and will apply the statute consistently with the constitutional command") (internal citations omitted); see also United States v. Morrison, 529 U.S. 598 (2000)(holding that establishing a statute bę unconstitutional requires a defendant to make a "plain showing that Congress has exceeded its constitutional bounds"). statutes at issue are silent as to the appointment of counsel. Even if this Court finds that such a right to appointment of counsel attaches in these cases, that finding would not meet the requirement of showing that the New Jersey Legislature exceeded its constitutional bounds in writing the statute. finding would be controlling on the New Jersey Judiciary or the Administrative Office of the Courts, neither of which parties to this suit.

#### POINT II

## A STATUTORY CONFLICT DOES NOT EXIST.

Plaintiffs' assertion that N.J.S.A. 2A:17-56.41(a) contains conflicting language is based upon a fundamental misunderstanding of the law. Plaintiffs point out the following portions of N.J.S.A. 2A:17-56.41(a) which he believes conflict:

If [arrears exist] or the obligor fails to to a subpoena relating paternity or child support action or a child support related warrant exists, and the obligor is found to possess a license in the and all appropriate enforcement methods collect to the child support arrearage have exhausted... been the Probation Division shall [advise] the obligor that the obligor's license may be revoked or suspended unless, within 30 days of the postmark date of the notice, the obligor pays the full amount of the child support arrearage, or provides proof that health care coverage for the child has been obtained, or responds to a subpoena, or a written request for a court hearing to the Probation Division. The obligor's driver's license shall be suspended by operation of law upon the issuance of a child support related warrant. . .

Drivers' licenses are not the only licenses which the Motor Vehicle Commission can suspend for failure to pay child support.

N.J.S.A. 2A:17-56.8 states, in pertinent part: "[A written notice accompanying a child support order] shall also state that the driver's license and professional or occupational licenses, or recreational or sporting license [] held or applied for by the obligor may be denied, suspended or revoked. . . ." Thus,

professional, occupational, recreational and sporting licenses are also subject to suspension for failure to comply with a support order.

The first bolded sentence of N.J.S.A. 2A:17-56.41(a) applies to enforcement action taken with respect to these other forms of licenses and not to drivers' licenses. The New Jersey Legislature clearly delineated that an automatic license suspension only occurs in the context of driver's licenses when it states in the second bolded sentence, "the obligor's driver's license shall be suspended by operation of law upon the issuance of a child support-related warrant." N.J.S.A. 2A:17-56.41(a) (emphasis added).

Rule 5:7-4(f) further clarifies this distinction. R. 5:7-4(f)(4) specifically discusses the suspension process as it pertains to professional and occupational licenses; R. 5:7-4(f)(5) specifically discusses the suspension process as it pertains to a sixth month arrearage; and R. 5:7-4(f)(6) discusses driver license suspensions by operation of law. The distinction is clear, and thus, no statutory conflict exists.

New Jersey's Office of Child Support Services has operationalized this program for treatment of different licenses and recognizes the distinction as recognized above. For the foregoing reasons, any assertions that the applicable portions of the Act should be invalidated on this basis must be rejected.

#### POINT III

THE REQUIREMENT THAT A SUPPORT-RELATED SUSPENSION BE EFFECTIVE 20 DAYS AFTER POSTMARK OF NOTICE IS INAPPLICABLE TO THE FACTS HERE.

Plaintiffs state that "defendants do not even address that the [MVC] has not complied with N.J.S.A. 2A:17-56.44 by making a support-related license suspension effective '20 days after the postmark of the notice.'" Pl. Br., p. 23. Although the issue complained of by Plaintiffs appears to be enforcement related and not aimed at the constitutionality of the Act, no enforcement issue exists.

As asserted in Point II, procedures for suspensions of licenses other than a driver's license exist in the Act. N.J.S.A. 2A:17-56.44 applies primarily to these licenses and does not apply to the suspension of drivers' licenses as the result of an issuance of a warrant. Any reference to this specific provision in Defendants' Opposition Brief arguing that these requirements apply specifically to drivers' license suspensions was likely a typographical error.

New Jersey Statute 2A:17-56.41(a) sets forth two different methods by which a driver's license may be suspended due to non-payment of child support. A driver's license may be suspended if there is a six month arrearage in child support payments and after the Probation Division sends a notice to the obligor that

he/she is in arrears. This notice starts a procedure in the court system whereby if the arrearage is not satisfied, the court will enter an order suspending the license. The other method by which a driver's license will be suspended is by the issuance of a warrant. N.J.S.A. 2A:17-56.41(a) (stating that "[t]he obligor's driver's license shall be suspended by operation of law upon the issuance of a child support-related warrant.")

New Jersey Statute 2A:17-56.44 states that "[u]pon the receipt of an order requiring the suspension or revocation of a license, the licensing authority shall immediately notify the licensee of the effective date of the suspension, which shall be 20 days after the postmark of the notice . . ". The Legislature was clear in its language that the 20 days' notice given by the licensing authority, here the MVC, applies when the court orders the suspension of a license, not when a warrant is issued suspending a license. Thus, when a warrant is issued suspending a driver's license, the MVC is not required to provide the licensee with 20 days' notice. As stated in N.J.S.A. 2A:17-56.41(a), the driver's license is suspended by operation of law when a warrant is issued.

Rule 5:7-5(e) lays out the procedure for suspension and revocation of licenses for failure to provide support. This rule does not require notice prior to the suspension of a

driver's license as the result of the issuance of a warrant. The <u>Rule</u> states:

If the court issues a warrant for the obligor's arrest for failure to pay child support as ordered, or for failure to appear at a hearing ... to establish child support, or for failure to appear at a child support hearing to enforce a child support order, and said warrant remains outstanding, the Probation Division shall immediately notify [the MVC] of the warrant and the requirement to suspend the obligor's driving privileges pursuant to N.J.S.A. 2A:17-56.41.

R. 5:7-5(e)(1).

The Rule later states:

If the court issues an order suspending or revoking a license pursuant to paragraph (e) of this Rule, the Probation Division shall forward a copy of the order to the obligor and all appropriate licensing authorities.

R. 5:7-5(e)(5)

The only portion of this <u>Rule</u> which refers to a 20-day period is the section entitled "Relief from Suspension or Revocation Due to Mistaken Identity". The rule states:

If the licensee, upon receipt of the notice of suspension or revocation from the licensing authority, disputes that he or she is the obligor, the licensee shall notify the licensing authority and the Probation Division by registered mail within 20 days of the postmark date of the notice and request a hearing.

R. 5:7-5(e)(6).

The notification requirement that Plaintiffs refer to is inconsistent with the mandate of N.J.S.A. 2A:17-56.41, requiring a driver's license by operation of law. The 20 days' notice does not apply when a warrant is issued. Furthermore, the purpose behind the 20 days' notice is to give the obligor the opportunity to challenge an order suspending his/her license if licensee asserts that he/she is not obligor, i.e., a case of mistaken identity. Here, no plaintiff has asserted that he/she is not the obligor in question. Thus, Plaintiffs' argument should be dismissed.

#### POINT IV

#### CLARIFICATION

Plaintiffs repeatedly quote a statement in Defendants' Opposition Brief, which reads: "invalidation of the license-suspension provisions in the Act will require a change in policy in practice in New Jersey that is less punitive and more closely aligned with federal trends". Plaintiffs read this out of context. Regardless of what the goal of the statute is, or whether it is more aligned with federal trends, however, is not relevant to this matter. The relevant issue here is whether or not the statute is constitutional as written. Any other policy issues are more properly addressed to the State's Legislature and Plaintiffs' reliance on this out-of-context statement should have no bearing on this Court's decision.

#### CONCLUSION

For the foregoing reasons, Defendants' respectfully request that Plaintiffs motion for a preliminary injunction be denied and that the Verified Complaint in this matter and any and all claims against Defendants be dismissed with prejudice.

Respectfully submitted,

JOHN J. HOFFMAN ACTING ATTORNEY GENERAL OF NEW JERSEY

By: Shana Bellin (907512012)

Deputy Attorney General

cc: David Perry Davis

via electronic mail

#### The Law Office of

David Perry Davis 112 West Franklin Ave Pennington NJ 08534 (609) 737-2222 (609) 737-3222 (fax) Attorney ID: 047451996 Attorney for plaintiff class

Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, Paulo : CHANCERY DIVISION Arede, individually and on behalf of all persons similarly : DOCKET NO. MER-L-1004-15 situated,

Plaintiffs

vs.

Raymond P. Martinez, in his official capacity as Chief Administrator of the New Jersey Motor Vehicle Commission, and The New Jersey Motor Vehicle Commission,

John Jay Hoffman, Esq., in his official capacity as Acting Attorney General of the State of : New Jersey, and The State of New: Jersey,

Natasha Johnson, in her official capacity as Director of the Department of Human Services, Division of Family Development, Office of Child Support Services, and Department of Human Services, Division of Family Development, Office of Child Support Services,

Defendants

: SUPERIOR COURT OF NEW JERSEY : MERCER COUNTY

Civil Action

CERTIFICATION OF ANDREANA KAVADAS IN SUPPORT OF APPLICATION FOR PARTIAL SUMMARY JUDGMENT

Andreana Kavadas, of full age, being duly sworn, hereby certifies as follows:

- 1. I am a named plaintiff in the above-captioned matter and make this certification in support of the within application. I am personally familiar with all the facts alleged herein.
  - 2. I am a child support obligor and am in arrears. I also

have custody of Dillinger Brian Andrews (who is 3), and Julian Saint Andrews (18 months). I do not receive child support for Dillinger and Jullian, but have an obligation to pay support for Phoenix, who lives with his father's family. As a result of my arrears, I am have been subject to many automatic license suspensions as the result of the entry of a warrant. I will recount only one recent one here.

- 3. In July of 2014, I filed a pro se application asking to be removed from two week bench warrant status. I explained that I had a breast-feeding infant and a three year old (Exhibit C-5). I have no day care for my three year old son. I am unemployed and receive WIC and food stamps. I no longer receive TANF only because I maxed out on receiving those benefits. The court denied my application, finding that \$173 per month (\$40 per week) "is a minimal obligation" (Exhibit C-7). I do not have \$173 per month. It is not a "minimal" amount to me.
- 4. I regularly receive "Notice of Delinquency" and "Notice of Intent to Issue Bench Warrant" notices such as those attached (Exhibit C-8 through C-27). Sometimes they come every month, sometimes it will be many months before one arrives. The notices state that I can call "Customer Service" to discuss my status. The only suggestion they have ever given (aside from urging me to pay money I don't have or, on one occasion, demeaning me for choosing to keep a pregnancy) is to file a motion. As indicated above, I have filed a modificatin motion and it was denied.
- 5. The notices do not contain a specific date that a warrant will be entered or license suspension will be imposed. As I am always in arrears, I never know when a warrant will be issued.
- 7. On February 10, 2015 I received a "Notice of Delinquency." (C-25). The Notice states, in part, that "continued non-compliance

may result in court proceedings..." On the very same day as the notice informing me that some action "may" occur in the future, with no additional notice or warning, a warrant was issued (C-28, C31). I was notified of this via a notice from the MVC prepared two days later on February 12 and received on or about February 15 (C-28). About a month later, I was arrested on the warrant and my mother paid \$150 toward my arrears to save me from going to jail again (C-31).

- 7. I have learned of past suspensions by being pulled over by the police and being informed that my license was suspended. This occurred, on one occasion, when I was seven months pregnant. If I received a warning that a suspension was coming and if a hearing was held, I would have and could have shown that it would not have helped me to pay support it would hurt my ability to do so, and would hurt my ability to care for my young children who live with me. If I received a notice that my license was going to be suspended on a certain date (or that a suspension would not be effective until a certain date), I would refrain from driving until I could get to court and address the issue.
- 8. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

DATED: 21915

Andreana Kavadas

(1)

#### ATTORNEY CERTIFICATION PURSUANT TO R. 1:4-4 (c)

David Perry Davis, of full age, hereby certifies as follows

- 1. I am an attorney at law of the State of New Jersey. I represent the plaintiffs Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, and Paulo Arede in this matter.
- 2. I was not able to personally meet with my client to obtain a signature. However, my client has authorized me to affix their signature and has acknowledged the genuineness of the signature to me.
- 3. I am filing this certification so that the Court may accept the signature as if it were an original. An original signature will be filed if requested by the Court or another party.
- 4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

DATED: 8/20/2015

David Perry Davis, Esq.

C-4

# SUPERIOR COURT OF NEW JERSEY:

CHANGERY DIVISION, FAMILY PART SOMERSET COUNTY PO BOX 3000 NO.BRIDGE HIGH STREET

SOMERVILLE, NJ 08876-1262 Website: www.njchildsupport.org



Fax:

Docket Number FD-18-000123-08

PIETRANGELO DAVID

Plaintiff		Case ID: CS50434431B			
Vs. KAVADAS ANDREANA Defendant					
	LICATION FOR POST-DISPOSITI	ON RELIEF			
Plaintiff Address: 246 E CAMPLAIN RD MANVILLE, NJ 08835-1406 US	Additional Relie	Order Dated: 12/23/2008 f   Order Dated: 12/23/2008			
Defendant Address: 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514 US	Relief:  Parenting Time Custody Paternity Support Increase Support Decrease Support X Terminate Support Medical Support Emancipation Relocation X Other	rt: ort			
The children are:	*				
Name	Date of Birth	Residing with			
PIETRANGELO, PHOENIX	11/27/1998	DAVID PIETRANGELO			
A hearing is being requested because:	Pietrangelo's arrears only support order with this one, I have two separate orders for the same child. I would like the stipulation that I will be arrested if payments are missed lifted. I have a breastfeeding infant and 3 year old in my care. I would like the venue for enforcement to be Cumberland County I am requesting a suspension of payment for at least a year. I have also requested this modification in Cape May County. I am unemployed but have been seeking employment." If you wish to receive the papers filled in support of this application please call 1-877-655-4371. "Signature on file."				
Certification (Rule 1:4-4(B)): I certify that oregoing statements made by me are w	the foregoing statements made by iffully false, I am subject to punishr	/ me are true. I am aware that if any of the nent.			
MICHELLE HEADLEY	07/07/2014				
Vitness	Date	Plaintiff  Defendant / Counterclaimant			

CS558,34349717

355\MIGHELLE.HEADLEY\CS50434431B\51411701

	KAVADAS ANDREANA DEFENDANT	SUPERIOR COURT OF NEW JERSEY Grancery Divisions family Part ORDER
	bligerObligee	COUNTY: SOMERSET COUNTY
HEARING DATE 08/29/2014	WELFARE/ULF.S.A.#	DOCKET#: FD-18-000123-08 CS#: CS504344431B
With appearance by:   ☑IV-D Atty	Atty for PL	X DEF Atty for DEF
This matter having been opened to the or Probation Division Family Division Visitation Custody  Enforcement Modification / Incr	for an ORDER for: The Pater	
1. State with Continuing Exclusive Ju	irisdiction:NEW JERSEY	
CHILD'S NAME	BIRTHONIE	GHILD S NAME
2A. PIETRANGELO PHOENIX	11/27/1998	20,
2B.		2E.
20.		2F.
PATERNITY of child(ren) (#     A Certificate of Parentage ha		y established and an ORDER of paternity is hereby entered.
		above.
5. IT IS HEREBY ORDERED T	HAT: The obligor shall pay su	pport to the New Jersey Family Support Payment Center in the amount of:
	t	payable effective
Aild Support Spousal Support	Arrears Payment	Total Frequency Date
	'보고하게 하다'도 말하는 데 하면 목가 나를 하는 것이 된 중요 나라요. 모든	ost-of-living adjustment in accordance with R. 5:6B
6. Child Support Guidelines Ord		
6A. Worksheet attached.	T The Mario	
	istered and enforced by the P	robation Division in the county of Venue, CUMBERLAND COUNTYCounty.
		upon amounts and effective date noted above and total
<b>1.7</b> 1 <b>\$</b>		
<ol> <li>ARREARS indicated in the re</li> </ol>	cords of the Probation Divisio	n, are \$ 11,564,00as of 08/29/2014
<ul><li>(0. GROSS WEEKLY INCOMES OBLIGEE \$</li></ul>	of the parties, as defined by	the Child Support Guidelines, upon which thisORDER is based: OBLIGOR \$
11. INCOME WITHHOLDING is I	nereby ORDERED on current	and future income sources, including:
1INCOME WITHHOLDING is I Name of income	나를 생산했다.무슨 사람들이 가장 없는데 가장하셨다면 하는 그 없다는 점점점점점점	and future income sources; including: Address of income source:
aliani Marija Alian arawatan ingga kabuta dibi babib	나를 생산했다.무슨 사람들이 가장 없는데 가장하셨다면 하는 그 없다는 점점점점점점	
Name of income :	source:	Address of income source:
Name of income :  OBLIGOR SHALL, however, r	source: 	Address of income source:  that the full amount of support and arrears is not withheld.
Name of income:  OBLIGOR SHALL, however, r  Medical Support coverage as  ohild(ren) spouse, i	source:  make payments AT ANY TiMi s available at reasonable cost by Obligor  ○ Ob	Address of income source:  that the full amount of support and arrears is not withheld.  shall be provided for the ligger 1 Both 1
Name of income:  OBLIGOR SHALL, however, r  Medical Support coverage as  ohlid(ren) spouse, i	source:  make payments AT ANY TiMI s available at reasonable cost by Obligor  Ob ursable health care expenses	Address of income source:  That the full emount of support and arrears is not withheld.  Shall be provided for the ligee  Both  source:  of the child(ren) which exceed \$250.00 per child per year as follows
OBLIGOR SHALL, however, r  OBLIGOR SHALL, however, r  Medical Support coverage as child(ren) spouse, l The parties shall pay unreimbr	nake payments AT ANY TiMi s available at reasonable cost by Obligor ☐ Ob ursable health care expenses % Obligor	Address of income source:  That the full amount of support and arrears is not withheld.  Shall be provided for the ligee  Both  source:  of the child(ren) which exceed \$250.00 per child per year as follows  % Obligee
Name of income:  OBLIGOR SHALL, however, r  Medical Support coverage as child(ren) spouse, i  The parties shall pay unreimble pursuant to R 5:6A the oblig	nake payments AT ANY TiMi s available at reasonable cost by Obligor  Ob ursable health care expenses % Obligor	Address of income source:  that the full amount of support and arrears is not withheld.  shall be provided for the ligee
Name of income:  OBLIGOR SHALL, however, r  Medical Support coverage as child(ren) spouse, i The parties shall pay unreimble	nake payments AT ANY TiMi s available at reasonable cost by Obligor Ob ursable health care expenses % Obligor res shall be responsible for al insurance LD, card(s) as p	Address of income source:  that the full amount of support and arrears is not withheld.  shall be provided for the ligee
Name of income:  OBLIGOR SHALL, however, r  Medical Support coverage as coverage as coverage as the parties shall pay unreimble payallability to the Probation Discoverage is available, Medicavallability to the Probation Discoverage is available, Medicavallability to the Probation Discoverage is available.	nake payments AT ANY TiMis available at reasonable cost by Obligor Obusable health care expenses % Obligor (se shall be responsible for all insurance LD, card(s) as purished the:	Address of income source:  that the full amount of support and arrears is not withheld.  shall be provided for the ligge Bath Bath Source:  of the child(ren) which exceed \$250.00 per child per year as follows  % Obligee  the first \$250.00 per child per year.
OBLIGOR SHALL, however, r  CBLIGOR SHALL, however, r  Medical Support coverage as child(ren) spouse, i The parties shall pay unreimble Pursuant to R 5:6A the oblig If coverage is available, Medicavailability to the Probation Directory.	nake payments AT ANY TiMis available at reasonable cost by Obligor Obligor Obligor School Decard(s) as purished by the:    Obligor   Obligor	Address of income source:  that the full amount of support and arrears is not withheld.  shall be provided for the ligee







