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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: Kavadas, et al v. Martinez, et el
Docket No. MER-L-1004-15

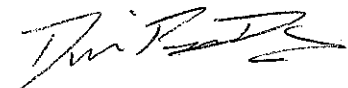
Dear Judge Jacobson:

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 Rule 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 Law 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

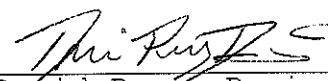
Civil Action

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

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Attorney ID: 047451996
Attorney for plaintiffs

Andreana Kavadas, Alisha : SUPERIOR COURT OF NEW JERSEY
Grabowski, LaQuay Dansby, Paulo : CHANCERY DIVISION — FAMILY PART
Arede, individually and on : MERCER COUNTY
behalf of all persons similarly : DOCKET NO. MER-L-1004-15
situated, :
Plaintiffs : Civil Action

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, :

PROOF OF SERVICE

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

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.

DATED: 8/21/15


Robin Henderson

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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: Kavadas, et al v. Martinez, et el
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. Summary judgment is appropriate when, as here, 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, R. 4:46-2(c); 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, N.J.S.A. 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, 20,381¹ 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. A "license" includes a driver's license and a warrant is an order.

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 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 v. Carter, 2 Kan. 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). See also, <http://thelawdictionary.org/warrant-of-arrest/> (visited 8/9/15) (an arrest warrant is " [a] written order. . . " citing Brown v. State, 109 Ala. 70, 20 So. 103 (1895)); People v. Smith, 926 P.2d 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.² 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

² 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.

³ 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.

⁴ 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 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." 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,

A handwritten signature in dark ink, appearing to read "David Perry Davis", with a horizontal line extending to the right.

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 driver's 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.

| | 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 "**DFD's Response:** The following NJKiDS data. All driver's licenses were suspended as a result

(A)

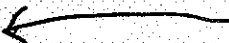
A-1

| | A | B | C | D | E | F | G | H | I | J | K | L |
|----|------|--------|------------------------|-------------|--------------|---|---|---|---|---|---|---|
| 1 | Year | Active | Requirements Satisfied | Inactivated | Total posted | | | | | | | |
| 2 | 2015 | 4,924 | 8,438 | 39 | 13,401 | | | | | | | |
| 3 | 2014 | 7,977 | 37,455 | 202 | 45,634 | | | | | | | |
| 4 | 2013 | 3,273 | 38,534 | 274 | 42,081 | | | | | | | |
| 5 | 2012 | 1,742 | 37,706 | 332 | 39,780 | | | | | | | |
| 6 | 2011 | 1,407 | 32,897 | 364 | 34,668 | | | | | | | |
| 7 | 2010 | 1,165 | 29,814 | 349 | 31,328 | | | | | | | |
| 8 | 2009 | 1,296 | 27,589 | 507 | 29,392 | | | | | | | |
| 9 | 2008 | 1,760 | 30,178 | 781 | 32,719 | | | | | | | |
| 10 | 2007 | 1,643 | 27,640 | 311 | 29,594 | | | | | | | |
| 11 | 2006 | 1,686 | 26,027 | 354 | 28,067 | | | | | | | |
| 12 | 2005 | 2,004 | 23,391 | 349 | 25,744 | | | | | | | |
| 13 | 2004 | 1,742 | 21,909 | 298 | 23,949 | | | | | | | |
| 14 | 2003 | 2,450 | 19,778 | 409 | 22,637 | | | | | | | |
| 15 | 2002 | 2,075 | 18,668 | 340 | 21,083 | | | | | | | |
| 16 | 2001 | 8,103 | 18,356 | 395 | 26,854 | | | | | | | |
| 17 | 2000 | 8,630 | 17,775 | 421 | 26,826 | | | | | | | |
| 18 | 1999 | 8,101 | 11,924 | 511 | 20,536 | | | | | | | |
| 19 | 1998 | 1,372 | 1,002 | 80 | 2,454 | | | | | | | |
| 20 | 1997 | 116 | 79 | 28 | 223 | | | | | | | |
| 21 | 1996 | 1 | 5 | 1 | 7 | | | | | | | |
| 22 | | | | | 496,977 | | | | | | | |
| 23 | | | | | | | | | | | | |
| 24 | | | | | | | | | | | | |
| 25 | | | | | | | | | | | | |
| 26 | | | | | | | | | | | | |
| 27 | | | | | | | | | | | | |
| 28 | | | | | | | | | | | | |
| 29 | | | | | | | | | | | | |