#DOCKE	T# 50-19-000123-00	
	GENETIC TESTING to assist the court in determining paternity of the child(ren)(#) is hereby ORDERED. The county welfare agency or the foreign jurisdiction in the county of residence of the child shall bear the cost of said testing, without prejudice final allocation of said costs. If defendant is later adjudicated the father of said child(ren), defendant shall reimburse the welfare age for the costs of said tests, and pay child support retroactive to	to incy
13A. [	Issues of reimbursement reserved. 13B. Issue of retroactive order reserved.	
14. [	This matter is hereby: RELISTED for a hearing onbeforeA copy of this ORDER shall serve as the sum for the hearings. No further notice for appearance shall be given. Failure to appear may result in a default order, bench warrant, or dismissal. Reason for relist:	mon
15.	AN EMPLOYMENT SEARCH MUST BE CONDUCTED BY THE OBLIGOR. Written records of at least #employment contacts week must be presented to the Probation Division. If employed, proof of income and the full name and address of employer must be provided immediately to the Probation Division.	
18. [	SERVICE upon which this order is based:  Personal Service Certified Mail: Refused Regular Mail (not returned)  Date: Signed by: Returned Unclaimed Other;	
17. E	A BENCH WARRANT for the arrest of the obligor is hereby ORDERED. The obligor was properly served with notice for court appearance on, and failed to appear. (Service noted above). An amount of \$ shall be required for release	),
18.	EFFECTIVE FUTURE MISSED PAYMENT(S) numbering or more may result in the assuance of a warra without further riotics.	
19.	A LUMP SUM PAYMENT OF \$ must be made by the obligor by or a bench warrant may be issued without further notice.	ut
20.	This complaint / motion is hereby DISMISSED: (reason)	
21.	Order of Support is hereby TERMINATED effective as Arrears accrued prior to effect the case and frequency noted on page number one of this ORDER.	ectiv
22.	THIS ORDER IS ENTERED BY DEFAULT. The Cobligor Cobliges was properly served to appear for a hearing onand falled to appear. 22A Affidavit of Non-Military Service is filled:	
23. X		FO
- T	MODIFICATION OF THE CURRENT ORDER IS DENIED WITHOUT PREJDICE AS THE CURRENT ORDER OF \$40/WEL	Κi
	MINIMAL OBLIGOR PROVIDED DOCUMENTATION THAT SHE CURRENTLY RECEIVES FOOD STAMPS, BUT DOES	NO
	BECEIVE ANY TANE, SHE PROVIDED NO PROOF OF HER EFFORTS TO FIND EMPLOYMENT, PRIOR ORDER OF \$40/WEEK!	<u> 2LU:</u>
	\$25/WEEK TOWARDS ARREARS IS TO CONTINUE, DEFENDANT TESTIFIED THAT SHE IS SEEKING TO HAVE THE 2 PAYN	IEN
	MISSED BENCH WARRANT STATUS LIFTED. HOWEYER, CUMBERLAND COUNTY PROBATION IS ENFORCING THIS ORDE SHE IS REQUESTING THAT THE BENCH WARRANT STATUS BE LIFTED, SHE SHOULD CONTACT THE COUNTY ENFORCE	ING
	THIS ORDER, NJKIDS HAS ANOTHER ARREADS ONLY ORDER UNDER C\$50908824A, FD-05-80-05, IN THE AMOUNT OF	\$50
	WEEK FOR THE SAME PLAINTIFF, DAVID PIETHANGELO; SAME DEFENDANT, ANDREANA KAVADAS; AND SAME CI	HLD
	PHOENIX KAVADAS-PIETRANGELO. THE CAPE MAY COUNTY ARREARS ONLY ORDER IS TO BE CONSOLIDATED WITH	THIS
	CURRENT OBLIGATION, ARREARS UNDER CS50908824A IN THE AMOUNT OF \$6,067.68 ARE TO BE TRANSFERHED TO	1111
11 - 12 - 13 - 13 - 13 - 13 - 13 - 13 -	CASE, CS50434431B, FD-18-123-08.	
	EXCEPT AS PROVIDED HEREIN, ALL PRIOR ORDERS OF THE COURT REMAIN IN FULL FORCE AND EFFECT.  I hereby declare that I understand all provisions of this ORDER recommended by a Hearing Officer and I waive my right to an in-	diala
	appeal to a Superior Court Judge:	AICLIC
	DEFENDANT	
laden 111 i 40 elektri	and Patricks	i.
AINTIFF		
	FOR PLAINTIFF ATTORNEY FOR DEFENDANT	
4. TT	INTAKE CONFERENCE BY AUTHORIZED COURT STAFF;	
5. 🗖	The parties request the termination of all Title IV-D services and consent to direct payment of support. They are advised that all monitoring, collection, enforcement and location services available under Title IV-D of the Social Security Act are no longer in effect, understand I may reapply for Title IV-D services.	ľ.
	obiligee obliger	
	Copies provided at hearing to Obligee Obligor 26A Copies to be mailed to Obligee Obligor	
	TAKE NOTICE THAT THE NEW JERSEY UNIFORM SUPPORT NOTICES WHICH ARE PROVIDED IN APPENDIX XVI.OF THE RULES OF COURT, AND WHICH FOLLOW INCORPORATED INTO THIS ORDER BY REFERENCE AND ARE BINDING ON ALL PARTIES.	AFIE
	So Recommended to the Court by the Hearing Officer:	
	Date 08/29/2014 H.O. NANCY COYLE Nancy Coyle	
	Signature	
	So.Ordered by the Court 1997 and 1997	W.E
AND THE PARTY OF STREET	The state of the s	11. 11. 12.



Kavadas et al v. Martinez et al





#### SOMERSET COUNTY

Probation Division, Child Support Enforcement
PO BOX 3000
COURT HOUSE
SOMERVILLE, NJ 08876-1262
Website: www.njchildsupport.org



Fax:

**PIETRANGELO DAVID** 

Plaintiff X Obligee Obligor

VS.

KAVADAS ANDREANA

Defendant Obligee x Obligor

Docket No: FD-18-000123-08 Case ID: CS50434431B

Date: 07/29/2010

**NOTICE OF DELINQUENCY** 

ANDREANA KAVADAS 203W W MCNEAL ST APT 3 MILLVILLE, NJ 08332

Dear ANDREANA KAVADAS.

On 12/23/2008 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the SOMERSET COUNTY Probation Division in the sum of \$61.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was \$ 150.00, on 07/16/2010

Your account is in arrears of \$3,953.00 as of 07/29/2010

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at 1-800-621-KIDS (5437) or via the Internet <u>www.njchildsupport.org</u>

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please contact the Probation Division at (877)655-4371

Thank you for your immediate attention to this matter

KERI GNACEK
PROBATION OFFICER



C-8

Probation Division, Child Support Enforcement 4 MOORE RD CAPE MAY COURT HOUSE, NJ 08210-1654

Website: www.njchildsupport.org



(609)465-1090 Fax: (609)463-6470

Docket No: FD-05-000097-03

Case ID: CS53367960A

Date: 02/10/2011

GERRY WILLIAM P
Plaintiff X Obligee Obligor
vs.

KAVADAS ANDREANA
Defendant Obligee X Obligor

NOTICE OF DELINQUENCY

ANDREANA KAVADAS 203W W MCNEAL ST APT 3 MILLVILLE, NJ 08332

Dear ANDREANA KAVADAS,

On 07/02/2010 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTY Probation Division in the sum of \$40.00 MONTHLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$5.00, on 12/21/2010

Your account is in arrears of \$139.80 as of 02/10/2011

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at 1-800-621-KIDS (5437) or via the Internet <u>www.njchildsupport.org</u>

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please contact the Probation Division at (609)465-1090

Thank you for your immediate attention to this matter.

JOANN THOMPSON
PROBATION OFFICER



Probation Division, Child Support Enforcement 4 MOORE RD CAPE MAY COURT HOUSE, NJ 08210-1654 Website: www.njchildsupport.org



(609)465-1090 Fax: (609)463-6470

Docket No: FD-05-000097-03

Case ID: CS53367960A

Date: 07/18/2012

KAVADAS ANDREANA

**GERRY WILLIAM P** 

Defendant Obligee X Obligor

٧S.

Plaintiff x Obligee Obligor

#### NOTICE OF DELINQUENCY

ANDREANA KAVADAS ATTN: CHAD ANDREWS 203 W MCNEAL ST APT 3 MILLVILLE, NJ 08332-3738

Dear ANDREANA KAVADAS.

On 07/14/2011 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTY Probation Division in the sum of \$40.00 MONTHLY According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was \$ 50.00, on 07/08/2011

Your account is in arrears of \$89.80 as of 07/18/2012

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at 1-800-621-KIDS (5437) or via the Internet www.njchildsupport.org

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please contact the Probation Division at (609)465-1090

Thank you for your immediate attention to this matter.

JEROME MANSFIELD PROBATION OFFICER





Probation Division, Child Support Enforcement

60 W BROAD STREET BRIDGETON, NJ 08302-0438 Website: www.njchildsupport.org



(856)453-4600 Fax: (856)453-1824

Docket No: FD-18-000123-08

Case ID: CS50434431B

Date: 08/01/2012

# PIETRANGELO DAVID

Plaintiff X Obligee Obligor

VS.

KAVADAS ANDREANA

Defendant Obligee X Obligor

NOTICE OF DELINQUENCY

ANDREANA KAVADAS ATTN: CHAD ANDREWS 203 W MCNEAL ST APT 3 MILLVILLE, NJ 08332-3738

Dear ANDREANA KAVADAS,

On 12/23/2008 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CUMBERLAND COUNTY Probation Division in the sum of \$63.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$ 125.00, on 07/23/2012

Your account is in arrears of \$7,336.00 as of 08/01/2012

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at 1-800-621-KIDS (5437) or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please contact the Probation Division at (856)453-4600

Thank you for your immediate attention to this matter.

WARREN JOHNSON

INVESTIGATOR





Probation Division, Child Support Enforcement

4 MOORE RD

CAPE MAY COURT HOUSE, NJ 08210-1654

Website: www.njchildsupport.org



(609)465-1090 Fax: (609)463-6470

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 08/10/2012

# PIETRANGELO DANIEL J Plaintiff X Obligee Obligor vs. KAVADAS ANDREANA Defendant Obligee X Obligor

#### NOTICE OF DELINQUENCY

ANDREANA KAVADAS ATTN: CHAD ANDREWS 203 W MCNEAL ST APT 3 MILLVILLE, NJ 08332-3738

Dear ANDREANA KAVADAS.

On 07/24/2012 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTY Probation Division in the sum of \$50.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$683.00, on 07/23/2012

Your account is in arrears of \$ 6.147.68 as of 08/10/2012

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at 1-800-621-KIDS (5437) or via the Internet <u>www.njchildsupport.org</u>

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please contact the Probation Division at (609)465-1090

Thank you for your immediate attention to this matter.

JEROME MANSFIELD	
PROBATION OFFICER	





Probation Division, Child Support Enforcement 60 W BROAD STREET BRIDGETON, NJ 08302-0438 Website: www.njchildsupport.org



(856)453-4600 Fax: (856)453-1824

To: ANDREANA KAVADAS
ATTN: CHAD ANDREWS
203 W MCNEAL ST
APT 3
MILLVILLE, NJ 08332-3738

Date: 08/27/2012 Case ID: C\$50434431B Docket Number: FD-18-000123-08

#### NOTICE OF INTENT OF BENCH WARRANT

Dear ANDREANA KAVADAS.

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact the undersigned at (856)453-4612, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.

Sincerely,

**WARREN JOHNSON** 

Probation Child Support Enforcement Worker

CS594.20757226

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Probation Division, Child Support Enforcement

4 MOORE RD

CAPE MAY COURT HOUSE, NJ 08210-1645

Website: www.njchildsupport.org



(877)655-4371 Fax: (609)463-5191

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 05/05/2014

# PIETRANGELO DANIEL J Plaintiff X Obligee Obligor vs. KAVADAS ANDREANA Defendant Obligee X Obligor

NOTICE OF DELINQUENCY

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS,

On 04/30/2014 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTY Probation Division in the sum of \$50.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$683.00, on 07/23/2012

Your account is in arrears of \$ 6,147.68 as of 05/05/2014

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371 or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371

Thank you for your immediate attention to this matter

JEROME MANSFIELD
PROBATION OFFICER



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Probation Division, Child Support Enforcement 60 W BROAD ST BRIDGETON,NJ08302-2515 Website: www.njchildsupport.org

(877)655-4371 Fax:(856)453-1824

To: ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON,NJ08302-2514 Date:05/21/2014

Case ID:CS50434431B

Docket Number:FD-18-000123-08

#### NOTICE OF INTENT OF BENCH WARRANT

Dear ANDREANA KAVADAS.

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.



Probation Division, Child Support Enforcement 60 W BROAD ST BRIDGETON, NJ 08302-2515 Website: www.njchildsupport.org



(877)655-4371 Fax: (856)453-1824

Docket No: FD-18-000123-08

-Case ID: CS50434431B

Date: 06/17/2014

### PIETRANGELO DAVID

Plaintiff X Obligee Obligor

VS.

**KAVADAS ANDREANA** 

Defendant Obligee X Obligor

#### **NOTICE OF DELINQUENCY**

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS.

On 12/23/2008 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CUMBERLAND COUNTY Probation Division in the sum of \$64.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$ 10.00, on 06/10/2014

Your account is in arrears of \$ 11,134.00 as of 06/17/2014

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371 or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371

Thank you for your immediate attention to this matter.

LAWRENCE KANTROWITZ

BILINGUAL PROBATION OFFICER



Probation Division, Child Support Enforcement 60 W BROAD ST BRIDGETON,NJ08302-2515 Website: www.njchildsupport.org



To: ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON,NJ08302-2514

Date:07/02/2014
Case ID:CS50434431B
Docket Number:FD-18-000123-08

#### NOTICE OF INTENT OF BENCH WARRANT

Dear ANDREANA KAVADAS.

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.



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Probation Division, Child Support Enforcement
4 MOORE RD
CAPE MAY COURT HOUSE, NJ 08210-1645
Website: www.njchildsupport.org



(877)655-4371 Fax: (609)463-5191

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 07/15/2014

# PIETRANGELO DANIEL J Plaintiff X Obligee Obligor vs. KAVADAS ANDREANA Defendant Obligee X Obligor

#### **NOTICE OF DELINQUENCY**

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS,

On 04/30/2014 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTY Probation Division in the sum of \$50.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$ 10.00, on 06/18/2014

Your account is in arrears of \$ 6,067.68 as of 07/15/2014

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371 or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371

Thank you for your immediate attention to this matter

JEROME MANSFIELD	
PROBATION OFFICER	





Probation Division, Child Support Enforcement 4 MOORE RD CAPE MAY COURT HOUSE,NJ08210-1645 Website: www.njchildsupport.org



To: ANDREANA KAVADAS
45 W BROAD ST
APT B
BRIDGETON,NJ08302-2514

Date:08/01/2014
Case ID:CS50908824A
Docket Number:FD-05-000080-05

#### NOTICE OF INTENT OF BENCH WARRANT

Dear ANDREANA KAVADAS,

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.





Probation Division, Child Support Enforcement 60 W BROAD ST BRIDGETON, NJ 08302-2515

Website: www.njchildsupport.org



(877)655-4371 Fax: (856)453-1824

Docket No: FD-18-000123-08
Case ID: CS50434431B

Date: 09/29/2014

# PIETRANGELO DAVID Plaintiff XObligee Obliger vs. KAVADAS ANDREANA

Defendant Obligee X Obligor

NOTICE OF DELINQUENCY

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS.

On 12/23/2008an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CUMBERLAND COUNTYProbation Division in the sum of \$64.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$ 10.00, on 06/18/2014.

Your current balance owed is \$ 11,724.00as of 09/29/2014.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

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Thank you for your immediate attention to this matter

LAWRENCE	KANTROWIT	rz -	
BILINGUAL F	ROBATION	OFFICER	





Probation Division, Child Support Enforcement 60 W BROAD ST BRIDGETON, NJ 08302-2515

Website: www.njchildsupport.org



(877)655-4371 Fax: (856)453-1824

Docket No: FD-18-000123-08

Case ID: CS50434431B

Date: 12/08/2014

# Plaintiff X Obligee C

Obligor

**KAVADAS ANDREANA** 

Defendant Obligee X Obligor

**NOTICE OF DELINQUENCY** 

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS.

On 12/23/2008an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CUMBERLAND COUNTYProbation Division in the sum of \$64.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was \$ 10.00, on 06/18/2014.

Your current balance owed is \$ 12,124.00as of 12/08/2014.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371

Thank you for your immediate attention to this matter

LAWRENCE KANTROWITZ
BILINGUAL PROBATION OFFICER

C3)



Probation Division, Child Support Enforcement
4 MOORE RD
CAPE MAY COURT HOUSE, NJ 08210-1645
Website: www.njchildsupport.org

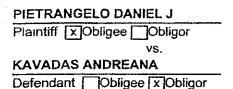


(877)655-4371 Fax: (609)463-5191

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 12/15/2014



NOTICE OF DELINQUENCY

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS,

On 04/30/2014an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTYProbation Division in the sum of \$50.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$ 10.00, on 06/18/2014.

Your current balance owed is \$ 6,067.68as of 12/15/2014.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter.

JEROME MANSFIELD
PROBATION OFFICER





Probation Division, Child Support Enforcement 60 W BROAD ST BRIDGETON,NJ08302-2515 Website: www.njchildsupport.org



To: ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON,NJ08302-2514

Date:12/23/2014 Case ID:CS50434431B Docket Number:FD-18-000123-08

#### NOTICE OF INTENT OF BENCH WARRANT

Dear ANDREANA KAVADAS,

An order was previously entered placing you on strict probation status, whereby if you fall to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.



Probation Division, Child Support Enforcement 4 MOORE RD CAPE MAY COURT HOUSE,NJ08210-1645 Website: www.nichildsupport.org



To: ANDREANA KAVADAS
45 W BROAD ST
APT B
BRIDGETON,NJ08302-2514

Date:01/15/2015 Case ID:CS50908824A Docket Number:FD-05-000080-05

#### NOTICE OF INTENT OF BENCH WARRANT

Dear ANDREANA KAVADAS.

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.





Probation Division, Child Support Enforcement 4 MOORE RD CAPE MAY COURT HOUSE, NJ 08210-1645

Website: www.njchildsupport.org



(877)655-4371 Fax: (609)463-5191

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 02/10/2015

# Plaintiff X Obligee Obligor

V.

KAVADAS ANDREANA

Defendant Obligee X Obligor

#### NOTICE OF DELINQUENCY

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS,

On 04/30/2014an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTYProbation Division in the sum of \$ 50.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$ 10.00, on 06/18/2014.

Your current balance owed is \$ 6,067.68as of 02/10/2015.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter

JEROME MANSFIELD
PROBATION OFFICER

do



Probation Division, Child Support Enforcement 60 W BROAD ST BRIDGETON,NJ08302-2515 Website: www.njchildsupport.org



(877)655-4371 Fax:(856)453-1824

To: ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON,NJ08302-2514 Date:04/09/2015 Case ID:CS50434431B Docket Number:FD-18-000123-08

## NOTICE OF INTENT OF BENCH WARRANT

Dear ANDREANA KAVADAS,

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.





Probation Division, Child Support Enforcement
4 MOORE RD
CAPE MAY COURT HOUSE, NJ 08210-1645
Website: www.njchildsupport.org



(877)655-4371 Fax: (609)463-5191

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 05/05/2015

# PlETRANGELO DANIEL J Plaintiff X Obligee Obligor

VS.

**KAVADAS ANDREANA** 

Defendant Obligee XObligor

**NOTICE OF DELINQUENCY** 

ANDREANA KAVADAS 45 W BROAD ST APT B BRIDGETON, NJ 08302-2514

Dear ANDREANA KAVADAS,

On 04/30/2014an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the CAPE MAY COUNTYProbation Division in the sum of \$ 50.00 WEEKLY According to our records, we have not received payments from you in accordance with the court order Specifically, the last regular payment posted to your account was \$ 150.00, on 03/20/2015.

Your current balance owed is \$ 5,917.68as of 05/05/2015.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter

JEROME MANSFIELD
PROBATION OFFICER







STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION 225 EAST STATE STREET TRENTON, NEW JERSEY 08666 (809)292-7500

# HE CONTRAVATION CORESTON DE LA CONTRAVA DEL CONTRAVA DEL CONTRAVA DE LA CONTRAVA DEL CONTRAVA DE LA CONTRAVA DEL CONTRAVA DE LA CONTRAVA DEL CONTRAVA DE LA CONTRAVA DEL CONTRAVA DE LA CO

ANDREANA KAVADAS D.L. NUMBER 45 U. BROAD ST. 8 NJ 08302-2514 BRIDGETON

K0203 04500 F5344

Your New Jersey driving privilege is suspended as of 02/10/2015 indefinitely.

This suspension is in addition to other

suspensions outstanding effective 08/09/2008. Motor Vehicle Commission confirms that, pursuant to statutory law N.J.S.A. 2a:17-56.41, your New Jersey driving pristlegs was suspended on the above date when the following superior court issued a child support related

warrant against you: CT NAME: CAPE MAY CO COURT

CITY: CAPE MAY

ST: NJ ZIP: 08210

COURT HOUSE

If you have not surrendered your current New Jersey driver license to the above court, you must surrender it to the Motor Vehicle Commission immediately. You may not operate any motor vehicle until you receive written notice of restoration from the Chief Administrator. It you continue to drive while suspended, you could face up to five years in jail.

(Continued on other side)

WRENT (R 6/10)

Please visit us at www.njmvc.gov Detach And Return This Part

Raymond P. Martinez, Chief Administrator

KAVADAS ANDREANA 45 W. BROAD ST. #B

NJ 08302-2514

E96 O FPCS

Restoration Fee Due:

**BRIDGETON** 

\$100.00

Return this part with your restoration fee check or money order, made payable to N.J. Motor Vehicle Commission, using the enclosed envelope.

VF/K090304200627940000000000000005041EDHFPAIDEDHÓOOA9150430000005

Kavadas et al v Martinez et al

D.L. K0903 D4200 62794

To have your privileges restored at the end of your suspension period, you must pay a \$100.00 restoration fee to the Motor Vehicle Commission. You must also provide the Motor Vehicle Commission with a court order restoring your license or a Probation Division Certification attesting to full satisfaction of child support arrearage. For more information, contact the Probation Division of Superior Court in the county indicated above.

1.

 $\mathcal{P}^{\alpha}$ 

		SUPERIOR COUR	T OF NEW JERSEY		
PIETRANGELO DANIEL J	KAVADAS ANDREANA	Chancery Division-Family Part			
	S DEFENDANT	OR OR	ORDER		
Obligor x Obligee	x Obligor Obligee		COUNTY: CAPE MAY COUNTY		
HEARING DATE 03/18/2015	WELFARE / U.I.F.S.A. #	DOCKET#: FD-05-000080-05			
		CS#: CS50908824A			
With appearance by:			tty for DEF		
□ IV-D Atty	X County Probatio				
	to the court by:  Plaintiff  Defe Division for an ORDER for:  Pa				
Visitation Custody	DIVISION TO All ORDER TO.	termy [			
	on / Increase / Decrease				
	usive Jurisdiction:NEW JERSEY				
CHILD'S NAME	BIRTH DATE	CHILD'S NAME	BIRTH DATE		
2A. PIETRANGELO	11/27/1998	2D.	P31(312 X27-14-1		
PHOENIX					
2b.		2E.			
2C.		2F			
3. PATERNITY of child(	(ren) (# above) is he	eby established and an ORDER of pater	nity is hereby entered.		
· · · · · · · · · · · · · · · · · · ·	ntage has been filed for child(ren)	<u> </u>	·		
5. T IT IS HEREBY ORDE	RED THAT The obligor shall pay	support to the New Jersey Family Support	ort Payment Center in the amount of:		
	1+1 1=1	payable [	effective		
		payable	Cinconyo		
Child Support Spousal Support Arrears Payment Total Frequency Date					
NOTE: Child	support is subject to a biennial	cost-of-living adjustment in accordance	e with R. 5:6B		
6. Child Support Guideli	ines Order Deviati	on reason:			
6A. Worksheet attached.	The second secon		CADE HAY COUNTY COUNTY		
	·	Probation Division in the county of Ven			
8. ARREARS calculated	i at establishment nearing are bas	ed upon amounts and effective date note	d spoke and total		
9. X ARREARS indicated in	in the records of the Probation Div	sion, are \$ 6,067,68as of 03/19/2015			
		by the Child Support Guidelines, upon w	hich thisORDER is based:		
OBLIGEE \$	•	OBLIGOR \$			
11. INCOME WITHHOLD	ING is hereby ORDERED on cum	ent and future income sources, including			
Name of in	come source:	Add	ress of income source:		
OBLIGOR SHALL box	wever make navments AT ANY T	IME that the full amount of support and a	rrears is not withheld.		
12. Medical Support coverage as available at reasonable cost shall be provided for the					
Child(ren) Spouse by Obligor Obligee Both					
The parties shall pay u	·	ses of the child(ren) which exceed \$250.			
Production of the state of the	% Obligor		% Obligee		
Pursuant to R 5:6A the obligee shall be responsible for the first \$250.00 per child per year. If coverage is available, Medical Insurance I.D. card(s) as proof of coverage for the child(ren)/spouse shall be provided immediately					
upon availability to the Probation Division by the:					
		<b>- - - - - - - - - -</b>			
12A. Insurance currently pro	Probation Division by the:	or			





DOC	KET#	FD-05-000080-05	CS# <u>C\$50908824A</u> H	HEARING DATE	03/18/2015	PAGE 2 OF 2
13.		GENETIC TESTING to ass	sist the court in determining pate	ernity of the child(ren)		hereby ORDERED. The county
•		welfare agency or the foreig	ian jurisdiction in the county of n	residence of the child s	shall bear the cost	of said testing, without prejudice
ĺ		to final allocation of said cos	osts. If defendant is later adjudic	cated the father of said	d child(ren), defend	dant shall reimburse the welfare
l			d tests, and pay child support re	etroactive to		
13A.		Issues of reimbursement rei	sserved.	13B. Issue of retro	pactive order reser	ved.
14.		This matter is hereby RELIS	STED for a hearing on	before		s ORDER shall serve as the
İ	t	summons for the hearings. I	No further notice for appearance	ce shall be given. Fail	iure to appear may	result in a default order, bench
l		warrant, or dismissal. Reason	son for relist:			
15.	П	AN EMPLOYMENT SEARC	CH MUST BE CONDUCTED B'	Y THE OBLIGOR, Wr	ritten records of at I	least #employment contacts
	<u> </u>	per week must be presente	ed to the Probation Division. If e	imployed, proof of incr	ome and the full na	ime and address of employer
			lely to the Probation Division.		·	- :
16.		SERVICE upon which this o	order is based:	<b>A</b> *		
		Personal Service Ce	ertified Mail:	Refused	Rec	gular Mail (not returned)
ĺ			igned by:	Returned Unclai		
17			he arrest of the obligor is hereby		4	served with notice for court
	<u> </u>	appearance on	ne arrest of the obligor is hereby , and failed to appear. (Service i	noted shove). An am	inunt of \$	shall be required for release.
40			UTURE MISSED PAYMENT(S)			
18.	L			/ numbering	OF MOIS MAY	result in the issuance of a
		warrant, without further notice		**************************************	he	· · · · · · · · · · · · · · · · · · ·
19.	Parameter P	A LUMP SUM PAYMENT OF	√FCmust be mar	de by the obligor my _	, Of a Der	ench warrant may be issued
		without further notice.				
20.		This complaint / motion is he	ereby DISMISSED: (reason)			
21.			TERMINATED effective			Arrears accrued prior to effective
			the rate and frequency noted o			
22.		THIS ORDER IS ENTERED	BY DEFAULT The bligor	Cobligee was prope	ariy served to appe	ar for a hearing on
	#********	and failed to app		Non-Military Service		
23.	X					oligor's release. Driver's license
44.	ىك	rounted as a result of a Ch	hild Support Bench Warrant	to he reinstated u	non payment of th	ne required restoration fee.
	<del></del>		DED HEREIN, ALL PRIOR ORDERS O			
			rstand all provisions of this ORE			
		inereby declare that i unders		JEK recommended of	y a nearing cinoci	Sile i waire my ngar so on.
PLAINT		mineurale appear to a cupo.		DEFENDANT		
*	* 1 1 1	FOR PLAINTIFF		DEFERDANT TORNEY FOR DEFE	SMITANT	
24. T		INTAKE CONFERENCE BY AUTH		PURSEAL LACE STREET, III	Spiritaire e	
25. I			nnation of all Title IV-D services	e and consent to direc	d navment of supp	ort. They are advised that all
i		monitorna collection, enforc	rement and location services a	vailable under Title IV	/-D of the Social Sr	ecurity Act are no longer in effect.
		I understand I may reapply fo		Pathaman Commercial Co	State and a	
		. Lie the Lie and Lie	A state of mounts.			
	-	obligee				obligor
26.	<del></del>	Copies provided at hearing to	- L'Abliges L'Abligor 264	X Copies to be maile	ed to Exinblinee	
20. L			ERSEY UNIFORM SUPPORT NOTIC			
	1	AKE NOTICE THAT THE NEW JE	ERSEY UNIFORM SUPPORT NOTIC PRATED INTO THIS ORDER BY REFE	ES WHICH ARE PROVID	ING ON ALL PARTIES	S. OF THE RULES OF COURT, 1-10
		So Recommended to the Cou		27 (22)		
		Date	H.C	n. §	Signature	
<del>-</del>					//ginami	
		So Ordered by the Court	furnish is bajul			J.S.C.
		Date 03/19/2015	Judge JOHN R RAUH	· O.	ار ہے۔ اور جہ	Wide Grant
		7			KA ne	e e e e e e e e e e e e e e e e e e e
			-	Signature		





		7	~ ~ ~ average greenstates		
DIETRANCEI Ó DANIEL ) KAVADAS ANDREANA		SUPERIOR COURT OF NEW JERSEY			
PIETRANGELO DANIEL J KAVADAS ANDREANA   PLAINTIFF		Chancery Division-Family Part			
1		ORDER CORDER			
Obligor X Obliges	X Obligor Obligee	COUNTY: CAPE MAY COUNTY			
HEARING DATE	WELFARE/U.I.F.S.A.#	DOCKET#: FD-05-000080-05			
04/30/2014	<u> </u>	CS#: CS50908824A			
With appearance by:			tty for DEF		
□rV-D Atty	X County Probation D	ivision <u>DOUGHERTY</u>			
This matter having been opened to	o the court by: Plaintiff Defende	ant County Welfare Agency			
Probation Division Family D	Division for an ORDER for. Pater	nity Support			
Visitation Custody					
X Enforcement Modification	n / Increase / Decrease				
State with Continuing Exclu	sive Junsdiction:NEW JERSEY				
CHILL'S NAME	BIRTH DATE	CHILD'S NAME	BIRTH DATE		
2A. PIETRANGELO	11/27/1998	20.			
PHOENIX	I IIIEII ISSU	1.20.			
28.		l 2E.			
2C.		2F			
		.1	Street and an anti-		
3. PATERNITY of child(r		established and an ORDER of patern	incy is hereby entered.		
	tage has been filed for child(ren) #	above.	protein ;		
5. IT IS HEREBY ORDE	RED THAT The obligor shall pay su	pport to the New Jersey Family Suppo	ort Payment Center in the amount of:		
+		payable	effective		
		E-C-1	Date		
Child Support Spousal Supp		Total Frequency			
		it-of-living adjustment in accordance	e with R. 5:05		
6. Child Support Guidelin	nes Order Deviation r	reason:			
6A. Worksheet attached.		<u>, ,,, ,,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,,</u>			
		robation Division in the county of Ven-			
	at establishment hearing are based in	upon amounts and effective date note	d above and lotal		
\$					
	n the records of the Probation Division				
10. GROSS WEEKLY INC	COMES of the parties, as defined by	the Child Support Guidelines, upon w OBLIGOR \$	hich thisORDER is based:		
11. NCOME WITHHOLD	NG is hereby ORDERED on current	and future income sources, including			
Name of income source: Address of income source:					
OBLIGOR SHALL, however, make payments AT ANY TIME that the full amount of support and arrears is not withheld.					
12. Medical Support coverage as available at reasonable cost shall be provided for the					
child(ren) sp	ouse, by Obligor Obl	ligee Both State S250	Of nor child nor year as follows:		
The parties shall pay unreimbursable health care expenses of the child(ren) which exceed \$250.00 per child per year as follows:					
% Obligor % Obligee					
Pursuant to R 5;6A the obligee shall be responsible for the first \$250.00 per child per year.  If coverage is available, Medical Insurance I.D. card(s) as proof of coverage for the child(ren)/spouse shall be provided immediately					
	Probation Division by the:	enen me masseralle imi nin niitaleneili ahe			
	oligee Obligor		NAME OF THE OWNER OWNER OF THE OWNER OWNER OF THE OWNER OWNE		
- Indiana	The state of the s				





DOCK	Œ7#	FD-05-000080-05	CS# <u>CS50908824A</u>	HEARING DATE	04/30/2014	PAGE 2 OF 2
13.		welfare agency or the f		of residence of the child si	hall bear the co	is hereby ORDERED. The county ost of said testing, without prejudice andant shall reimburse the welfare
1		and the second s	f said tests, and pay child support	•		A grappit is this chief a state to the person of the same of the s
13A.		Issues of rem.burseme	ant reserved.	13B. Ssue of retros	active order res	erved.
14.		summons for the hearing warrant, or dismissal. R	Reason for relist:		ire to appear ma	this ORDER shall serve as the ay result in a default order, bench
15.		per week must be prese must be provided imme	ARCH MUST BE CONDUCTED sented to the Probation Division. ediately to the Probation Division	. If employed, proof of inco	ten records of a me and the full	at least #employment contacts name and address of employer
16.		SERVICE upon which the				-
		Personal Service Date:	Certified Mail: Signed by:	Refused Returned Unclain	med 🛗 O	legular Mail (not returned) other:
17		appearance on		vice noted above). An amo	unt of \$	shall be required for release.
18.		warrant, without further				· .
19.		without further notice.	NT OF \$must be	· · · · · · · · · · · · · · · · · · ·	, or a i	sench warrant may be issued
20.			is hereby DISMISSED: (reason			
21.			eby TERMINATED effective and at the rate and frequency note		this ORDER.	Arrears accrued prior to effective
22.		THIS ORDER IS ENTER and failed to	RED BY DEFAULT The Cobin of appear. 22A. Affidayit	igor bobligee was proper it of Non-Military Service is		pear for a hearing on
23. [	X	It is further ORDERED: (	Obligor appeared at Cumberta	and County Probation Div	rision for the A	mnesty Week Program. The bench
		warrant dated 9/7/2012	2 had been recalled, Obligor v	was not given any cond	itions for this	release. Restore the Obligor's N.
			stipulation that if two paymen remedy on this account.	its are missed on this av	CCOUNT a Dette	h warrant will issue for the NCP's
<u></u>	بببب		OVIDED HEREIN, ALL PRIOR ORDE	RS OF THE COURT REMAIN!	N FULL FORCE A	ND EFFECT.
······			inderstand all provisions of this (			
	ì	immediate appeal to a S			=	
PLAINT	•	بمرشوريون والماسات المساب		DEFENDANT		
ATTORN 24.		FOR PLAINTIFF Intake conference by A	AUTHORIZED COURT STAFF	ATTORNEY FOR DEFEN	ADWI	
25.		The parties request the to monitoring, collection, en	termination of all Title IV-D servi	ices and consent to direct is available under Title IV-	payment of sur D of the Social	pport. They are advised that all Security Act are no longer in effect.
	٠	oblig	723			obligor
26.	7,		ing to bligee bligor 2	ORA IV Cooles to be maile	d to Ix lobligee	
	i	TAKE NOTICE THAT THE NE	EW JERSEY UNIFORM SUPPORT NO DRPORATED INTO THIS ORDER BY F	OTICES WHICH ARE PROVIDE	D IN APPENDIX X	KVI OF THE RULES OF COURT, AND
			e Court by the Hearing Officer:		<u></u>	
		Date		H.O. Si	gnature	
		So Ordered by the Cour Date 04/30/2014	it: Judge JOHN R RAUH	3	ca m	J.S.C.





#### The Law Office of

David Perry Davis 112 West Franklin Ave Pennington NJ 08534 (609) 737-2222 (609) 737-3222 (fax) Attorney ID: 047451996 Attorney for plaintiff class

Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, Paulo : CHANCERY DIVISION Arede, individually and on behalf of all persons similarly : DOCKET NO. MER-L-1004-15 situated,

Plaintiffs

vs.

Raymond P. Martinez, in his official capacity as Chief Administrator of the New Jersey Motor Vehicle Commission, and The New Jersey Motor Vehicle Commission,

John Jay Hoffman, Esq., in his official capacity as Acting Attorney General of the State of : New Jersey, and The State of New : Jersey,

Natasha Johnson, in her official capacity as Director of the Department of Human Services, Division of Family Development, Office of Child Support Services, and Department of Human Services, Division of Family Development, Office of Child Support Services,

Defendants

: SUPERIOR COURT OF NEW JERSEY

: MERCER COUNTY

Civil Action

CERTIFICATION OF PAULO AREDE IN SUPPORT OF APPLICATION FOR PARTIAL SUMMARY JUDGMENT

Paulo Arede, of full age, being duly sworn, hereby certifies as follows:

- 1. I am a named plaintiff in the above-captioned matter and make this certification in support of the within application. I am personally familiar with all the facts alleged herein.
  - 2. I am a child support obligor on two week warrant status

(Exhibit D-6).

- 3. I have been subject to many (at least 7) license suspensions as a result of my inability to pay child support (Exhibit D-7). I am aware that other people have received warnings from the court entitled "Notice of Delinquency" and "Notice of Intent to Issue Bench Warrant." I have never received these or any other type of warning letter before a suspension was imposed. I have simply received notices in the mail from MVC telling me my license had been suspended several days earlier (see attached), or I have had the police appear at my door and advise me a warrant was issued for child support, which automatically suspended my license.
- 3. Although I am reliant on Social Security Supplemental Security Income (D-4) of \$741.25 per month, I remain on "two week bench warrant" status. While income has been imputed to me, a decision I disagree with, no one has alleged that I actually earn this additional "imputed" income or have additional funds (only that, in theory, I "could" and "should" earn it) (D-5).
- 4. If I received a warning that a suspension was coming and if a hearing was held, I would have and could have shown that it would not have helped me to pay support it would hurt my ability to do so. My primary employment in my life has been as a driver. If I received a notice that my license was going to be suspended on a certain date, I would refrain from driving until I could get to court and address the issue.
- 5. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Paulo Arede

DATED:

2-3-

#### ATTORNEY CERTIFICATION PURSUANT TO R. 1:4-4 (c)

David Perry Davis, of full age, hereby certifies as follows

- 1. I am an attorney at law of the State of New Jersey. I represent the plaintiffs Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, and Paulo Arede in this matter.
- 2. I was not able to personally meet with my client to obtain a signature. However, my client has authorized me to affix their signature and has acknowledged the genuineness of the signature to me.
- 3. I am filing this certification so that the Court may accept the signature as if it were an original. An original signature will be filed if requested by the Court or another party.
- 4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

David Perry Davis, Esq.

DATED: 8/20/15

### ORDER PREPARED BY THE COURT

FILED
JAN 16 2014
MIRTHAOSPINA
JEC

AURORA AREDE,
Plaintiff

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION FAMILY PART
HUDSON COUNTY
CIVIL ACTION

PAULO AREDE, Defendant. DOCKET NO. FM-09-2326-06 CS: 13412440A

#### ORDER

THIS MATTER having been opened to the Court on a Notice of Motion filed by Defendant, pro se, and with opposition having been filed by Plaintiff, represented by Monique D. Morcira, Esq., and the Court having considered the submissions of the parties, and the Court having held a plenary hearing on January 13, 2014, and for the reasons set forth on the record; and for good cause shown;

## IT IS on this 16th day of January, 2014, HEREBY

1. ORDERED, that Defendant's application to terminate or suspend his child support obligation and arrears because he is receiving Supplemental Social Security Income (SSI) is DENIED WITHOUT PREJUDICE. Based on Defendant's restrinony to the Court that he was the sole proprietor and Chief Executive Officer of two (2) truck delivery businesses until 2006; that from the time he was disabled on April 1, 2012 until recently he worked at a mechanic shop driving motor vehicles for clients and cancel Three Bundred Twenty Dollars (\$320.0) per week; that the Defendant presently drives a motor vehicle himself, that Defendant's psychiatrist, Joy Robertson, M.D. and psychotherapist, Ruth Weinberg, LCSW, state in their November 6, 2013 correspondence that for the past flire (3) years the Defendant has been compliant with taking his medication and that he is not a danger to



62-31

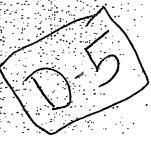
himself or others and does not present any psychotic symptoms; and that the Defendant reads and understands English; the Court finds that Defendant has the ability to earn additional income. Burns v. Edwards, 367 N.J. Super. 29,50 (App. Div. 2004) ("a child support order may be entered against a parent who is an SSI recipient where the Court concludes that the parent is earning or has the ability to earn additional income); see also Crespo v. Crespo, 395.

N.J. Super. 190, 194 (App. Div. 2007) 1; it is further;

- 2. ORDERED, that Defendant shall be imputed income in the amount of Three Hundred Twenty Dollars (\$320.00) per week representing the amount the Defendant earned since April 1, 2012 when he worked at the mechanic shop; if is further;
- 3. ORDERED, that Defendant shall pay One Hundred Fifty Four Dollars and Eighty Cents (\$154.80) per month towards his child support and Twenty Dollars (\$20.00) per month towards his child support arrears, effective December 5, 2013, the date the motion was

Notably, the suspension of child support was not accompanied with any finding of defendant's inability to earn additional income. As made clear in Burns, supra, and as reiterated in Crespo, supra, a parent's receipt of means tested benefits does not in and of itself require suspension or reduction of a child support obligation. The court must find that the parent receives means tested benefits and is unable to earn additional income, such that additional income cannot be imputed to the parent. See Grespo, supra, 395 NJ. Super. at 194-95; Burns, supra, 367 NJ. Super. at 194-95; Burns, supra, 367 NJ. Super. at 50. A total suspension of defendant's obligations without an ability to earn analysis is inappropriate.