↑ 100005 A-3
or (see A-3)

X-2

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

112 West Franklin Avenue
 Pennington, NJ 08534
 Voice: 609-737-2222
 Fax: 609-737-3222





CHRIS CHRISTIE
Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 116
TRENTON, NJ 08625-0116

JOHN J. HOFFMAN
Acting Attorney General

KIM GUADAGNO
Lt. Governor

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 of Human Services, Division of 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



B

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 "the 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 sur-reply 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. The 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 Pasqua was premised on Fourteenth and Sixth Amendment concerns that "a litigant may lose his physical liberty if he loses the litigation." Pasqua, supra, at 142 (citing Lassiter v. Dep't of Soc. Servs., supra, 452 U.S. 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. Id. at 147. When Pasqua relied upon cases such as Rodriguez, it cannot be concluded here that Pasqua, 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 Rodriguez, but temporary and subject to almost immediate restoration as long as the arrearages are paid. While Pasqua 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 the "substantial 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 a "loss of driving privileges" and a "substantial loss of driving privileges". Neither Court 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"¹ is extremely narrow. In the majority of cases, the issue arises in a 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);

¹ 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 for it. Plaintiffs cannot impose on the public and judiciary a 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

² 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 required 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 Rodriguez, the Supreme Court only intended this "loss of driving privileges" to apply to those cases envisioned by Rodriguez, and those which have since relied on Rodriguez 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 Pasqua 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 a finding does not require 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 to be unconstitutional requires a defendant to make a "plain showing that Congress has exceeded its constitutional bounds"). The 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. Such a finding would be controlling on the New Jersey Judiciary or the Administrative Office of the Courts, neither of which are 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 respond to a subpoena relating to a paternity or child support action or a child support related warrant exists, and the obligor is found to possess a license in the State and all appropriate enforcement methods to collect the child support arrearage have been exhausted... 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 makes 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 Rule 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 Rule 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

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(609) 737-2222
(609) 737-3222 (fax)
Attorney ID: 047451996
Attorney for plaintiff class

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
: MERCER COUNTY
: DOCKET NO. MER-L-1004-15

: 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

C-1

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

C-2

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.

Andreana Kavadas
Andreana Kavadas

DATED: 8/19/15

C3

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: 8/20/2015

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SUPERIOR COURT OF NEW JERSEY:

CHANCERY DIVISION, FAMILY PART

SOMERSET COUNTY

PO BOX 3000

NO. BRIDGE HIGH STREET

SOMERVILLE, NJ 08876-1262

Website: www.njchildsupport.org



(877)655-4371

Fax:

PIETRANGELO DAVID

Plaintiff

vs.

KAVADAS ANDREANA

Defendant

Docket Number FD-18-000123-08

Case ID: CS50434431B

APPLICATION FOR POST-DISPOSITION RELIEF

Plaintiff Address:

246 E CAMPLAIN RD

MANVILLE, NJ 08835-1406 US

Defendant Address:

45 W BROAD ST

APT B

BRIDGETON, NJ 08302-2514 US

☒ **Modification Of Order Dated: 12/23/2008**

☐ **Additional Relief**

☐ **Enforcement Of Order Dated: 12/23/2008**

Relief:

☐ **Parenting Time**

☐ **Custody**

☐ **Paternity**

☐ **Support**

☐ **Increase Support**

☐ **Decrease Support**

☒ **Terminate Support**

☐ **Medical Support**

☐ **Emancipation**

☐ **Relocation**

☒ **Other**

The children are:

Name

PIETRANGELO, PHOENIX

Date of Birth

11/27/1998

Residing with

DAVID PIETRANGELO

A hearing is being requested because:

Ms. Kavadas has filed an application seeking to "consolidate Daniel 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 filed in support of this application please call 1-877-655-4371 *Signature on file

Certification (Rule 1:4-4(B)): I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