(Emphasis on the original) (Emphasis added)



The Supreme Court "underscore de that '[n] o unpublished opinion shall constitute precedent or be binding upon any court and that 'no unpublished opinion shall be sited by any court." In re Alleged Improper Practice 194 N. 314, 330 n. 10, (2008) (citing R. 1.36-3). However, where the unpublished opinion relies on published opinions, the unpublished opinion provides useful guidance. Thus, the Court relies on Bell v. Bell, No. A 4876-1173 (App. Div. July 10, 2013) (slip. op. at 7-8), which states in pertinent part:

filed. Said amount shall be made payable via check or money order to the New Jersey Family Support Payment Center (NJFSPC). Defendant may mail payments to the New Jersey Family Support Payment Center at P.G. Box 4880, Trenton, New Jersey, 08650 or personally deliver payments to the Hudson County Probation Department located at 595 Newark Avenue, Jersey City, New Jersey 07306;

- ORDERED, that Hudson County Probation Department shall not garnish Defendant's SSI check; it is further
- 5. ORDERED, that should Defendant miss two (2) consecutive child support payments, a bench warrant shall be issued for his arrest; it is further
- 6. ORDERED; that a copy of this Order must be served upon all parties within seven (7) days of the date of this Order.

REASONS

X Opposed Unopposed cc: parties

## NOT FOR PUBLICATION OR DISSEMINATION EXCEPT PURSUANT TO COURT RULE

The parties have 45 days from the date of this Order to tile an appeal. The Court reserves the prerogative to amplify its findings of fact and conclusions of law pursuant to the Rules.

Court ordered two (2) missed payment bench warrant status based upon Defendant's history of Defendant had over Fighty Thousand Dollars (\$80,000.00) in child support arrears before Plaintiff and Defendant entered into a Consent Order:

DRIVING HISTORY RECORD OF PAULO

AREDE

D.L.NUHBER: A7293 61900 08612

		I MACO NICOE D.	NUMBEK: A/293 6	TADO 0893:
DATE	EVENT COD	EVENT DESCRIPTION  PERSNL APPEAR UNSCHED-WAYNE 46 COURT-ORDERED SUS: CHILD SUPPORT RESTORATION FEE PAID RESTORATION OF INDICATED PRIVILEGES COURT-ORDERED SUS: CHILD SUPPORT PERSNL APPEAR UNSCHED-RSC MAYNE RESTORATION OF INDICATED PRIVILEGES RESTORATION FEE PAID RESTORATION OF INDICATED PRIVILEGES COURT-ORDERED SUS: CHILD SUPPORT PERSNL APPEAR UNSCHED-RSC MAYNE RESTORATION OF INDICATED PRIVILEGES PERSNL APPEAR UNSCHED-RSC MAYNE RESTORATION OF INDICATED PRIVILEGES PERSNL APPEAR UNSCHED-RSC MAYNE RESTORATION OF INDICATED PRIVILEGES PERSNL APPEAR UNSCHED-RSC MAYNE COURT-ORDERED SUS: CHILD SUPPORT COURT-ORDERED SUS: CHILD	STATUS	POINTS
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12/15/2008	DYK M PANA	PERSAL APPEAR UNSCHED-RSC WAYNE	ACTIVE	
12/15/2008	MC2 L WE21	RESTURATION FEE PAID	ACTIVE	
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01/31/2007	DYK M PANA	PERSOL APPEAR UNSCHED-RSC MAYNE	ACTIVE	
01/31/2007	KEZ L KEZI	RESTORATION FEE PAID	ACTIVE	
01/32/2007	RES R HSTR	RESTORATION OF INDICATED PRIVILEGES	ACTIVE	
11/14/2007	DAK M LAMY	PERSNL APPEAR UNSCHED-RSC HAYNE	ACTIVE	
14/14/2006	896 O FPCS	COURT-ORDERED SUS: CHILD SUPPORT	REO SATS -	
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09/13/2006	EMA N LLOT	HAZMAT FINGERPRINTS QUALIFIED	ACTIVE	
07/30/2006	DAK H ELCO	HAZMAT FINGERPRINT COMPLIANCE	ACTIVE	
09/27/2006	DIMA M HITTH	HAZMAT ADVISORY FINGERPRINT NOTICE	ACTIVE	
06/14/2005	CTC A CULN	CDL NOTIFICATION - MCSIA	ACTIVE	
00/14/2009 01/19/2008	CT2 W POFC	INVOLVED IN ACCIDENT-POLICE REPORT	ACTIVE	
11/27/2005	ATA A 0333	IMPROPER DISPLAY/FICTITIOUS PLATES	ACTIVE	
11/2//2001	DVR M PAHA	PERSNL APPEAR UNSCHED-RSC MAYNE	ACTIVE	
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04/29/1993	G21 V 4123	IMPROPER RIGHT AND LEFT TURNS	ACTIVE	-3
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ONLY 40 MOST RECENT HISTORY RECORDS PRINTED - CONTACT MOTOR VEHICLE IF NEEDED.

## STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION ABSTRACT OF DRIVER HISTORY RECORD

CERTIFIED - COMPLETE

DRIVER LICENSE NUMBER

FIRST NAME

M.I. LASTNAME

A7293 61900 08612

PAULO

**AREDE** 

STREET

512 ISLAND RD

CITY RAMSEY STATE NJ

ZIPCODE 07446-1140

AREDE PAULD

512 ISLAND RD RAMSEY

NJ 07446-1140

CLASS: A

ENDORSEMENTS: M T

RESTRICTIONS: 1

EXPIRATION: 08 31 2017

W	REQ.REF.:		UNIT A T	T NUMBER ABSTRACT DATE TYPE TY 03 02 2015 K						
EVENT DATE MO. DAY YR.	EVENT RESPONSI- BILITY	EVENT	EVENT IDENTI- FIER	EVENT DESCRIPTION	C M V	H Z M	F T L	p A	PTS.	POSTING DATE MINDDYY
08 14 14	RES	₽	RSTR	RESTORATION OF INDICATED PRIVILEGE						081414
08 14 14	RES	F	LWCC	LICENSE REST FEE PAYMT- WEB/CREDIT						081414
04 21 14	J96	٥	FPCS	COURT-ORDERED SUS: CHILD SUPPORT						042214
68 30 13	RES	R	RSTR	RESTORATION OF INDICATED PRIVILEGE						083013
12 09 10	B96	0	FPCS	COURT-ORDERED SUS CHILD SUPPORT			!			121016
08 04 10	J96	Đ	FPCS ·	COURT-ORDERED SUS. CHILD SUPPORT						080510
07 13 10	J96	0	FPCS	COURT-ORDERED SUS. CHILD SUPPORT						071410
07 13 10	RES	F	REST	RESTORATION FEE PAID						071 <b>310</b>
06 28 10	J96	o	FPCS	COURT-ORDERED SUS CHILD SUPPORT						062910
11 23 D9	RES	R	RSTR	RESTORATION OF INDICATED PRIVILEGE						112309
11 23 09	RES	F	REST	RESTORATION FEE PAID						112309
10 20 09	J96	0	FPCS	COURT-ORDERED SUS. CHILD SUPPORT						102109
09 22 09	CIS	A	POLC	INVOLVED IN ACCIDENT-POLICE REPORT						110309
02 05 09	RES	R	RSTR	RESTORATION OF INDICATED PRIVILEGE						020509
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I CERTIFY THAT ACCORDING TO THE RECORDS OF THE MOTOR VEHICLE COMMISSION, THIS LISTING IS A TRUE ABSTRACT OF THE DRIVER HISTORY RECORD OF THE INDIVIDUAL WHOSE DRIVER LICENSE NUMBER IS LISTED ASOVE. THE RECORD INCLUDES ACCIDENTS, SUSPENSIONS AND CONVICTIONS FOR MOVING VIOLATIONS, AS OF THE ABOVE ABSTRACT DATE.

Kavadas et al v.

#### STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION ABSTRACT OF DRIVER HISTORY RECORD

CERTIFIED - COMPLETE

DRIVER LICENSE NUMBER

FIRST NAME

M.J. LAST NAME

A7293 61900 08612

PAULO

AREDE

STREET 512 ISLAND RD

CITY RAMSEY STATE NJ

9106975270

07446-1140

ZIPCODE

PAULO AREDE 512 ISLAND RD

RAMSEY

NJ 07446-1140

CLASS: A

ENDORSEMENTS: M T

RESTRICTIONS: 1

EXPIRATION: 08 31 2017

REQ. REF. NO. WWW2015060

UNIT NUMBER

ABSTRACT DATE 03 02 2015

TYPE K

EVENT DATE MO. DAY YR.	EVENT RESPONSI- BILITY	EVENT TYPE	EVENT IDENTI- FIER	EVENT DESCRIPTION	C M V	H Z M	FTL	P A	PTS.	POSTING DATE MMDDYY
j				CONTINUED			}			
01 02 09	BÝó	ΰ	FPCS	COURT-ORDERED SUS: CHILD SUPPORT						011209
12 15 08	RES	R	RSTR	RESTORATION OF INDICATED PRIVILEGE						121508
12 15 08	RES	F	REST	RESTORATION FEE PAID						121508
03 20 08	J96	0	FPCS	COURT-ORDERED SUSSECHILD SUPPORT					l	032408
01 31 07	RES	R	RSTR	RESTORATION OF INDICATED PRIVILEGE						013107
01 31 07	RES	F	REST	RESTORATION PEE PAID						013107
12 14 06	B96	0	FPCS	COURT-ORDERED SUS: CHILD SUPPORT						121806
09 25 06	J96	0	FPCS	COURT-ORDERED SUS CHILD SUPPORT						092706
06 14 05	CIS	A	POLC	INVOLVED IN ACCIDENT-ROLICE REPORT						101705
01 19 85	Y17	V	0333	IMPROPER DISPLAY/FICTITIONS PLATES	x					031605
04 29 94	DMV	z	PC03	POINT CREDIT-ANNUAL SAFE DRIVING					-3	043094
04 29 93	G21	V	4123	IMPROPER RIGHT AND LEFT TURNS					3	052893
03 19 91	DMV	Z	PC03 1	POINT CREDIT-ANNUAL SAFE DRIVING					-3	031991
08 28 90	CIS	A	orc 1	INVOLVED IN ACCIDENT-POLICE REPORT						121090
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			<b>, İ</b>				-			

I CERTIFY THAT ACCORDING TO THE RECORDS OF THE MOTOR VEHICLE COMMISSION. THIS LISTING IS A TRUE ABSTRACT OF THE DRIVER HISTORY RECORD OF THE INDIVIDUAL WHOSE DRIVER LICENSE NUMBER IS LISTED ABOVE. THE RECORD INCLUDES ACCIDENTS, SUSPENSIONS AND CONVICTIONS FOR MOVING VIOLATIONS, AS OF THE ABOVE

Kavadas et al v

Raymond P. Martinez, Chief Administrator

# STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION ABSTRACT OF DRIVER HISTORY RECORD

CERTIFIED - COMPLETE

DRIVER LICENSE NUMBER

FIRST NAME

LAST NAME

A7293 61900 08612

PAULO

AREDE

STREET 512 ISLAND RD

CITY RAMSEY STATE NJ

ZIPCODE 07446-1140

PAULO AREDE 512 ISLAND RD RAMSEY NJ

NJ 07446-1140

CLASS: A

ENDORSEMENTS: M T

RESTRICTIONS: 1 EXPIRATION: 08 31 2017

w	REQ.REF. WW2015	NO, 0 6 0	UNIT A T	T NUMBER ABSTRACT DATE TYPE TY 03 02 2015 K						
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02 07 89	CIS	А	POLC	INVOLVED IN ACCIDENT-POLICE REPORT						122989
01 17 89	K84	v	8488	IMPROPER OPER-HWYS WZMARKED LANES					2	061489
01 27 87	cīs	A	POLC	INVOLVED IN ACCIDENT-POLICE REPORT						082687
				CURRENT STATUS - IN GOOD STANDING  ****** HISTORY OF SUSPENSIONS ******  SUSPENSIONS SUSPENDED RETWEEN:  BASIC DRIVING 2006-09-25 2007-01-31  BASIC DRIVING 2008-03-20 2008-12-15  BASIC DRIVING 2009-01-02 2009-02-05  BASIC DRIVING 2009-10-20 2009-11-23  BASIC DRIVING 2010-06-28 2013-08-30  BASIC DRIVING 2014-04-21 2014-08-14						

I CERTIFY THAT ACCORDING TO THE RECORDS OF THE MOTOR VEHICLE COMMISSION, THIS LISTING IS A TRUE ABSTRACT OF THE DRIVER HISTORY RECORD OF THE INDIVIDUAL WHOSE DRIVER LIGENSE NUMBER IS LISTED ABOVE. THE RECORD INCLUDES ACCIDENTS, SUSPENSIONS AND CONVICTIONS FOR MOVING VIOLATIONS, AS OF THE ABOVE ABSTRACT DATE.

D10NW (Rev. 05/10)

Raymand P. Martinez, Chief Administrator

 COMMERCIAL 2010-06-28 2013-08-30
COMMERCIAL 2014-04-21 2014-08-14
* OUT OF STATE DRIVER HISTORY ***
Kavadas et al v. Martinez et al D-1

p.7

646200

DATE PREPARED

07/14/10

J9L O FPCS 00051 Motor Vehicle Commission

STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION 225 EAST STATE STREET TRENTON, NEW JERSEY 08656 (609)292-7500

## CONFIRMATION OF SUSPENSION BY COURT

AREDE PAULO 512 ISLAND RD

D.L. NUMBER

47293 61900 D8612

RAMSEY

NJ 07446-1140

Your New Jersey driving privilege is suspended as of 07/13/2010 indefinitely.

Motor Vehicle Commission confirms that, pursuant to statutory law N.J.S.A. 2a:17-56.41, your New Jersey driving privilege was suspended on the above date when the following superior court issued a child support-related

warrant against you: CT NAME: HUDSON COUNTY COURT

CITY: JERSEY CITY

ZIP: 07306 ST: NJ

ADMIN BLDG

595 NEWARK AVE

If you have not surrendered your current New Jersey driver license to the above court, you must surrender it to the Motor Vehicle Commission immediately. You may not operate any motor vehicle until you receive written notice of restoration from the Chief Administrator. If you continue to drive while suspended, you could face up to five years in jail.

(Continued on other side)

WREMT (R SI10)

Please visit us at www.njmvc.gov Detach And Return This Part

Raymund P. Martinez, Chief Administrator

PAULO

AREDE

D.L. A7293 61900 08612

512 ISLAND RD

RAMSEY

NJ 07446-1140

**J96 O FPCS** 

Restoration Fee Due:

\$100.00

Return this part with your restoration fee check or money order, made payable to N.J. Motor Vehicle Commission, using the enclosed envelope.

Kavadas et al v. Martinez et al

JGL O FPCS

00051 003284 DATE PREPARED

06/38/10



STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION 225 EAST STATE STREET TRENTON, NEW JERSEY 08666 (609)292-7500

## CONFIRMATION OF SUSPENSION BY COURT

PAULO AREDE 512 ISLAND RD RAMSEY

D-L- NUMBER

**A7293 61900 08612** 

NJ 07446-1140 

Your New Jersey driving privilege is suspended as of 06/28/2010 indefinitely.

Motor Vehicle Commission confirms that, pursuant to statutory law N.J.S.A. 2a:17-56.41, your New Jersey driving privilege was suspended on the above date when the following superior court issued a child support-related warrant against you: .

CT NAME: HUDSON COUNTY COURT

CITY: JERSEY CITY

ST: NJ ZIP: 07306

ADMIN BLDG

595 NEWARK AVE

If you have not surrendered your current New Jersey driver license to the above court, you must surrender it to the Motor Vehicle Commission immediately. You may not operate any motor vehicle until you receive written notice of restoration from the Chief Administrator. If you continue to drive while suspended, you could face up to five years in jail.

(Continued on other side)

WREMT (R 5/10)

Please visit us at www.njmvc.gov Detach And Return This Part

Raymond P. Martinez, Chief Administrator

PAULO

AREDE

D.L. A7293 61900 08612

512 ISLAND RD RAMSEY

NJ 07446-1140

J96 O FPCS

Restoration Fee Due:

\$100.00

Return this part with your restoration fee check or money order, made payable to N.J. Motor Vehicle Commission, using the enclosed envelope.

DATE PREPARED

08/05/10

J96 0 FPCS

00051 002924 Motor Vehicle Commission

STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION 225 EAST STATE STREET TRENTON, NEW JERSEY 08666 (609)292-7500

## CONFIRMATION OF SUSPENSION BY COURT

PAULO AREDE 512 ISLAND RD

D.L. NUMBER

**A7293 61900 08612** 

RAMSEY

NJ 07446-1140

!!!aaa!eaafefaaf,!aab!!aaaa.!!aa;![a&a#faaaaaa#faaf,![[aa.]

Your New Jersey driving privilege is suspended as of 08/04/2010 indefinitely.

This suspension is in addition to other

suspensions outstanding effective 07/13/2010.

Motor Vehicle Commission confirms that, pursuant to statutory law N.J.S.A. 2a:17-56.41, your New Jersey driving privilege was suspended on the above date when the following superior court issued a child support-related warrant against you:

CT NAME: HUDSON COUNTY COURT

CITY: JERSEY CITY

ST: NJ ZIP: 07306

ADMIN BLDG

595 NEWARK AVE

If you have not surrendered your current New Jersey driver license to the above court, you must surrender it to the Motor Vehicle Commission immediately. You may not operate any motor vehicle until you receive written notice of restoration from the Chief Administrator. If you continue to drive while suspended, you could face up to five years in jail.

(Continued on other side)

WREMT (R 5/10)

Please visit us at www.nimvc.gov Detach And Return This Part

Raymond P. Martinez, Chief Administrator

PAULO

AREDE

D.L. A7293 61900 08612

RAMSEY

512 ISLAND RD

NJ 07446-1140

J96 O FPCS

Restoration Fee Due:

\$100.00

Return this part with your restoration fee check or money order, made payable to N.J. Motor Vehicle Commission, using the enclosed envelope.

Kavadas et al v. Martinez et al

00051 008592

DATE PREPARED

15/15/10



## **Motor Vehicle** Commission

STATE OF NEW JERSEY MOTOR VEHICLE COMMISSION 225 EAST STATE STREET TRENTON, NEW JERSEY 08666 (609)292-7500

## CONFIRMATION OF SUSPENSION BY COURT

PAULO AREDE 512 ISLAND RD

D.L. NUMBER

RAMSEY

NJ 07446-1140

][[...],,.[.],.[.],.[.],.[.],.[.],...[.],...[.],...[.],...[.],...[.],...[.],...[.]

Your New Jersey driving privilege is suspended as of 12/09/2010 indefinitely. This suspension is in addition to other

suspensions outstanding effective 07/13/2010.

Motor Vehicle Commission confirms that, pursuant to statutory law N.J.S.A. 2a:17-56.41, your New Jersey driving privilege was suspended on the above date when the following superior court issued a child support-related warrant against you:

CT NAME: BERGEN COUNTY CT

CITY: HACKENSACK

ST: NJ ZIP: 07601

COURT HOUSE

If you have not surrendered your current New Jersey driver license to the above court, you must surrender it to the Motor Vehicle Commission immediately. You may not operate any motor vehicle until you receive written notice of restoration from the Chief Administrator. If you continue to drive while suspended, you could face up to five years in jail.

(Continued on other side)

WREMT (R 5/10)

Please visit us at www.njmvc.gov Detach And Return This Part

Raymand P. Martinez, Chief Administrator

PAULO

AREDE

D.L. A7293 61900 08612

512 ISLAND RD

RAMSEY

NJ 07446-1140

**B96 O FPCS** 

Restoration Fee Due: \$100.00

Return this part with your restoration fee check or money order, made payable to N.J. Motor Vehicle Commission, using the enclosed envelope.

Kavadas et al v. Martinez et al

#### The Law Office of

David Perry Davis 112 West Franklin Ave Pennington NJ 08534 (609) 737-2222 (609) 737-3222 (fax) Attorney ID: 047451996 Attorney for plaintiff class

Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, Paulo : CHANCERY DIVISION Arede, individually and on behalf of all persons similarly : DOCKET NO. MER-L-1004-15 situated,

Plaintiffs

vs.

Raymond P. Martinez, in his official capacity as Chief Administrator of the New Jersey Motor Vehicle Commission, and The New Jersey Motor Vehicle Commission,

John Jay Hoffman, Esq., in his official capacity as Acting Attorney General of the State of : New Jersey, and The State of New : Jersey,

Natasha Johnson, in her official capacity as Director of the Department of Human Services, Division of Family Development, Office of Child Support Services, and Department of Human Services, Division of Family Development, Office of Child Support Services,

Defendants

: SUPERIOR COURT OF NEW JERSEY : MERCER COUNTY

Civil Action

CERTIFICATION OF : ALISHA GRABOWSKI IN SUPPORT OF APPLICATION FOR PARTIAL SUMMARY JUDGMENT

Alisha Grabowski, of full age, being duly sworn, hereby certifies as follows:

1. I am a named plaintiff in the above-captioned matter and make this certification in support of the within application. I am personally familiar with all the facts alleged herein.



- 2. I am in arrears on my child support obligation and do not have the ability to comply. I am on "two week warrant status." My total arrears are more than the amount due for two weeks and I am thus subject to a warrant at any time and without notice.

  Relatives have helped make payments on my account, but neither they nor I have the ability to stay current and pay my arrears.
- 3. I live in a rural area and all that suspending my license would do is to make it impossible for me to seek employment, pay support, go to school to try to increase my earning capacity, or to come to court if a hearing is scheduled, and to be able to (for example) drive to take the small children in my custody to the doctor's office.
- 4. If I received a notice that my license was going to be suspended on a certain date (or that a suspension would not be effective until a certain date), I would refrain from driving until I could get to court and address the issue.
- 5. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

DATED: 245

Alisha Grabowski

## ATTORNEY CERTIFICATION PURSUANT TO R. 1:4-4 (c)

David Perry Davis, of full age, hereby certifies as follows

- 1. I am an attorney at law of the State of New Jersey. I represent the plaintiffs Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, and Paulo Arede in this matter.
- 2. I was not able to personally meet with my client to obtain a signature. However, my client has authorized me to affix their signature and has acknowledged the genuineness of the signature to me.
- 3. I am filing this certification so that the Court may accept the signature as if it were an original. An original signature will be filed if requested by the Court or another party.
- 4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

David Perry Davis, Esq.

DATED: 8/20/20,5

PLAINTIFF	VS	DEFENDANT	SUPERIOR COUR	TOP NEW JER sion-Family Part	SEY
Sage		Alisha		DER	
Wagner		Wagner	Marcon	The state of the s	
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HEARING DATE	WELFARE!	U.L.F.S.A. #	DOCKET# <u>FM-11 - 12</u> 68# 42/10972-199		
With appearance by PLX	1444.4	coo India	DEF Atty for DEF	Ilman	
UV-D Atty	Ady for PL	1.24	Vicounty Probation Division		
This matter having been opened	to the court by:	☐Plaintiff ☐Def	endant County Welfare Agency	obation Division	☐Family Div
for an ORDER for. Paternity			Custody Denforcement M	odification / incre	ase / Decreas
State with Continuing Exclu	isive Jurisdiction	<b>n.</b>		Escribir a de Total W	
CHILD'S NAME		BIRTH DATE	CHILD'S NAME	W. J. Jan.	BIRTHO
24. Sabrina		10/12/96	(20)		
28. 4		1/30/98	<b>2</b> E.		
garret 20.		1// 201 10	<b>2</b> F.		7
	erin Victoria	1			
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Wagner v. Wagna



DOCKET# [M-11-180	2-04 cs# 42109 73	EALT LEAVING TO THE	99-08 PAGE 2 OF 2
agency or the foreign ju of said costs. If defend tests, and pay child sur	irisdiction in the county of residence of ant is later adjudicated the father of st pport retroactive to	lty of the child(ren) (#) is hereby 0 if the child shall bear the cost of said testi eld child(ren), defendant shall reimburse to the child(ren).	he welfare agency for the costs of said
I3A. Issues of reimbursemen			A copy of this
ORDER shall serve as t	rrant, or dismissal. Reason for relist.	before rther notice for appearance shall be gi	ven. Failure to appear may result in a
5. AN EMPLOYMENT SE per week must be prese provided immediately to	ented to the Probation Division. If emp	THE OBLIGOR. Written records of at lea ployed, proof of income and the full name	st#employment contacts and address of employer must be
6. SERVICE upon which th	is order is based:		
Personal Service	Certified Mail:	Refused	Regular Mail (not returned)
Date:	Signed by:	Returned Unclaimed	☐Other:
. A BENCH WARRANT for	or the arrest of the obligor is hereby C	ORDERED. The obligor was properly ser	ie reduited for release.
EFFECTIVE 2 29 1	Bruture missed payment(s) n	umbering 2— or more may result i	
turiner notice. E GSL23	TOF \$2500 myst be made by 5000 by 3 3 08 c s hereby <b>DISMIS</b> SED: (reason)	the obligor by 2/29/08, or all or warrand to ussue	ench warrant may be issued wilnout
. — ты сопрын чарыоты 35			
Grder of Support is hereb	v TERMINATED effective	as .	
Arrears accrued prior to e	effective date, if any, shall be paid at t	the rate and frequency noted on page nu	mber one of this ORDER:
THIS ADDED IS ENTED	CO OVERTON T. TV. F. T. C.		
. 🔲 THIS ORDER IS ENTERI	ED BY DEFAULT. THE LIOURIES L	Jobligee was properly served to appear	for a hearing on
and failed to appear.	22A. Affidavit of Non-Military	Jobligee was properly served to appear service is filed.	for a hearing on
and failed to appear.  It is further ORDERED:  Pennsylve	22A. □ Affidavitof Non-Millein Proposition to C >nio_1£ necess	Jobligee was properly served to appear y Service is filed.  SOUSHET CASE + h SATH	TOUGH UNESA
and failed to appear.  It is further ORDERED:  PENNSY IVE	22A. □ Affidavit of Non-Military  Probation to r  No. 14 necess  ROVIDED HEREIN, ALL PRIOR OF	Jobligee was properly served to appear y Service is filed.  ROUSE TO COSE THE RDERS OF THE COURT REMAIN IN FU	tor a hearing on Unifold
and failed to appear.  It is further ORDERED:  PENNSY Ve  EXCEPT AS P  I hereby declare that I und appeal to a Superior Court	22A. □ Affidavit of Non-Military  Probusion to C  NCLIF Necess  ROVIDED HEREIN, ALL PRIOR OF  Gretand all provisions of this ORDER  1 20 doe:	Jobligee was properly served to appear y Service is filed.  SOUSHET CASE + h SATH	tor a hearing on
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ind failed to appear.  It is further ORDERED:  PLANSING  EXCEPT AS P  I hereby declare that I und appeal to Superior Court INTIFF  INTAKE CONFERENCE B  The parties request the terr	22A. Affidavit of Non-Military  Probation to Communication to Communication to Communication to Communication of all Title IV-D services and discation services available under T	Jobligee was properly served to appear y Service is filed.  ROSSER COSSE HA  ROBERS OF THE COURT REMAIN IN FU  RECOmmended by a Hearing Officer and EFENDANT WELL LIB  TORNEY FOR DEFENDANT	LL FORCE AND EFFECT.  If waive my right to an immediate  They are advised that all monitoring,
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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08650-0068 Website: www.njchildsupport.org



(011)033-41

Fax:

Docket No: FM-11-000182-04

Case ID: CS42109729A

Date: 02/12/2013

WAGNER SAGE D
Plaintiff X Obligee Obligor
vs.
WAGNER ALISHA M

Defendant Obligee X Obligor

NOTICE OF DELINQUENCY

ALISHA M WAGNER 142 HILLCREST AVE MORRISVILLE, PA 19067-1123

Dear ALISHA M WAGNER,

On 03/20/2008 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the MERCER COUNTY Probation Division in the sum of \$ 158.00 WEEKLY. According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was \$ 75.00, on 04/30/2012.

Your account is in arrears of \$21,739.90 as of 02/12/2013.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371 or via the Internet <u>www.njchildsupport.org</u>.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter.

IJEOMA UMORU
CHILD SUPPORT PROGRAM WORKER





	<del></del>	SUPER	NOR COURT	OF NEW JERSEY	252	
WAGNER SAGE D	WAGNER ALISHA M	Cha	ncery Divisio	on-Family Part		
PLAINTIFF , V:			ORD			
Obligor x Obligee	X Obliger Obligee	COUNTY: MERCE	R COUNTY			
HEARING DATE 12/17/2013	WELFARE / U.I.F.S.A. #	DOCKET#: FM-11				
		CS#: CS42109729			-	
With appearance by:	harden in the second se	X D	immed: "	for DEF		
IV-D Atty	X County Probation D			<del> </del>		
	o the court by: Plaintiff Defend Division for an ORDER for: Pate		Agency	V PRO COLOR		
Visitation Custody	Division for all ORDER forPate	mity Support		·		
X Enforcement   Modificatio	n / Increase / Decrease					
	sive Jurisdiction:NEW JERSEY					
CHILD'S NAME	BIRTH DATE	CHILD'S NA	Marie (Sparke Signal) des	BIRTH DATE	. 1823	
2A. WAGNER SABRINA	10/12/1996	2D.	The Continue so	de Bartal - 11 Tradition - 1 a		
2B. WAGNER GARRET A	04/30/1998	2E.			· · · · · ·	
2 <b>C</b> .	7.755, 1000	2F.				
3. PATERNITY of child(	ren) (# ahove) is hereb	y established and an Of	ODER of paternin	is hereby entered	······································	
	tage has been filed for child(ren) #	above.	· · · · · · · · · · · · · · · · · · ·	to thorough	*	
<u> </u>	RED THAT: The obligor shall pay su		Family Signant	Payment Center in the am	ount of	
J. C. T. HONELES ON DE	. The obligor shall pay so	<u> </u>	r army Support		Ount or.	
<b>T</b>	-	payable		effective		
Child Support Spousal Supp	oort Arrears Payment	Total	Frequency	Date		
NOTE: Child s	upport is subject to a biennial co	it-of-living adjustment	in accordance v	vith R. 5:6B		
6. Child Support Guidelin	nes Order Deviation	reason:			-	
6A. Worksheet attached.						
	administered and enforced by the F		سسبب بيسيس بيسان بينيان بينيان بيني		ity.	
8. ARREARS calculated	at establishment hearing are based	upon amounts and effec	tive date noted a	bove and total		
	n the records of the Probation Division	m are \$ 21 316 50ac n	12/17/2013			
	COMES of the parties, as defined by			h thisORDER is based:		
OBLIGEE \$	y	OBLIGOR \$	anico, apon ma			
11. [] INCOME WITHHOLD	NG is hereby ORDERED on current	and future income sour	ces, including:			
Name of in	come source:		Addres	s of income source:		
-	·		<u>.</u>		1	
OBUGOR SHALL box	Hover make navments AT ANY TIM	E that the full amount of	eurord and arre	ars is not withheld	ĺ	
OBLIGOR SHALL, however, make payments AT ANY TIME that the full amount of support and arrears is not withheld.  12. Medical Support coverage as available at reasonable cost shall be provided for the						
Child(ren) Sp		ligee Both				
The parties shall pay u	nreimbursable health care expenses	of the child(ren) which			vs:	
	% Obligor			Obligee	1	
	e obligee shall be responsible for , Medical Insurance I.D. card(s) as p			e shall be provided immer	ilately	
	Probation Division by the:	and or do relage for the	: Grandi Grigiopotto	e erren ze biotinos titilos	,	
☐ OŁ						
12A. Insurance currently pro						
12B. Health insurance benef	its are to be paid directly to the heal	th care provider by the in	nsurer.		- 1	



EA

DOG	CKET	# FM-11-000182-04 CS# <u>CS42109729A</u> HEARING DATE 12/17/2013 PAGE 2 OF 2
13.		GENETIC TESTING to assist the court in determining paternity of the child(ren)(#) is hereby ORDERED. The county welfare agency or the foreign jurisdiction in the county of residence of the child shall bear the cost of said testing, without prejudice to final allocation of said costs. If defendant is later adjudicated the father of said child(ren), defendant shall reimburse the welfare agency for the costs of said tests, and pay child support retroactive to
13A	· [	Issues of reimbursement reserved. 13B. Issue of retroactive order reserved.
14.		This matter is hereby RELISTED for a hearing on before A copy of this ORDER shall serve as the summons for the hearings. No further notice for appearance shall be given. Fallure to appear may result in a default order, bench warrant, or dismissal. Reason for relist:
15.		AN EMPLOYMENT SEARCH MUST BE CONDUCTED BY THE OBLIGOR. Written records of at least #employment contacts per week must be presented to the Probation Division. If employed, proof of income and the full name and address of employer must be provided immediately to the Probation Division.
16.	L	SERVICE upon which this order is based:  Personal Service
17.		A BENCH WARRANT for the arrest of the obligor is hereby ORDERED. The obligor was properly served with notice for court appearance on, and failed to appear. (Service noted above). An amount of \$ shall be required for release.
18.		EFFECTIVEFUTURE MISSED PAYMENT(S) numbering or more may result in the issuance of a warrant, without further notice.
19.		A LUMP SUM PAYMENT OF \$ must be made by the obligor by, or a bench warrant may be issued without further notice.
20.		This complaint / motion is hereby DISMISSED: (reason)
21.		Order of Support is hereby TERMINATED effective, as Arrears accrued prior to effective date, if any, shall be paid at the rate and frequency noted on page number one of this ORDER.
22.	口	THIS ORDER IS ENTERED BY DEFAULT. Thelobligorlobligee was properly served to appear for a hearing on and falled to appear.
23.	ΙχΊ	
20.	ᇈ	It is further ORDERED: PROBATION TO INITIATE INCOME WITHOLDING FROM NJ UIB.
	<del></del>	EXCEPT AS PROVIDED HEREIN, ALL PRIOR ORDERS OF THE COURT REMAIN IN FULL FORCE AND EFFECT.
***		I hereby declare that I understand all provisions of this ORDER recommended by a Hearing Officer and I waive my right to an immediate appeal to a Superior Court Judge:
PLAIN'		anon il
		adalher
		DEFENDANT
		ATTORNEY FOR DEFENDANT
		2
ATTOR	NEY	FOR PLAINTIFF
24.		INTAKE CONFERENCE BY AUTHORIZED COURT STAFF:
25.		The parties request the termination of all Title IV-D services and consent to direct payment of support. They are advised that all monitoring, collection, enforcement and location services available under Title IV-D of the Social Security Act are no longer in effect. I understand I may reapply for Title IV-D services.
		obligee obligor
26.		Copies provided at hearing tolobligeelobligor 26ACopies to be mailed tolobligeelobligor
		TAKE NOTICE THAT THE NEW JERSEY UNIFORM SUPPORT NOTICES WHICH ARE PROVIDED IN APPENDIX XVI OF THE RULES OF COURT, AND WHICH FOLLOW, ARE INCORPORATED INTO THIS ORDER BY REFERENCE AND ARE BINDING ON ALL PARTIES.
		So Recommended to the Court by the Hearing Officer:
		Date 12/17/2013 H.O. MICHAEL BARRY
		MIZE
		Signature
		Sp Ordered by the Court Date 12/31/2013 Judge FLEE FORRESTER J.S.C.

#### **NEW JERSEY UNIFORM SUPPORT NOTICES**

#### TAKE NOTICE that the following provisions are to be considered part of this order and are binding on all parties:

- You must continue to make all payments until the court order is changed by another court order.
- You must file a WRITTEN request to the Family Division In the county in which the order was entered in order for the court to consider a change in the support order. Contact the Family or Probation Division to find out how to do this. It is important that you request a change as soon as possible after your income or the child(ren)'s status changes. In most cases, if you delay making your request, and you are the obligor, you will have to pay the original amount of support until the date of your written request.
- 3. Payments must be made directly to the New Jersey Family Support Payment Center, P.O. Box 4880, Trenton, NJ 08650, unless the court directs otherwise. Payments may be made by money order, check, direct debit from your checking account, or credit card. Gifts, other purchases, or in-kind payments made directly to the obligee or child(ren) will not fulfill the support obligation. Credit for payments made directly to the obligee or child(ren) may not be given without a court order.
- 4. No payment or installment of an order for child support, or those portions of an order that are allocated for child support, shall be retroactively modified by the court except for the period during which the party seeking relief has pending an application for modification as provided in N.J.S.A. 2A:17-56.23a. (R. 5:7-4(e)).
- 5. The amount of child support and/or the addition of a health care coverage provision in Title IV-D cases shall be subject to review at least once every three years, on written request by either party to the Division of Family Development, P.O. Box 716, Trenton, NJ 08625-0716, as appropriate, or upon application to the court. (N.J.S.A. 2A: 17-56.9a; R. 5:7-4(e)).
- 6. In accordance with N.J.S.A. 2A:34-23b, the custodial parent may require the non-custodial parent's health care coverage provider to make payments directly to the health care provider by submitting a copy of the relevant sections of the order to the insurer. (R. 5:7-4(e)).
- 7. Social Security numbers are collected and used in accordance with section 205 of the Social Security Act (42 U.S.C. 405). Disclosure of an individual's Social Security number for Title IV-D purposes is mandatory. Social Security numbers are used to obtain income, employment, and benefit information on individuals through computer matching programs with federal and state agencies, and such information is used to establish and enforce child support under Title IV-D of the Social Security Act (42 U.S.C. 651 et seq.). Any person who willfully and with the intent to deceive, uses a Social Security number obtained on the basis of false information provided to Social Security Administration or provides a false or inaccurate Social Security number is subject to a fine or imprisonment. (42 U.S.C. 408(7); R. 5:7-4(e)).
- 8. The United States Secretary of State is required to refuse to issue or renew a passport to any person certified as owing a child support arrearage exceeding the statutory amount. In addition, the U.S. Secretary of State may take action to revoke, restrict or limit a passport previously issued to an individual owing such a child support arrearage, (42 U.S.C. 652(k)).
- 9. Failure to appear for a hearing to establish or to enforce an order, or failure to comply with the support provisions of this order may result in incarceration. The obligee and obligor shall notify the appropriate Probation Division of any changes in address, employment status, health care coverage, or a change in the address or status of the child(ren). Changes must be reported in writing to the Probation Division within 10 days of the change. Not providing this information is a violation of this Order. The last address you give to Probation will be used to send you notices. If you fail to appear, a default order may be entered against you or a warrant may be issued for your arrest (R. 5:7-4(e)).
- 10. Any payment or installment for child support shall be fully enforceable and entitled to full faith and credit and shall be a judgment by operation of law on and after the date it is due (N.J.S.A. 2A: 17-56.23.a). Any non-payment of child support you owe has the effect of a lien against your property. This child support lien may affect your ability to obtain credit or to sell your property. Failure to remit timely payment automatically results in the entry of a judgment against the obligor and post-judgment interest may be charged. Judgments [also] accrue interest at the rate prescribed by Rule 4:42-11(a). (R. 5:7-4(e), 5:7-5(g)). Before the satisfaction of the child support judgment, any party to whom the child support is owed has the right to request assessment of post-judgment interest on child support judgments.
- All child support obligations are payable by income withholding unless otherwise ordered. If immediate income withholding is not required when an order is entered or modified, the child support provisions of the order may be subject to income withholding when the amount due becomes equal to, or in excess of the amount of support due for 14 days. The withholding is effective against the obligor's current and future income from all sources authorized by law. (R. 5:7-4(e), R. 5:7-5).
- 12. The occupational, recreational, and professional licenses, including a license to practice law, held or applied for by the obligor may be denied, suspended or revoked if: 1) a child support arrearage accumulates that is equal to or exceeds the amount set by statute, or 2) the obligor fails to provide health care coverage for the child as ordered by the court, or 3) a warrant for the obligor's arrest has been issued by the court for obligor's failure to pay child support as ordered, or for obligor's failure to appear at a child support hearing to enforce a child support order and said warrant remains outstanding. (R. 5:7-4(e)).
- 13. The driver's license held or applied for by the obligor may be denied, suspended, or revoked if 1) a child support arrearage accumulates that is equal to or exceeds the amount set by statute, or 2) the obligor fails to provide health care coverage for the child as ordered by the court. The driver's license held or applied for by the obligor shall be denied, suspended, or revoked if the court issues a warrant for the obligor's airest for failure to pay child support as ordered, or for failure to appear at a hearing to establish paternity or child support, or for failure to appear at a child support hearing to enforce a child support order and said warrant remains outstanding. (R. 5:7-4(e)).
- 14. The name of any delinquent obligor and the amount of overdue child support owed will be reported to consumer credit reporting agencies as a debt owed by the obligor, subject to all procedural due process required under State law. (N.J.S.A. 2A: 17-56.21).
- Child support arrears may be reported to the Internal Revenue Service and the State Division of Taxation. Tax refunds/homestead rebates due the obligor may be taken to pay arrears (N.J.S.A. 2A:17-56.16).
- 16. Child support arrears shall be paid from the net proceeds of any lawsuit, settlement, civil judgment, civil arbitration award, inheritance or workers' compensation award to a prevailing party or beneficiary before any monies are disbursed. (N.J.S.A. 2A:17-56.23b).