MICHELLE HEADLEY

Witness

07/07/2014

Date

☐ **Plaintiff**

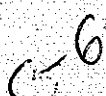
☒ **Defendant / Counterclaimant**

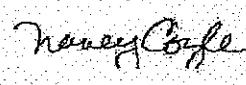


CS558,34348717

355\MICHELLE.HEADLEY\CS50434431B\51411701

C-5



| | | | | | | | |
|---|-------------------------------------|---|--|--|--------------------------|--------------------------------------|--|
| DOCKET# <u>FD-18-000129-08</u> | | CS# <u>CS50434431B</u> | | HEARING DATE <u>08/29/2014</u> | | PAGE <u>2</u> OF <u>2</u> | |
| 13. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | Issues of reimbursement reserved. | | 13B. | <input type="checkbox"/> | Issue of retroactive order reserved. | |
| 14. | <input type="checkbox"/> | 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. Failure to appear may result in a default order, bench warrant, or dismissal. Reason for relist: _____ | | | | | |
| 15. | <input type="checkbox"/> | 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. | | | | | |
| 18. | <input type="checkbox"/> | SERVICE upon which this order is based: Personal Service <input type="checkbox"/> Certified Mail: <input type="checkbox"/> Refused <input type="checkbox"/> Regular Mail (not returned) Date: _____ Signed by: _____ Returned Unclaimed <input type="checkbox"/> Other: _____ | | | | | |
| 17. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | EFFECTIVE _____ FUTURE MISSED PAYMENT(S) numbering: _____ or more may result in the issuance of a warrant, without further notice. | | | | | |
| 19. | <input type="checkbox"/> | A LUMP SUM PAYMENT OF \$ _____ must be made by the obligor by _____, or a bench warrant may be issued without further notice. | | | | | |
| 20. | <input type="checkbox"/> | This complaint / motion is hereby DISMISSED: (reason) _____ | | | | | |
| 21. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | THIS ORDER IS ENTERED BY DEFAULT. The <input type="checkbox"/> obligor <input type="checkbox"/> obligee was properly served to appear for a hearing on _____ and failed to appear. 22A <input type="checkbox"/> Affidavit of Non-Military Service is filed. | | | | | |
| 23. | <input checked="" type="checkbox"/> | It is further ORDERED: <u>DEFENDANT APPEARED BY TELEPHONE FROM BRIDGETON, NJ. HER APPLICATION FOR MODIFICATION OF THE CURRENT ORDER IS DENIED WITHOUT PREJUDICE AS THE CURRENT ORDER OF \$40/WEEK IS MINIMAL. OBLIGOR PROVIDED DOCUMENTATION THAT SHE CURRENTLY RECEIVES FOOD STAMPS, BUT DOES NOT RECEIVE ANY TANF. SHE PROVIDED NO PROOF OF HER EFFORTS TO FIND EMPLOYMENT. PRIOR ORDER OF \$40/WEEK PLUS \$25/WEEK TOWARDS ARREARS IS TO CONTINUE. DEFENDANT TESTIFIED THAT SHE IS SEEKING TO HAVE THE 2 PAYMENT MISSED BENCH WARRANT STATUS LIFTED. HOWEVER, CUMBERLAND COUNTY PROBATION IS ENFORCING THIS ORDER. IF SHE IS REQUESTING THAT THE BENCH WARRANT STATUS BE LIFTED, SHE SHOULD CONTACT THE COUNTY ENFORCING THIS ORDER. NJKIDS HAS ANOTHER ARREARS ONLY ORDER UNDER CS50908824A, FD-05-00-06, IN THE AMOUNT OF \$50/ WEEK FOR THE SAME PLAINTIFF, DAVID PIETRANGELO. SAME DEFENDANT, ANDREANA KAVADAS, AND SAME CHILD, 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 TRANSFERRED TO THIS CASE, CS50434431B, FD-18-123-08.</u> | | | | | |
| 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. | | | | | | | |
| PLAINTIFF ATTORNEY FOR PLAINTIFF 24. <input type="checkbox"/> INTAKE CONFERENCE BY AUTHORIZED COURT STAFF: 25. <input type="checkbox"/> 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 | | | | DEFENDANT ATTORNEY FOR DEFENDANT 26. <input type="checkbox"/> Copies provided at hearing to <input type="checkbox"/> obligee <input type="checkbox"/> obligor. 26A <input type="checkbox"/> Copies to be mailed to <input type="checkbox"/> obligee <input type="checkbox"/> obligor | | | |
| 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 <u>08/29/2014</u> H.O. <u>NANCY COYLE</u> <div style="text-align: right;">  Signature </div> | | | | | | | |
| So Ordered by the Court: | | | | | | | |



CS52635616900
74998704000104030600

Kavadas et al v. Martinez et al

74998704 - 000104 of 002505 - 03 of 06



6-7

SOMERSET COUNTY

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



(877)655-4371

Fax:

PIETRANGELO DAVID

Plaintiff ☒ Obligor ☐ Obligor
vs.

KAVADAS ANDREANA

Defendant ☐ Obligor ☒ 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 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

KERI GNACEK
PROBATION OFFICER



CS022,5927519

351\KERI.GNACEK\CS50434431B\51411701

C-8

CAPE MAY COUNTY

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

GERRY WILLIAM P

Plaintiff ☒ Obligor ☐ Obligor

vs.

KAVADAS ANDREANA

Defendant ☐ Obligor ☒ Obligor

Docket No: FD-05-000097-03

Case ID: CS53367960A

Date: 02/10/2011

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 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.

JOANN THOMPSON
PROBATION OFFICER



CS022,9760131

091JOANN.THOMPSON\CS53367960A\51411701

C-a

CAPE MAY COUNTY

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

GERRY WILLIAM P

Plaintiff ☒ Oblige ☐ Obligor

vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

Docket No: FD-05-000097-03

Case ID: CS53367960A

Date: 07/18/2012

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



CS022,19987212

091JEROME.MANSFIELD\CS53367960A\51411701

C-10

CUMBERLAND COUNTY

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



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

PIETRANGELO DAVID

Plaintiff ☒ Obligor ☐ Oblige
vs.

KAVADAS ANDREANA

Defendant ☐ Obligor ☒ Oblige

Docket No: FD-18-000123-08

Case ID: CS50434431B

Date: 08/01/2012

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 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 (856)453-4600

Thank you for your immediate attention to this matter.

WARREN JOHNSON
INVESTIGATOR



CS022,20262806

111WARREN.JOHNSON\CS50434431B\51411701

C11

CAPE MAY COUNTY

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

PIETRANGELO DANIEL J

Plaintiff ☒ Obligor ☐ Obligor

vs.

KAVADAS ANDREANA

Defendant ☐ Obligor ☒ Obligor

Docket No: **FD-05-000080-05**

Case ID: **CS50908824A**

Date: **08/10/2012**

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 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



CS022,20471944

091\JEROME.MANSFIELD\CS50908824A\51411701

C12

CUMBERLAND COUNTY

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: 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 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

1111WARREN.JOHNSONCS50434431B151411701

C13

CAPE MAY COUNTY

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

PIETRANGELO DANIEL J

Plaintiff ☒ Obligor ☐ Obligor

vs.

KAVADAS ANDREANA

Defendant ☐ Obligor ☒ Obligor

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 05/05/2014

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 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.

Thank you for your immediate attention to this matter.

JEROME MANSFIELD
PROBATION OFFICER



CS022,32928851

091JEROME.MANSFIELD\CS50908824A\51411701

C14

CUMBERLAND COUNTY

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



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

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

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.



CS594,33256781

111/LAWRENCE.KANTROWITZ/CS50434431B/51411701

C15

CUMBERLAND COUNTY

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



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

PIETRANGELO DAVID

Plaintiff ☒ Oblige ☐ Obligor
vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

Docket No: FD-18-000123-08

Case ID: CS50434431B

Date: 06/17/2014

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 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.

Thank you for your immediate attention to this matter.

LAWRENCE KANTROWITZ

BILINGUAL PROBATION OFFICER



CS022,33738935

111\LAWRENCE.KANTROWITZ\CS50434431B\51411701

C16

CUMBERLAND COUNTY

Probation Division, Child Support Enforcement

60 W BROAD ST

BRIDGETON, NJ 08302-2515

Website: www.njchidsupport.org



(877)655-4371

Fax: (856)453-1824

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

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.



CS594,34049934

111LAWRENCE.KANTROWITZ\CS50434431B\51411701

C17

CAPE MAY COUNTY

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

PIETRANGELO DANIEL J

Plaintiff ☒ Oblige ☐ Obligor
vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 07/15/2014

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 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.

Thank you for your immediate attention to this matter.

JEROME MANSFIELD
PROBATION OFFICER



CS022,34280788

091\JEROME.MANSFIELD\CS50908824A\51411701

C18

CAPE MAY COUNTY

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



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

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.



CS594,34594387

091\DAWN.DOUGHERTY\CS50908824A\51411701

C19

CUMBERLAND COUNTY

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



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

PIETRANGELO DAVID

Plaintiff ☒ Oblige ☐ Obligor
vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

Docket No: **FD-18-000123-08**

Case ID: **CS50434431B**

Date: **09/29/2014**

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 06/18/2014.