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- 17. Periodic or lump sum payments from State or local agencies, including lotteries, unemployment compensation, workers' compensation or other benefits, may be seized or intercepted to satisfy child support arrearages. (N.J.S.A. 2A:17-56.53).
- If you owe past due child support, your public or private retirement benefits, and assets held in financial institutions may be attached to satisfy child support arrearages. (N.J.S.A. 2A:17-56.53).
- 19. A person under a child support obligation, who willfully fails to provide support, may be subject to criminal penalties under State and Federal law. Such criminal penalties may include imprisonment and/or fines. (N.J.S.A. 2C:24-5; N.J.S.A. 2C:62-1; 18 U.S.C.A. 22).
- 20. If this order contains any provision concerning custody and/or parenting time, both parties are advised: Failure to comply with the custody provisions of this court order may subject you to criminal penalties under N.J.S.A. 2C:13-4, Interference with Custody. Such criminal penalties include, but are not limited to, imprisonment, probation, and/or fines.
  Si esta orden contiene alguna disposicion con respecto a la custodia o el horario de las visitas patemas o matemas, se informa a ambas partes que: De no cumplir con las disposiciones de esta orden judicial sobre la custodia, pueden estar sujetas a las penalidades establecidas para esa conducta penal en N.J.S.A. 2C:13-4, Interferencia con la Custodia. Tales penalidades incluyen encarcelamiento, libertad a prueba y multas, pero no se limitan a las penas mencionadas.



The Law Office of

David Perry Davis 112 West Franklin Ave Pennington NJ 08534 (609) 737-2222 (609) 737-3222 (fax) Attorney ID: 047451996 Attorney for plaintiff class

Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, Paulo : CHANCERY DIVISION Arede, individually and on behalf of all persons similarly : DOCKET NO. MER-L-1004-15 situated.

Plaintiffs

VS.

Raymond P. Martinez, in his official capacity as Chief Administrator of the New Jersey Motor Vehicle Commission, and The New Jersey Motor Vehicle Commission,

John Jay Hoffman, Esq., in his official capacity as Acting Attorney General of the State of New Jersey, and The State of New : Jersey,

Natasha Johnson, in her official: capacity as Director of the Department of Human Services, Division of Family Development, Office of Child Support Services, and Department of Human Services, Division of Family Development, Office of Child Support Services,

Defendants

: SUPERIOR COURT OF NEW JERSEY : MERCER COUNTY

Civil Action

CERTIFICATION OF : LAOUAY DANSBY IN SUPPORT OF APPLICATION FOR PARTIAL SUMMARY JUDGMENT

LaQuay Dansby, of full age, being duly sworn, hereby certifies as follows:

- 1. I am a named plaintiff in the above-captioned matter and make this certification in support of the within application. I am personally familiar with all the facts alleged herein.
  - 2. I have been subject to many license suspensions as a



result of my inability to remain current on my child support obligation. An unofficial copy of my abstract is attached, which I affirm is genuine. It only goes back five years, and it shows four suspensions during that time period, all of which were for child support.

- 3. I am on "two week warrant status." My total arrears are more than the amount due for two weeks and I am thus subject to a warrant at any time and "without additional notice."
- 4. I have received suspension notices that inform me that my license had already been suspended. I have never received a notice from MVC informing me that a court-ordered suspension would be effective 20 days later if I did not act. I have never been offerred a hearing as to the specific issue of whether suspending my license would help or hurt my ability to pay support.
- 5. I have received "Notice of Delinquency" and "Notice of Intent to Issue Bench Warrant" notices such as those attached at various times (Exhibit F-9 through F-21). Sometimes they come every month, sometimes it will be many months before one arrives. They are not consistent. They do not contain a specific date that a warrant will be issued, nor do they inform me of a right to a hearing.
- 6. They are also not always sent. A court order placing me on two week bench warrant status was entered on September 13, 2010 (Exhibit F-22 to F-23). We were back in court on October 1, 2010 regarding my attempts to maintain a relationship with my son (Exhibit F-24 to F-25).
- 7. Three days later, on October 4, 2010 (Exhibit F-8), without my receiving any type of warning notice (neither a "Notice of Delinquency" nor a "Notice of Intent to Issue Bench Warrant"), a warrant was issued and my license suspended. I had not received

(-)

any notice since a "Notice of Delinquency" of September 21, 2009 (Exhibit F-11) (well before our court date) and did not receive any other warning notice (a "Notice of Intent to Issue Bench Warrant") until December 1, 2010 (Exhibit F-12) - two months after the October 10, 2010 suspension was imposed (Exhibit F-8).

- 8. I have learned of a license suspension as a result of being pulled over and being issued a summons for Driving While Revoked. My abstract shows entries on January 18, 2011 and February 23, 2012, and for "unlicensed driver" convictions. Both of these were plea bargains down from an original charge of Driving While Revoked. Each resulted in fines of roughly \$288 (\$250 fine and \$33 court costs). Each also resulted in the imposition of a motor vehicle surcharge. My abstract shows entries for my failure to keep up with the surcharge payments. I would not have incurred any of these costs (the fines or surcharges) had I been notified in advance that my license had been suspended and that, unless I acted, the suspension would be effective 20 days from my receipt of the notice. My having to pay these fees (and the restoration fees) to the MVC meant that I could not pay that money toward child support.
- 5. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

DATED: 8/19/6

La'Quay Dansby

LaOuay Dansby

4-3

## ATTORNEY CERTIFICATION PURSUANT TO R. 1:4-4 (c)

David Perry Davis, of full age, hereby certifies as follows

- 1. I am an attorney at law of the State of New Jersey. I represent the plaintiffs Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, and Paulo Arede in this matter.
- 2. I was not able to personally meet with my client to obtain a signature. However, my client has authorized me to affix their signature and has acknowledged the genuineness of the signature to me.
- 3. I am filing this certification so that the Court may accept the signature as if it were an original. An original signature will be filed if requested by the Court or another party.
- 4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

DATED: 8/20/2015

Bavid Perry Davis, Esq.

## new jersey motor vehicle commission

ACA1/AB MOTOR VEHICLE SERVICES 08/07/2015 16:10 ACAML06 DRIVER HISTORY ABSTRACT / 5 YEAR DISPLAY TL300027 D.L. NO: D0471 NAME: LAQUAY L DANSBY LIC EXP DT: 12/31/2018 ADDRESS: 108 CARDINAL ROAD VEH CLASS: D EGG HRBR TWP NJ 08234-1604 BOAT CLASS: RESTRICTIONS: **ENDORSEMENTS:** S CHFm MZT EVENT DT EVENT CD EVENT DESCRIPTION V M L PTS POSTED 07 10 15 RES F LWCC LICENSE REST FEE PAYMT- WEB/CREDIT 071015 AC07 10 15 RES R RSTR RESTORATION OF INDICATED PRIVILEGE 071115 AC03 22 15 ISS O ISNP NON PAYMENT OF INSURANCE SURCHARGE RS 032215 12 26 14 RES R RSTR RESTORATION OF INDICATED PRIVILEGE AC 122614 12 22 14 RES F LWCC LICENSE REST FEE PAYMT- WEB/CREDIT 122214 AC 08 03 14 ISS O ISNP NON PAYMENT OF INSURANCE SURCHARGE RS 080314 09 25 13 L96 O FPCS COURT-ORDERED SUS: CHILD SUPPORT RS 092613 080413 08 04 13 ISS O ISNP NON PAYMENT OF INSURANCE SURCHARGE RS 11 29 12 L96 O FPCS COURT-ORDERED SUS: CHILD SUPPORT RS 113012

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## new jersev motor zehrele commission 🖂

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Kavadas et al v. Martinez et al

## new jetsev motor vehicle commission 🚶

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MOTOR VEHICLE SERVICES

08/07/2015 16:11

ACAML06

DRIVER HISTORY ABSTRACT / 5 YEAR DISPLAY D.L. NO: D0471 44173 04712

TL300027

NAME: LAQUAY L DANSBY

LIC EXP DT: 12/31/2018

ADDRESS: 108 CARDINAL ROAD

VEH CLASS: D

EGG HRBR TWP

NJ 08234-1604

BOAT CLASS: S CHF

ENDORSEMENTS:

RESTRICTIONS:

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## new jersev moter vehicle commission

ACAI/AB ACAML06 MOTOR VEHICLE SERVICES

D.L. NO: D0471 44173 04712

DRIVER HISTORY ABSTRACT / 5 YEAR DISPLAY

08/07/2015 16:11

TL300027

NAME: LAQUAY L DANSBY

ADDRESS: 108 CARDINAL ROAD

LIC EXF DT: 12/31/2018

VEH CLASS: D

EGG HRBR TWP NJ 08234-1604

BOAT CLASS:

SCHF

**ENDORSEMENTS:** 

RESTRICTIONS:

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EVENT DT EVENT CD

EVENT DESCRIPTION

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STATUS PRIVILEGES IN GOOD STANDING

\* HISTORY OF SUSPENSIONS \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\* SUSPENSIONS

BASIC DRIVING

SUSPENDED BETWEEN 2010-10-04 2010-11-17

BASIC DRIVING

2011-01-02 2011-01-19

BASIC DRIVING

2011-01-28 2012-04-23

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 03608-2406 Website: www.njchildsupport.org



(877)655-4371

Fax:

ANDERSON VERONICA A

Plaintiff x Obligee Obligor

**DANSBY LAQUAY** 

Defendant Obligee x Obligor

Docket No: FV-11-000797-08 Case ID: CS41834921B

NOTICE OF DELINQUENCY

LAQUAY DANSBY 108 CARDINAL RD

EGG HARBOR TWP, NJ 08234-1604

Probation Division, Child Support Enforcement

Dear LAQUAY DANSBY,

FENTON, NJ 08608-2406 On 06/05/2009 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the MERCER COUNTY Probation Division in the sum of \$ 130.00 WEEKLY. According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was \$ 500.00, on 07/08/2009. Docket No. FV 11-000797-05

Case 10: CS418349218

Plantif (x) Obliges 1 Conicer
Your account is in arrears of \$ 2,058.67 as of 07/21/2009.

DANSBY LAQUAY

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at 1-800-621-KIDS (5437) or via the Internet www.njchildsupport.org.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or internet site. If there is a reason why your payments have not been made or if your records differ, please contact the Probation Division at (877)655-4371 795, J. 34,00, C. 1708 200 S

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Thank you for your immediate attention to this matter. four account is in arreass of \$10.098.67

DOMBA MUAMBA

SENIOR PROBATION OFFICER

the Chile Bupport Hodine at 1-800-621

follomes folding the balance of your current arreats at any time, by contacting in and the government of the common terms with one of proceed propagations may result in notice proceedings to be mail ascerciants). This office is authorized in the conservor enforcement actions in subject support of

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Kavadas et al v. Martinez et al

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX-8068 TRENTON NJ 08608-2406 Website: www.njchildsupport.org

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108 CARDINAL RD EGG HARBOR TWP, NJ 08234-1604

Date: 08/20/2009

Case ID: CS41834921B

Docket Number: FV-11-000797-08

NOTICE OF INTENT OF BENCH WARRANT

Probation Division, Chied Support Enforcement, in July 1988 (1988)

The Production and a first training the state of the second state of the second

Dear LAQUAY DANSBY,

Terror 2008-1908-1908

A Training Seal World Herby Dr. and Top govern An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order, and the Probation Division's intention to ask the Court for the issuance of a warrantees are said to be

To avoid a bench warrant you must contact the undersigned at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

《美国文学》并含新行动 Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant

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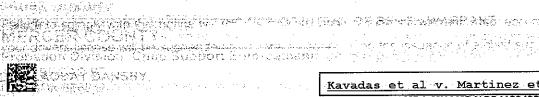
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THE REPORT OF THE PROPERTY OF

Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08608-2406 Website: www.njchildsupport.org



(877)655-4371

ANDERSON VERONICA A

Plaintiff: x Obligee Obligor

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DANSBY LAQUAY

Defendant Obligee X Obligor

Docket No: FV-11-000797-08

Date: 09/21/2009

NOTICE OF DELINQUENCY

LAQUAY DANSBY 108 CARDINAL RD EGG HARBOR TWP, NJ 08234-1604

Produing Division, Child Support Entercement

Dear LAQUAY DANSBY

BANSBYLAQUAY



On 06/05/2009 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the MERCER COUNTY Probation Division in the sum of \$ 130.00 WEEKLY. According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was \$ 40.00, on 09/01/2009. Onokel No. FV-15-000797 68

Your account is in arrears of \$ 2,148.67 as of 09/21/2009.

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In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at 1-800-621-KIDS (5437) or via the Internet www.njchildsupport.org

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please contact the Probation Division at (877)655-4371

Thank you for your immediate attention to this matter.

#### DOMBA MUAMBA

SENIOR PROBATION OFFICER

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Kavadas et al v. Martinez et al

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08650-0068 Website: www.njchildsupport.org



(877)655-4371

Fax:

To: LAQUAY DANSBY 108 CARDINAL RD EGG HARBOR TWP, NJ 08234-1604

Date: 12/01/2010 Case ID: CS41834921B

Docket Number: FV-11-000797-08

NOTICE OF INTENT OF BENCH WARRANT

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Robetion Division, Chud Support Enforcement.

Dear LAQUAY DANSBY,

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An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact the undersigned at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.

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Probation Child Support Enforcement Worker

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Kavadas et al v. Martinez et al F-1 211\DOMBA.MUAMBA\C\$41834921B\41843170

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08650-0068 Website: www.njchildsupport.org



(877)655-4371

Fax:

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To: LAQUAY DANSBY 108 CARDINAL RD EGG HARBOR TOWNSHIP, NJ 08234-1604

Date: 07/24/2012 Case ID: C\$41834921B

Docket Number: FV-11-000797-08

#### NOTICE OF INTENT OF BENCH WARRANT

## MERCER COUNTY

HOW BEING STORY

Propation Divisions Child Support a processment

Dear LAQUAY DANSBY,

TRENTON, NJ 08550-0068

Website www.nichiosubbort.org

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An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

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To avoid a bench warrant you must contact the undersigned at (609)571-4227, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your-drivers license will be suspended by operation of law upon the issuance of a child support related warrant.

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B<mark>äs (Tagray Bänsby</mark>) B.C. B.C.X.2068 BRENTON, AU 00650-0068

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Probation Child Support Enforcement Worker

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Kavadas et al <u>v. Martinez et al</u> F-13

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08650-0068 Website: www.njchildsupport.org



(877)655-4371

ax:

To: LAQUAY DANSBY

Jarga Jah Jare

108 CARDINAL RD

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EGG HARBOR TOWNSHIP, NJ 08234-1604

Date: 10/26/2012 Case ID: CS41834921B

Docket Number: FV-11-000797-08

SUCKE CHARGE

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#### NOTICE OF INTENT OF BENCH WARRANT

MERCERCOUNTY

Propertion Civisian, Child Support Enforcement

### Dear LAQUAY DANSBY,

THEN TON, NUMBERSO, ORG.

(877)658-4371

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact the undersigned at (609)571-4227, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.

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Probation Child Support Enforcement Worker

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Kavadas et al v. Martinez et al F-14

**Probation Division, Child Support Enforcement** 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08650-0068 Website: www.njchildsupport.org



(877)655-437

Fax:

ANDERSON VERONICA A Plaintiff X Obligee Obligor

Docket No: FM-11-000504-11 Case ID: CS41834921B

Date: 05/01/2013

DANSBY LAQUAY

Defendant Obligee X Obligor

NOTICE OF DELINQUENCY

LAQUAY DANSBY 108 CARDINAL RD

EGG HARBOR TOWNSHIP, NJ 08234-1604

Dear : LAQUAY DANSBY . SACO-OBBSOLIA NOTAZAT

Rehim I.J. Lystons FE, Ophnor

105-3 BROAD ST

On 02/12/2013 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the MERCER COUNTY Probation Division in the sum of \$ 138.00 WEEKLY . According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account Contract No. FM-41-000508411 was \$ 140.00, on 09/05/2012. (1998 (I) 0.004 (804 621 B)

Your account is in arrears of \$ 13,378.67 as of 05/01/2013.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371 or via the Internet www.nichildsupport.org

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371

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Thank you for your immediate attention to this matter.

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**BILINGUAL PROBATION OFFICER** 



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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ08650-0068 Website: www.njchildsupport.org



(877)655-4371

ax:

To: LAQUAY DANSBY
511 E GIBBSBORO RD
#3312
LINDENWOLD,NJ08021

Date:09/20/2013

Case ID:CS41834921B

Docket Number:FM-11-000504-11

HERCEN COUNTY

ABBIR BROYL

NOTICE OF INTENT OF BENCH WARRANT

Propetion Division, Child Spenor, Entercament 178 S BROAD ST

Dear LAQUAY DANSBY,

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Wessie Windschiffsloweto

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the

order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41, a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.



Kavadas et al v. Martinez et al F-16

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08650-0068 Website: www.njchildsupport.org



(877)655-4371

Fax:

Docket No: FM-11-000504-11 ANDERSON VERONICA A Plaintiff X Obligee Obligor

Case ID: CS41834921B

Date: 02/24/2014

DANSBY LAQUAY

Defendant Obligee X Obligor

VS.

#### NOTICE OF DELINQUENCY

LAQUAY DANSBY 511 E GIBBSBORO RD

PORROR

lid Support Entarcement LINDENWOLD, NJ 08021

Dear LAQUAY DANSBYS

kvsture www.njoniosuppon orgi

Osto, 02/24/2014

On 02/12/2013 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the MERCER COUNTY Probation Division in the sum of \$ 141.00 WEEKLY . According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was, \$ 280,00, on 01/06/2014. Case (D. CS4/8349213

Your account is in arrears of \$ 15,961.67 as of 02/24/2014.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371 or via the Internet www.nichildsupport.org

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371

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Thank you for your immediate attention to this matter.

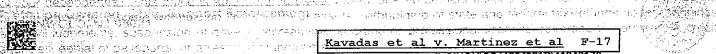
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JASBIR SINGH

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BILINGUAL PROBATION OFFICER

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Kavadas et al v. Martinez et al 211\JASBIR.SINGH\CS41834921B\41843170

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON,NJ08650-0068 Website: www.njchildsupport.org



(877)655-4371

Fax:

To: LAQUAY DANSBY

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511 E-GIBBSBORO RD

45.#3312 PARTER PROPERTY OF

LINDENWOLD, NJ08021

Date:02/27/2014 Case ID: CS41834921B

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NOTICE OF INTENT OF BENCH WARRANT

Potential Division, Chief Support Empirement

Dear LAQUAY DANSBY,

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170 B BROAD ST

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An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant.



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Kavadas et al v. Martinez et al F-18

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ 08608-2406 Website: www.njchildsupport.org



(877)655-4371

Fax:

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Plaintiff X Obligee Obligor

VS

DANSBY LAQUAY

Defendant Obligee X Obligor

Docket No: FM-11-000504-11 Case ID: CS41834921B

Date: 09/12/2014

Damir (1981) 7:2014

#### NOTICE OF DELINQUENCY

LAQUAY DANSBY 511-E GIBBSBORO RD V #3312

#9012auan Division. Chiid Shaban Enforcement LINDENWOLD, NJ 08021

P 5 30X 3068

Dear LAQUAY DANSBY:

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On 02/12/2013 an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the MERCER COUNTY Probation Division in the sum of \$ 141.00 WEEKLY. According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account was \$ 140.00, on 08/26/2014.

Your account is in arrears of \$ 22,240.67 as of 09/12/2014.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371 or via the Internet <a href="https://www.njchildsupport.org">www.njchildsupport.org</a>.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter.

YANETLIZA GARCIA

pachary bensay Bensy bensay

INVESTIGATOR



CS022.35358287

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Kavadas et al v. Martinez et al F-19

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Probation Division, Child Support Enforcement 175 S BROAD ST P.O. BOX 8068 TRENTON, NJ08608-2406 Website: www.njchildsupport.org



(877)655-4371

To: LAQUAY DANSBY 108 CARNIAL RD EGG HARBOR TW,NJ08232

Date: 02/03/2015 Case ID: CS41834921B Docket Number: FM-11-000504-11

#### NOTICE OF INTENT OF BENCH WARRANT

WERGER CONNTY ---

CHARLETT ATTITUDE

i karang pagukan da beber

Probation Division, Child Support Enforcement

## Dear LAQUAY DANSBY. TRENTOR NUCCEUS 2408

BEZ-LACOLAR BLANSEY.

TRENT CHARGOSE \$1-1408 THE TOCCOUNTAIN THE TAINED DOCTOR

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Westard Will he had been on An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined in the order, a warrant may be issued for your arrest. This letter will serve as notice to you of your failure to comply with the order and the Probation Division's intention to ask the Court for the issuance of a warrant.

To avoid a bench warrant you must contact Customer Service at (877)655-4371, within 10 business days of receipt of this letter, to make other arrangements. In the alternative, you may file a formal motion with the Court of venue and supply a copy to your investigator, also with 10 business days.

Failure to comply with this notice will result in the issuance of a bench warrant. Also, according to N.J.S.A. 2A:17-56-41.a, your drivers license will be suspended by operation of law upon the issuance of a child support related warrant obation Division, Chile

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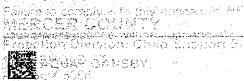
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**Probation Division, Child Support Enforcement** 175 S BROAD ST

P.O. BOX 8068 TRENTON, NJ 08608-2406

Website: www.njchildsupport.org

일이 가진 그는 당시에 발생이 들고 화면함.



(877)655-4371

Fax:

Docket No: FM-11-000504-11

Case ID: C\$41834921B

Date: 06/09/2015

Jak D COATESSEEE

### ANDERSON VERONICA A

Plaintiff x Obligee Obligor

DANSBY LAQUAY

Defendant Obligee X Obligor

NOTICE OF DELINQUENCY

LAQUAY DANSBY

325 GRAND STOUNT

THE BROAD ST

PATERSON, NJ 07505-2015

Dear LAQUAY DANSBY,

Remarks a Oskove Talkarov

TAENTON, N. 08608-2400 On 02/12/2013an ORDER/JUDGEMENT was entered directing you to make support and/or arrears payments through the MERCER COUNTYProbation Division in the sum of \$ 141.00 WEEKLY. According to our records, we have not received payments from you in accordance with the court order. Specifically, the last regular payment posted to your account Dames No FAS-11-000504-11 was \$ 280.00, on 05/19/2015.

Your current balance owed is \$ 22,089.67as of 06/09/2015.

In order to be in compliance with this court ordered obligation, you must resume support payments on a timely basis and take measures to satisfy any outstanding arrears. You may obtain the balance of your current arrears at any time by contacting the Child Support Hotline at (877)655-4371or via the Internet www.njchildsupport.org.

Please be advised that continued non-compliance with court ordered obligations may result in court proceedings on behalf of your dependent(s). This office is authorized to use a variety of enforcement actions to collect support debts including, but not limited to, income withholding, the seizure of assets, withholding of state and federal tax refunds, lottery winnings and civil judgments, suspension of drivers, recreational, sporting or professional licenses, reporting to commercial credit agencies, denial of passports, or arrest and/or incarceration.

It is essential that you resolve this matter immediately to avoid further action by this office to collect this debt. If you have already resumed making current support payments and have also made payment to satisfy the arrears balance, you should confirm receipt of your payment(s) via the above listed telephone number or Internet site. If there is a reason why your payments have not been made or if your records differ, please call Customer Service at (877)655-4371 our No AM-TAGUSSUA-11

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Thank you for your immediate attention to this matter.

LASHAWN JOHNSON

CHILD SUPPORT PROGRAM WORKER



Ship year promonent appropriate to the second of the second

SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, FAMILY PART ANDERSON VERONICA A Plaintiff x Obligee Obligor Docket No. FV-11-000797-08 Probation Account No. CS41834921B DANSBY LAQUAY ORDER FOR RELIEF TO LITIGANT -Defendant Obligee x Obligor **ENFORCEMENT OF LITIGANT'S RIGHTS** With appearance by: **Plaintiff** Attorney for Plaintiff Defendant Attorney for Defendant **IV-D** Attorney **MERCER COUNTY Probation Division** JENN BROWN THIS MATTER having come before the Court on the 13 day of SEPTEMBER, 2010; AND the Court having considered the evidence and arguments presented, and having found that: The obligor is under a Court Order to pay \$ 103.00 per WEEKLY for the support of 1 child(ren), \$ 0 per spousal support and \$ 30.00 per WEEKLY toward arrearages effective 02/04/2008; The obligor has failed to make payments and owes arrearages totaling \$ 7.061.67 as of 09/13/2010 due to the Obligee Welfare: The obligor is indigent and: qualifies for court appointed counsel, but none is available; qualifies for court appointed counsel and is appointed; The obligor is not indigent and does not qualify for court appointed counsel; The obligor has the current ability to pay \$ toward the arrearages; The obligor has the financial ability to pay and refuses to do so, and that incarceration of the obligor is necessary to coerce compliance; AND the Court having further found that: \$100.00 paid today Therefore it is hereby ORDERED that: The obligor be incarcerated in the County Jail until the Obligor pays \$ to be applied to said arrears or until further Order of this Court. The Court will review the continuing efficacy of this Order for coercive incarceration no later than two weeks from the date of this Order so long as the above release payment is not paid and the Obligor remains incarcerated. The obligor be released from custody in this matter;

The support-related bench warrant currently issued in this matter is discharged;



	Payments shall be made by Income Withholding on c	urrent and future income sources, including: Address of income source:			
	_	The state of the s			
	Obligor shall, however, make payments at any time t	hat the full amount of support and arrears is not withheld.			
	The Obligor shall make support payments of \$ per p	lus \$ per toward arrears for a total amount of \$ per.			
	A lump sum payment of \$ must be paid by the obligo without further notice.	r by or a bench warrant for the arrest of the obligor shall issue			
X	Effective <u>09/13/2010</u> future missed payment(s) number further notice.	ering 2 or more may result in the issuance of a warrant, without			
	An employment search must be conducted by the ob- presented to the Probation Division. If employed, pro- be provided immediately to the Probation Division.	ligor. Written records of at least # contacts per week must be of of income and the full name and address of employer must			
	The obligor is hereby noticed to appear before this c the child support obligation. The <u>MERCER COUNTY</u> F other interested parties, if any, in this matter.	ourt on at in for further review and possible modification of family/ Probation Division shall serve notice to the Obligee and			
区	The Motor Vehicle Commission, State of New Jersey, shall TAKE NOTICE that the suspension of the Obligor's Drivers License caused by the non-payment of child support is hereby removed; the Obligor must take note, however, that the Commission requires a fee for restoration of the license, and that this order does not pertain to any reason for license suspension other than non-payment of child support.				
X	It is further ORDERED: obligor advised of his right to file				
	s further ORDERED that all provisions of any prior Orde force and effect.	rs in this matter, not in conflict with this Order, shall remain in			
		Alkalli			
09/13	<u>13/2010</u>				

Date

LAWRENCE P DEBELLO, J.S.C.

	**************************************	SUPERIOR COURT	OF NEW JERSEY	
ANDERSON VERONICA A DANSBY LAQUAY		Chancery Division-Family Part		
PLAINTIFF VS	S DEFENDANT		DER	
Obligor X Obligee	X Obligor Obligee	COUNTY: MERCER COUNTY		
HEARING DATE	WELFARE/U.I.F.S.A.#	DOCKET#: FV-11-000797-08		
10/01/2010	C086996011	CS#: CS41834921B		
With appearance by: X P			tty for DEF	
IV-D Atty	- L.	obation Division		
	the court by: Plaintiff x Defend	lant County Welfare Agency rnity Support X Visitation	Printedia	
Enforcement Modification		Tilly [   Support [X] Visitation [	Castody	
State with Continuing Exclusion	usive Jurisdiction:NEW JERSEY			
CHILD'S NAME	BIRTH DATE	CHILD'S NAME	BIRTH DATE	
ZA. DANSBY KOFO E	08/10/1997	2D.		
28.		2E.		
2C.		2F.		
3. PATERNITY of child(	ren) (# above) is hereby	established and an ORDER of patern	nity is hereby entered.	
4. A Certificate of Parent	tage has been filed for child(ren) #	above.		
5. T IT IS HEREBY ORDE	RED THAT: The obligor shall pay sur	pport to the New Jersey Family Suppo	rt Payment Center in the amount of:	
1+1	T1+1	payable	effective	
Child Support Spousal Supp		Total Frequency	Date	
	<del>؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞؞</del>	t-of-living adjustment in accordance	e with R. 5:6B	
<ol> <li>Child Support Guideling</li> <li>Worksheet attached.</li> </ol>	nes Order Deviation r	eason:		
	administered and enforced by the D	robation Division in the county of Venu	MERCER COUNTY County	
		upon amounts and effective date note		
\$	THE COMMUNICIONS IN THE PROPERTY OF THE PROPER	opportunition of the appointed that the control of		
9. X ARREARS indicated in the records of the Probation Division, are \$ 7.150.67 as of 10/01/2010				
10. GROSS WEEKLY INCOMES of the parties, as defined by the Child Support Guidelines, upon which thisORDER is based:				
OBLIGEE \$		OBLIGOR \$		
	11. INCOME WITHHOLDING is hereby ORDERED on current and future income sources, including:			
Name of income source: Address of income source:				
		Minimum department of the second of the seco		
		E that the full amount of support and a	rrears is not withheld.	
12. Medical Support coverage as available at reasonable cost shall be provided for the				
Child(ren) spouse, by Obligor Obligee Both The parties shall pay unreimbursable health care expenses of the child(ren) which exceed \$250.00 per child per year as follows:				
१८८० हाला हाला वर्गा साथ हिस्सा है। जा	% Obligee			
	Pursuant to R 5:6A the obligee shall be responsible for the first \$250.00 per child per year.			
If coverage is available, Medical (nsurance I.D. card(s) as proof of coverage for the child(ren)/spouse shall be provided immediately				
upon availability to the Probation Division by the:  Obligee Obligor				
	Insurance currently provided by a non-party:			
	Health insurance benefits are to be paid directly to the health care provider by the insurer.			

DOCKET	# FV-11-000797-08	CS# <u>CS41834921B</u>	HEARING DATE	10/01/2010	PAGE 2 OF 2
13.	GENETIC TESTING to assist the	court in determining pate	ernity of the child(ren)(#	) is herel	by ORDERED. The county
	welfare agency or the foreign	jurisdiction in the county	of residence of the child s	hall bear the cost of	f said testing, without prejudice
	to final allocation of said cost	s. If defendant is later adj	udicated the father of said	l child(ren), defenda	int shall reimburse the welfare
l	agency for the costs of said t		rt retroactive to		
13A.	Issues of reimbursement res		13B. Issue of retro		
14.	This matter is hereby RELISTE	D for a hearing on	before	, A copy of this OF	RDER shall serve as the
į.			earance shall be given.	-allure to appear ma	y result in a default order, bench
	warrant, or dismissal. Reason AN EMPLOYMENT SEARCH MUS	HOF FERSE	isi inan Walton conorde (	viatione # em	ployment contacts her week
15.	must be presented to the Pro	I BE CONDUCTED BY THE C	ad proof of income and the	on full name and add	tress of employer must be
ļ	provided immediately to the F		ed, proof of modific and s	IC ION HOUSE SING DOL	arded by engine at the con-
16.	SERVICE upon which this orde	and the state of t			
10.		ris baseu. Hified Mail:	☐ Refused	Reg	ular Mail (not returned)
	Same Same	ned by:	Returned Uncla		
4-7	A BENCH WARRANT for the arre			ш -	
17.	appearance on	and failed to cancer (See	vice noted shove) An an	hount of \$	shall be required for
	release.	and range to appear. (Ser	AICC HOISO BROYOTH OIL	rount or V	
18.		E MESES BAVMENTIEL DIT	nbering of	more may result in	the issuance of a warrant,
10.	without it ther notice.	re wissen twi weu ifal iini	Upoungo,	,,,o,o ,,,,,,,, , , , , , , , , , , , ,	
19.	A LUMP SUM PAYMENT OF \$	muet he made	thy the obligar by	or a bench wa	errant may be issued without
ري .ه.	further notice.	most be made	by the obliger by		
20.	This complaint / motion is here	by DISMISSED: /reason)			
21.	Order of Support is hereby TE		. as		Arrears accrued prior to effective
I	date, if any, shall be paid at the	e rate and frequency note			
22.	THIS ORDER IS ENTERED BY DEF	ALUT The Limbbook	hligee was properly serv	ed to appear for a h	earing on
	and failed to appe	ar 22A Affidavi	t of Non-Military Service i	s filed.	
23. X	It is further ORDERED. The n	arties are referred to Di	Joe Cooper at 860 Lov	ver Ferry Rd. Ewin	g. NJ 08628 for parenting time
L	evaluations. The cost of sa	d evaluations shall be	incurred by the Court.	All pareting time	is hereby suspended until the
	evaluvations are complete."	he parties are to conta-	ct Dr. Joe Cooper at (21	<u>5) 208-4194.</u>	
	EXCEPT AS PROVIDE	HEREIN, ALL PRIOR ORDE	RS OF THE COURT REMAIN	IN FULL FORCE AND	EFFECT.
	I hereby declare that I underst	and all provisions of this (	ORDER recommended by	/ a Hearing Officer a	and I waive my right to an
	immediate appeal to a Superio				
<b>PLAINTIFF</b>		_	DEFENDANT		
ATTORNEY	FOR PLAINTIFF		ATTORNEY FOR DEFE	NDANT	
24.	INTAKE CONFERENCE BY AUTHO				
25.	The parties request the termin	ation of all Title IV-D serv	ices and consent to direc	t payment of suppor	t. They are advised that all
			s available under Title IV	-D of the Social Sec	urity Act are no longer in effect.
	understand   may reapply for	Title IV-D services.			
					obligor
	obligee			A CONTRACT OF THE PARTY OF THE	
26. X	Copies provided at hearing to TAKE NOTICE THAT THE NEW JER	x obligee x obligor	ZOA. X Copies to be ma	ned to [x] opiliges	EX COURS OF COURT AND
	TAKE NOTICE THAT THE NEW JER WHICH FOLLOW, ARE INCORPORA	SEY UNIFORM SUPPORT NO	PEERFINE AND ARE PROVID	NG ON ALL PARTIES	or the notes of oceaniate
	So Recommended to the Cou				
	Date	t of the mounty onton		ignature	
	So Ordered by the Court:				
		dge MASSI ANTHONY			J.S.C.
		nde munne un i i mis i .	a <del>.n</del> .	m m Wasar	
			CARALAS	my m. Massi	
			Signature	·	

#### **NEW JERSEY UNIFORM SUPPORT NOTICES**

#### TAKE NOTICE that the following provisions are to be considered part of this order and are binding on all parties:

- You must continue to make all payments until the court order is changed by another court order.
- You must file a WRITTEN request to the Family Division in the county in which the order was entered in order for the count to consider a change in the support order. Contact the Family or Probation Division to find out how to do this. It is important that you request a change as soon as possible after your income or the child(ren)'s status changes. In most cases, if you delay making your request, and you are the obligor, you will have to pay the original amount of support until the date of your written request.
- 3. Payments must be made directly to the New Jersey Family Support Payment Center, P.O. Box 4880, Trenton, NJ 08650, unless the court directs otherwise. Payments may be made by money order, check, direct debit from your checking account, or credit card. Gifts, other purchases, or in-kind payments made directly to the obligee or child(ren) will not fulfill the support obligation. Credit for payments made directly to the obligee or child(ren) may not be given without a court order.
- No payment or installment of an order for child support, or those portions of an order that are allocated for child support, shall be retroactively
  modified by the court except for the period during which the party seeking relief has pending an application for modification as provided
  in N.J.S.A. 2A:17-56.23a. (R. 5:7-4(e)).
- 5. The amount of child support and/or the addition of a health care coverage provision in Title IV-D cases shall be subject to review at least once every three years, on written request by either party to the Division of Family Development, P.O. Box 716, Trenton, NJ 98625-0716, as appropriate, or upon application to the court. (N.J.S.A. 2A: 17-56.9a; R, 5:7-4(e)).
- In accordance with N.J.S.A. 2A:34-23b, the custodial parent may require the non-custodial parent's health care coverage provider to make payments directly to the health care provider by submitting a copy of the relevant sections of the order to the insurer. (R. 5:7-4(e)).
- 7. Social Security numbers are collected and used in accordance with section 205 of the Social Security Act (42 U.S.C. 405). Disclosure of an individual's Social Security number for Title IV-D purposes is mandatory. Social Security numbers are used to obtain income, employment, and benefit information on individuals through computer matching programs with federal and state agencies, and such information is used to establish and enforce child support under Title IV-D of the Social Security Act (42 U.S.C. 651 et seq.). Any person who willfully and with the intent to deceive, uses a Social Security number obtained on the basis of false information provided to Social Security Administration or provides a false or inaccurate Social Security number is subject to a fine or imprisonment. (42 U.S.C. 408(7); R. 5:7-4(e)).
- 8. The United States Secretary of State is required to refuse to issue or renew a passport to any person certified as owing a child support arrearage exceeding the statutory amount. In addition, the U.S. Secretary of State may take action to revoke, restrict or limit a passport previously issued to an individual owing such a child support arrearage. (42 U.S.C. 652(k)).
- 9. Failure to appear for a hearing to establish or to enforce an order, or failure to comply with the support provisions of this order may result in incarceration. The obligee and obligor shall notify the appropriate Probation Division of any changes in address, employment status, health care coverage, or a change in the address or status of the child(ren). Changes must be reported in writing to the Probation Division within 10 days of the change. Not providing this information is a violation of this Order. The last address you give to Probation will be used to send you notices. If you fail to appear, a default order may be entered against you or a warrant may be issued for your arrest (R, 5:7-4(e)).
- 10. Any payment or installment for child support shall be fully enforceable and entitled to full faith and credit and shall be a judgment by operation of law on and after the date it is due (N.J.S.A. 2A: 17-56.23.a). Any non-payment of child support you owe has the effect of a lien against your property. This child support lien may affect your ability to obtain credit or to sell your property. Failure to remit timely payment automatically results in the entry of a judgment against the obligor and post-judgment interest may be charged. Judgments [also] accrue interest at the rate prescribed by Rule 4:42-11(a). (R. 5:7-4(e), 5:7-5(g)). Before the satisfaction of the child support judgment, any party to whom the child support is owed has the right to request assessment of post-judgment interest on child support judgments.
- All child support obligations are payable by income withholding unless otherwise ordered. If immediate income withholding is not required when an order is entered or modified, the child support provisions of the order may be subject to income withholding when the amount due becomes equal to, or in excess of the amount of support due for 14 days. The withholding is effective against the obligor's current and future income from all sources authorized by law. (R. 5:7-4(e), R. 5:7-5).
- The occupational, recreational, and professional licenses, including a license to practice law, held or applied for by the obligor may be denied, suspended or revoked if: 1) a child support arrearage accumulates that is equal to or exceeds the amount set by statute, or 2) the obligor falls to provide health care coverage for the child as ordered by the court, or 3) a warrant for the obligor's arrest has been issued by the court for obligor's failure to pay child support as ordered, or for obligor's failure to appear at a child support hearing to enforce a child support order and said warrant remains outstanding. (R. 5:7-4(e)).
- 13. The driver's license held or applied for by the obligor may be denied, suspended, or revoked if 1) a child support arrearage accumulates that is equal to or exceeds the amount set by statute, or 2) the obligor fails to provide health care coverage for the child as ordered by the court. The driver's license held or applied for by the obligor shall be denied, suspended, or revoked if the court issues a warrant for the obligor's arrest for failure to pay child support as ordered, or for failure to appear at a hearing to establish patemity or child support, or for failure to appear at a child support hearing to enforce a child support order and said warrant remains outstanding. (R. 5:7-4(e)).
- 14. The name of any delinquent obligor and the amount of overdue child support owed will be reported to consumer credit reporting agencies as a debt owed by the obligor, subject to all procedural due process required under State law. (N.J.S.A. 2A: 17-56.21).
- 15. Child support arrears may be reported to the Internal Revenue Service and the State Division of Taxation. Tax refunds/homestead rebates due the obligor may be taken to pay arrears (N.J.S.A. 2A:17-56.16).
- 16. Child support arrears shall be paid from the net proceeds of any lawsuit, settlement, civil judgment, civil arbitration award, inheritance or workers' compensation award to a prevailing party or beneficiary before any monies are disbursed. (N.J.S.A. 2A:17-56.23b).



- Periodic or lump sum payments from State or local agencies, including lotteries, unemployment compensation, workers' compensation or other benefits, may be seized or intercepted to satisfy child support arrearages. (N.J.S.A. 2A:17-56.53).
- 18. If you owe past due child support, your public or private retirement benefits, and assets held in financial institutions may be attached to satisfy child support arrearages. (N.J.S.A. 2A:17-56.53).
- 19. A person under a child support obligation, who willfully fails to provide support, may be subject to criminal penalties under State and Federal law. Such criminal penalties may include imprisonment and/or fines. (N.J.S.A. 2C;24-5; N.J.S.A. 2C:62-1; 18 U.S.C.A. 22).
- 20. If this order contains any provision concerning custody and/or parenting time, both parties are advised: Failure to comply with the custody provisions of this court order may subject you to criminal penalties under N.J.S.A. 20:13-4. Interference with Custody. Such criminal penalties include, but are not limited to, imprisonment, probation, and/or fines.
  Si usted deja de cumplir con las clausulas de custodia de esta ordem del tribunal, puede estar sujeto (sujeta) a castigos criminales conforme

a N.J.S.A. 20:13-4. Interference with Custody, (Obstruccion de la Custodia). Dichos castigos criminales incluyen pero no se limitan a encarcelamiento, libertad, multas o una combinacion de los tres.

	· · · · · · · · · · · · · · · · · · ·	SUPERIOR COUR	T OF NEW JERSEY		
ANDERSON VERONICA A DANSBY LAQUAY PLAINTIFF VS DEFENDANT		Chancery Divi	Chancery Division-Family Part		
		OR	DER		
	X Obliger Obligee	COUNTY: MERCER COUNTY			
HEARING DATE WELFARE / U.I.F.S.A. # 10/02/2012 C086996011		DOCKET#: FV-11-000797-08			
		CS#: CS41834921B			
With appearance by: XP		Target 1	tty for DEF		
	X County Probation D		سيسود والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والم		
This matter having been opened to	o the court by: Plaintiff Defend	ant County Welfare Agency			
Visitation Custody	Division for an ORDER for: Pater	nity [_] Support			
X Enforcement Modification	n I bereses I Bernses				
	usive Jurisdiction:NEW JERSEY				
CHILD'S NAME		Mark the second to the second			
	BIRTH DATE	CHILD'S NAME	BIRTH DATE		
2A. DANSBY KOFO E 2B.	08/10/1997	2D.			
2C.		2E			
		] 2F.			
3. PATERNITY of child(	<del></del>	y established and an ORDER of pater	nity is hereby entered.		
<u> </u>	tage has been filed for child(ren) #	above.			
5. IT IS HEREBY ORDE	RED THAT: The obligor shall pay su	pport to the New Jersey Family Support	ort Payment Center in the amount of		
+	]=	payable	effective		
Child Support Spousal Supp	ort Arrears Payment	Total Frequency	Date		
		t-of-living adjustment in accordance	****		
6. Child Support Guidelin					
6A. Worksheet attached.					
7. Support order shall be	administered and enforced by the P	robation Division in the county of Ven	ie. MERCER COUNTYCounty:		
		upon amounts and effective date note			
\$					
9. X ARREARS indicated in the records of the Probation Division, are \$ 10.138.67as of 10/02/2012					
	COMES of the parties, as defined by	the Child Support Guidelines, upon w	nich thisORDER is based:		
OBLIGEE \$ OBLIGOR \$					
<del></del>		and future income sources, including			
Name of in	come source:	Add	ess of income source:		
	<del></del>				
OBLIGOR SHALL, how	vever, make payments AT ANY TIMI	E that the full amount of support and a	rrears is not withheld.		
12. Medical Support coverage as available at reasonable cost shall be provided for the					
child(ren) spouse, by Obligor Obligee Both					
ine parties shall pay u	The parties shall pay unreimbursable health care expenses of the child(ren) which exceed \$250.00 per child per year as follows:				
Program to D E.CA	% Obliger % Obligee				
	Pursuant to R 5:6A the obligee shall be responsible for the first \$250.00 per child per year.  If coverage is available, Medical Insurance I.D. card(s) as proof of coverage for the child(ren)/spouse shall be provided immediately				
upon availability to the Probation Division by the:					
Obligee Obligor					
	Insurance currently provided by a non-party:				
2B. Health insurance benef	Health insurance benefits are to be paid directly to the health care provider by the insurer.				

DOC	CKET#	# <u>FV-11-000797-08</u>	CS# <u>CS41834921B</u>	HEARING DATE	<u>10/02/2012</u>	PAGE 2 OF 2
13.			assist the court in determining			is hereby ORDERED. The county
1						st of said testing, without prejudice
					iid child(ren), defer	ndant shall reimburse the welfare
1			said tests, and pay child suppo			
13A	🔲	Issues of reimbursemen	nt reserved.	13B. Ssue of retr	roactive order rese	rved.
14.			ELISTED for a hearing on	before		his ORDER shall serve as the
l				arance shall be given. Fa	ilure to appear ma-	y result in a default order, bench
l		warrant, or dismissal, Re	eason for relist:	en en en en en en en en en en en en en e		
15.		AN EMPLOYMENT SE/	ARCH MUST BE CONDUCTED	D BY THE OBLIGOR, W	ritten records of at	l least #employment contacts
•	-		ented to the Probation Division.			
			diately to the Probation Division			
16.	×	SERVICE upon which th	nis order is based:			
İ	استسار	Personal Service	Certified Mail:	Refused	⊠Re	gular Mail (not returned)
į		two trans	Signed by:	Returned Uncla		
4.7				The state of the s		
17.			or the arrest of the obligor is he			
			, and failed to appear. (Serv			
18.	X		2 FUTURE MISSED PAYMENT	F(S) numbering 2	or more m	nay result in the issuance of a
<del></del>		warrant, without further n				
19.	X		IT OF \$ 1.000.00	must be made by the of	bligor by 11/15/201	12, or a bench warrant may be
·	-	issued without further not	fice.			
20.		This complaint / motion is	is hereby DISMISSED: (reason	.1)		
21.	市		by TERMINATED effective	, as		_ Arrears accrued prior to effective
<del></del> .	i		d at the rate and frequency note		of this ORDER.	2 4 #* <del>900.00</del> =0,0.1
22.	प्र	<del></del>	RED BY DEFAULT. The X obli			one for a hearing on
	***************************************	10/02/2012 and failed to a		it of Non-Military Service i		idi idira muning
~~.			appear, zevillument	Of Null-Minically Control	IS INEU.	
23,	<u> </u>	It is further ORDERED: _				
			OVIDED HEREIN, ALL PRIOR ORDE			
			nderstand all provisions of this (	ORDER recommended to	by a Hearing Office	r and I waive my right to an
		immediate appeal to a Su			,	
PLAIN				DEFENDANT		
		FOR PLAINTIFF		ATTORNEY FOR DEFE	ENDANT	
24.		INTAKE CONFERENCE BY AL				
25.		The parties request the te	ermination of all Title IV-D servi	ices and consent to direct	ct payment of supr	ort. They are advised that all
				s available under Title IV	/-D of the Social 5	Security Act are no longer in effect.
	7	I understand I may reapply	y for Title IV-D services.	•		
	,		·	•	·	
	· -	oblige	ee			obligor
26.		Copies provided at hearin	ng to Dobligee Dobligor 2	26A. Copies to be mail	led to Dobligee	obligor
	T	TAKE NOTICE THAT THE NEW	W JERSEY UNIFORM SUPPORT NO	OTICES WHICH ARE PROVID	DED IN APPENDIX XV	
			RPORATED INTO THIS ORDER BY R			
	ç	So Recommended to the	Court by the Hearing Officer:	<del></del>		
		Date 10/02/2012		CHAEL BARRY		
		·		****	TLI 1	3P
÷			· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	Signature	
**************************************	-	So Ordered by the Court:				
		Date 10/09/2012	Judge PETER WARSHAW			J.S.C.
					JAE ~	:
				- 1	سيست عسور	
				Signature		Į.

#### **NEW JERSEY UNIFORM SUPPORT NOTICES**

#### TAKE NOTICE that the following provisions are to be considered part of this order and are binding on all parties:

- You must continue to make all payments until the court order is changed by another court order.
- You must file a WRITTEN request to the Family Division in the county in which the order was entered in order for the count to consider a change in the support order. Contact the Family or Probation Division to find out how to do this. It is important that you request a change as soon as possible after your income or the child(ren)'s status changes. In most cases, if you delay making your request, and you are the obligor, you will have to pay the original amount of support until the date of your written request.
- 3. Payments must be made directly to the New Jersey Family Support Payment Center, P.O. Box 4880, Trenton, NJ 08650, unless the court directs otherwise. Payments may be made by money order, check, direct debit from your checking account, or credit card. Gifts, other purchases, or in-kind payments made directly to the obligee or child(ren) will not fulfill the support obligation. Credit for payments made directly to the obligee or child(ren) may not be given without a court order.
- No payment or installment of an order for child support, or those portions of an order that are allocated for child support, shall be retroactively
  modified by the court except for the period during which the party seeking relief has pending an application for modification as provided
  in N.J.S.A. 2A:17-56.23a. (R: 5:7-4(e)).
- The amount of child support and/or the addition of a health care coverage provision in Title IV-D cases shall be subject to review at least once every three years, on written request by either party to the Division of Family Development, P.O. Box 716, Trenton, NJ 08625-0716, as appropriate, or upon application to the court. (N.J.S.A. 2A: 17-56.9a; R. 5:7-4(e)).
- In accordance with N.J.S.A. 2A:34-23b, the custodial parent may require the non-custodial parent's health care coverage provider to make payments directly to the health care provider by submitting a copy of the relevant sections of the order to the insurer. (R. 5:7-4(e)).
- 7. Social Security numbers are collected and used in accordance with section 205 of the Social Security Act (42 U.S.C. 405). Disclosure of an individual's Social Security number for Title IV-D purposes is mandatory. Social Security numbers are used to obtain income, employment, and benefit information on individuals through computer matching programs with federal and state agencies, and such information is used to establish and enforce child support under Title IV-D of the Social Security Act (42 U.S.C. 651 ef seq.). Any person who willfully and with the intent to deceive, uses a Social Security number obtained on the basis of false information provided to Social Security Administration or provides a false or inaccurate Social Security number is subject to a fine or imprisonment. (42 U.S.C. 408(7); R. 5:7-4(e)).
- The United States Secretary of State is required to refuse to issue or renew a passport to any person certified as owing a child support arrearage exceeding the statutory amount, in addition, the U.S. Secretary of State may take action to revoke, restrict or limit a passport previously issued to an individual owing such a child support arrearage. (42 U.S.C. 652(k)).
- 9. Failure to appear for a hearing to establish or to enforce an order, or failure to comply with the support provisions of this order may result in incarceration. The obligee and obligor shall notify the appropriate Probation Division of any changes in address, employment status, health care coverage, or a change in the address or status of the child(ren). Changes must be reported in writing to the Probation Division within 10 days of the change. Not providing this information is a violation of this Order. The last address you give to Probation will be used to send you notices. If you fail to appear, a default order may be entered against you or a warrant may be issued for your arrest (R. 5:7-4(e)).
- Any payment or installment for child support shall be fully enforceable and entitled to full faith and credit and shall be a judgment by operation of law on and after the date it is due (N.J.S.A. 2A: 17-56.23.a). Any non-payment of child support you owe has the effect of a lien against your property. This child support lien may affect your ability to obtain credit or to sell your property. Failure to remit timely payment automatically results in the entry of a judgment against the obligor and post-judgment interest may be charged. Judgments [also] accrue interest at the rate prescribed by Rule 4:42-11(a). (R. 5:7-4(e), 5:7-5(g)). Before the satisfaction of the child support judgment, any party to whom the child support is owed has the right to request assessment of post-judgment interest on child support judgments.
- 11. All child support obligations are payable by income withholding unless otherwise ordered. If immediate income withholding is not required when an order is entered or modified, the child support provisions of the order may be subject to income withholding when the amount due becomes equal to, or in excess of the amount of support due for 14 days. The withholding is effective against the obligor's current and future income from all sources authorized by law. (R, 5:7-4(e), R, 5:7-5).
- The occupational, recreational, and professional licenses, including a license to practice law, held or applied for by the obligor may be denied, suspended or revoked if: 1) a child support arrearage accumulates that is equal to or exceeds the amount set by statute, or 2) the obligor fails to provide health care coverage for the child as ordered by the court, or 3) a warrant for the obligor's arrest has been issued by the court for obligor's failure to pay child support as ordered, or for obligor's failure to appear at a child support hearing to enforce a child support order and said warrant remains outstanding. (R. 5:7-4(e)).
- 13. The driver's license held or applied for by the obligor may be denied, suspended, or revoked if 1) a child support arrearage accumulates that is equal to or exceeds the amount set by statute, or 2) the obligor fails to provide health care coverage for the child as ordered by the court. The driver's license held or applied for by the obligor shall be denied, suspended, or revoked if the court issues a warrant for the obligor's arrest for failure to pay child support as ordered, or for failure to appear at a hearing to establish paternity or child support, or for failure to appear at a child support hearing to enforce a child support order and said warrant remains outstanding. (R. 5:7-4(e)).
- 14. The name of any delinquent obligor and the amount of overdue child support owed will be reported to consumer credit reporting agencies as a debt owed by the obligor, subject to all procedural due process required under State law. (N.J.S.A. 2A: 17-56.21).
- 15. Child support arrears may be reported to the Internal Revenue Service and the State Division of Taxation. Tax refunds/homestead rebates due the obligor may be taken to pay arrears (N.J.S.A. 2A:17-56.16).
- 16. Child support arrears shall be paid from the net proceeds of any lawsuit, settlement, civil judgment, civil arbitration award, inheritance or workers' compensation award to a prevailing party or beneficiary before any monies are disbursed. (N.J.S.A. 2A:17-56.23b).



- 17. Periodic or tump sum payments from State or local agencies, including lotteries, unemployment compensation, workers' compensation or other benefits, may be seized or intercepted to satisfy child support arrearages. (N.J.S.A. 2A:17-56.53).
- 18. If you owe past due child support, your public or private retirement benefits, and assets held in financial institutions may be attached to satisfy child support arrearages. (N.J.S.A. 2A:17-56.53).
- 19. A person under a child support obligation, who willfully fails to provide support, may be subject to criminal penalties under State and Federal law. Such criminal penalties may include imprisonment and/or fines. (N.J.S.A. 2C:24-5; N.J.S.A. 2C:62-1; 18 U.S.C.A. 22).
- If this order contains any provision concerning custody and/or parenting time, both parties are advised: Failure to comply with the custody
  provisions of this court order may subject you to criminal penalties under N.J.S.A. 2C:13-4, Interference with Custody. Such criminal penalties
  include, but are not limited to, imprisonment, probation, and/or fines.
  - Si esta orden contiene alguna disposición con respecto a la custodia o el horario de las visitas patemas o matemas, se informa a ambas partes que: De no cumplir con las disposiciones de esta orden judicial sobre la custodia, pueden estar sujetas a las penalidades establecidas para esa conducta penal en N.J.S.A. 20:13-4, Interferencia con la Custodia. Tales penalidades incluyen encarcelamiento, libertad a prueba y multas, pero no se limitan a las penas mencionadas.

# SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, FAMILY PART

## ANDERSON VERONICA A **MERCER COUNTY** Plaintiff x Obligee Obligor Docket No. FM-11-000504-11 Probation Account No. CS41834921B DANSBY LAQUAY ORDER FOR RELIEF TO LITIGANT -Defendant Obligee x Obligor **ENFORCEMENT OF LITIGANT'S RIGHTS** With appearance by: **Plaintiff** Attorney for Plaintiff Defendant Attorney for Defendant **IV-D** Attorney **MERCER COUNTY** Probation Division THIS MATTER having come before the Court on the 06 day of SEPTEMBER, 2013; AND the Court having considered the evidence and arguments presented, and having found that: The obligor is under a Court Order to pay \$ 108.00 per WEEKLY for the support of 1 child(ren), \$ 0 per \_\_\_ spousal support and \$ 30.00 per WEEKLY toward arrearages effective 02/04/2008; The obligor has failed to make payments and owes arrearages totaling \$ 15,322.67 as of 09/06/2013 due to the Obligee \_\_ Welfare; The obligor is indigent and: qualifies for court appointed counsel, but none is available; qualifies for court appointed counsel and is appointed; The obligor is not indigent and does not qualify for court appointed counsel; The obligor has the current ability to pay \$ toward the arrearages; The obligor has the financial ability to pay and refuses to do so, and that incarceration of the obligor is necessary to coerce compliance; AND the Court having further found that: Therefore it is hereby ORDERED that: The obligor be incarcerated in the County Jail until the Obligor pays \$ to be applied to said arrears or until further Order of this Court. The Court will review the continuing efficacy of this Order for coercive incarceration no later than two weeks from the date of this Order so long as the above release payment is not paid and the Obligor remains incarcerated.



The obligor be released from custody in this matter;

The support-related bench warrant currently issued in this matter is discharged;

	Payments shall be made by Income Withholding on current and Name of Income source: Address of	n current and future income sources, including: Address of income source:			
	Obligor shall, however, make payments at any time that the full	amount of support and arrears is not withheld.			
	The Obligor shall make support payments of \$ per plus \$ per	oward arrears for a total amount of \$ per .			
X	A lump sum payment of \$ 250.00 must be paid by the obligor by obligor shall issue without further notice.	10/06/2013 or a bench warrant for the arrest of the			
X	Effective <u>09/06/2013</u> future missed payment(s) numbering 2 or m further notice.	ore may result in the issuance of a warrant, without			
		An employment search must be conducted by the obligor. Written records of at least # contacts per week must be presented to the Probation Division. If employed, proof of income and the full name and address of employer must be provided immediately to the Probation Division.			
	The obligor is hereby noticed to appear before this court on at the child support obligation. The <u>MERCER COUNTY</u> Family/ Protother interested parties, if any, in this matter.	in for further review and possible modification of pation Division shall serve notice to the Obligee and			
	The Motor Vehicle Commission, State of New Jersey, shall TAKE I License caused by the non-payment of child support is hereby re the Commission requires a fee for restoration of the license, and license suspension other than non-payment of child support.	moved; the Obligor must take note, however, that			
	It is further ORDERED: A LUMP SUM PAYMENT OF \$250 MUST BE PAID WITHN 60 DAYS OR A BENCH WARRANT SHALL ISSUE WITHOUT FURTHER NOTICE. A LUMP SUM PAYMENT OF \$250 MUST BE PAID WITHN 90 DAYS OR A BENCH WARRANT SHALL ISSUE WITHOUT FURTHER NOTICE.  ** IF ANOTHER BENCH WARRANT IS ISSUED. THE FULL ARREARS BALANCE MUST BE PAID FOR RELEASE; OR, AMOUNT CAN BE REDUCED BY \$500/WEEK UNTIL AMOUNT IS PAID OR BALANCE REACHES \$0.				
	is further ORDERED that all provisions of any prior Orders in this m Il force and effect.	atter, not in conflict with this Order, shall remain in			

<u>09/06/2013</u> Date

Alkello LAWRENCE P DEBELLO, J.S.C.



The Later Office of David Perry Davis 112 West Franklin Ave Pennington NJ 08534 (609) 737-2222 (609) 737-3222 (fax) Attorney ID: 047451996 Attorney for plaintiffs

Andreana Kavadas, Alisha Grabowski, LaQuay Dansby, Paulo Arede, individually and on behalf of all persons similarly situated,

Plaintiffs

vs.

Raymond P. Martinez, in his official capacity as Chief Administrator of the New Jersey Motor Vehicle Commission, and The New Jersey Motor Vehicle Commission,

John Jay Hoffman, Esq., in his official capacity as Acting Attorney General of the State of New Jersey, and The State of New Jersey,

Natasha Johnson, in her official capacity as Director of the Department of Human Services, Division of Family Development, Office of Child Support Services, and Department of Human Services, Division of Family Development, Office of Child Support Services,

Defendants

: SUPERIOR COURT OF NEW JERSEY : CHANCERY DIVISION — FAMILY PART : MERCER COUNTY : DOCKET NO. MER-L-1004-15

Civil Action

STATEMENT OF MATERIAL FACTS PURSUANT TO <u>RULE</u> 4:46-2

- 1. Plaintiffs are child support obligors (Certifications from plaintiffs, exhibits C-F).
  - 2. Plaintiffs are subject to "two week warrant status" orders:
    - A. Certification of Andreana Kavadas and attachment thereto at pages C-1,  $\P$  2 through end of exhibit.
    - B. Certification of Paulo Arede and attachment thereto at page

- D-1, ¶ 2 , D-6 ¶5.
- C. Certification of Alisha Grabowski and attachment thereto at page E-2, E-5  $\P18$ .
- D. Certification of LaQuay Dansby and attachment thereto at page F-2, F-23  $\P$  4.
- 3. Plaintiffs have, for periods of at least two years each, been in arrears that exceed that amount of support due for two weeks.
  - A. Certification of Andreana Kavadas and attachment thereto at pages C-1,  $\P$  2 through end of exhibit.
  - B. Certification of Alisha Grabowski and attachment thereto at pages E-1,  $\P$  2 through end of exhibit.
  - C. Certification of LaQuay Dansby and attachment thereto at pages F-1,  $\P$  2 through end of exhibit.
  - D. Certification of Paulo Arede and attachment thereto at pages D-1,  $\P$  2 through end of exhibit.
- 4. Chief Administrator Martinez is the Director of the New Jersey Motor Vehicle Commission. N.J.S.A. 39:2-2
  - 5. Chief Administrator Martinez is a State Actor. Id.
- 6. Chief Administrator Martinez duties include suspending and reinstating driver's licenses. Id.
- 7. The issuance of a warrant results in the automatic suspension of the obligor's driver's license. N.J.S.A. 2A:17-56.41(3) (a).
- 8. Directive #15-08 does not require that any additional notice be afforded to obligors before a warrant is issued based on a violation of a "two week warrant" order. <u>Directive #15-08</u>.
- 9. Plaintiffs thus remain under threat of having a license suspension imposed "without additional notice."

- 10. Plaintiffs procedural due process and substantive statutory rights pursuant to N.J.S.A. 39:5-30 and 2A:17-56.44 are thus at risk of being violated.
- 11. The issuance of an injunction requiring Chief Administrator Martinez to begin complying with the notice requirements of  $\underline{\text{N.J.S.A.}}$  39:5-30 and 2A:17-56.44 would protect those rights.