Your current balance owed is \$ 11,724.00 as 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)655-4371 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 call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter

LAWRENCE KANTROWITZ

BILINGUAL PROBATION OFFICER

C20



CUMBERLAND COUNTY

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



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

PIETRANGELO DAVID

Plaintiff ☒ Oblige ☐ Obligor

vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

Docket No: FD-18-000123-08

Case ID: CS50434431B

Date: 12/08/2014

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 06/18/2014.

Your current balance owed is \$ 12,124.00 as 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)655-4371 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 call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter

LAWRENCE KANTROWITZ
BILINGUAL PROBATION OFFICER

C21



CAPE MAY COUNTY

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

PIETRANGELO DANIEL J

Plaintiff ☒ Oblige ☐ Obligor
vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

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 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.

Thank you for your immediate attention to this matter.

JEROME MANSFIELD
PROBATION OFFICER

C22



CS022,36979643

091\JEROME.MANSFIELD\CS50908824A\51411701

CUMBERLAND COUNTY

Probation Division, Child Support Enforcement

60 W BROAD ST

BRIDGETON, NJ 08302-2515

Website: www.njchildsupport.org



(877)655-4371

Fax: (856)453-1824

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

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 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.



CS594,37127966

111LAWRENCE.KANTROWITZ\CS50434431B\51411701

C23

CAPE MAY COUNTY

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



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

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.

C24



CS594,38636537

091\DAWN.DOUGHERTY\CS50908824A\51411701

CAPE MAY COUNTY

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

PIETRANGELO DANIEL J

Plaintiff ☒ Oblige ☐ Obligor
vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 02/10/2015

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 current balance owed is \$ 6,067.68 as 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)655-4371 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 call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter

JEROME MANSFIELD
PROBATION OFFICER

C25



CS022,39070142

091\JEROME.MANSFIELD\CS50908824A\51411701

CUMBERLAND COUNTY

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



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

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

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.



CS594,40089190

111LAWRENCE.KANTROWITZ\CS50434431B\51411701

C26

CAPE MAY COUNTY

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

PIETRANGELO DANIEL J

Plaintiff ☒ Oblige ☐ Obligor

vs.

KAVADAS ANDREANA

Defendant ☐ Oblige ☒ Obligor

Docket No: FD-05-000080-05

Case ID: CS50908824A

Date: 05/05/2015

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 \$ 150.00, on 03/20/2015.

Your current balance owed is \$ 5,917.68 as 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)655-4371 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 call Customer Service at (877)655-4371.

Thank you for your immediate attention to this matter

JEROME MANSFIELD

PROBATION OFFICER



CS022,40554186

091\JEROME.MANSFIELD\CS50908824A\51411701

C27

E96 0 FPCS

00051 003483

DATE PREPARED 02/12/15



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

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

D.L. NUMBER K0903 04200 62794



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 privilege 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
COURT HOUSE

CITY: CAPE MAY

ST: NJ ZIP: 08210

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 F. Martinez, Chief Administrator

ANDREANA KAVADAS
45 W. BROAD ST. #B
BRIDGETON NJ 08302-2514

D.L. K0903 04200 62794

E96 0 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.

VF/K0903042006279400000000001000015041EDHFP AIDEDH00089150430000005

Kavadas et al v. Martinez et al

C28

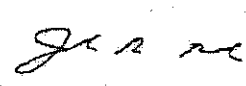
To have your privileges restored at the end of your suspension period, you must pay a \$100.00 restoration fee to the Motor Vehicle Commission. You must also provide the Motor Vehicle Commission with a court order restoring your license or a Probation Division certification attesting to full satisfaction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

C29

| | | | | | |
|---|-----------------|---|-----------|---|----------------------|
| PIETRANGELO DANIEL J PLAINTIFF | | KAVADAS ANDREANA DEFENDANT | | SUPERIOR COURT OF NEW JERSEY Chancery Division-Family Part ORDER | |
| <input type="checkbox"/> Obligor <input checked="" type="checkbox"/> Obligea <input checked="" type="checkbox"/> Obligor <input type="checkbox"/> Obligea | | COUNTY: CAPE MAY COUNTY DOCKET #: FD-05-000080-05 CS#: CS50908824A | | | |
| HEARING DATE 03/18/2015 | | WELFARE / U.I.F.S.A. # | | | |
| With appearance by: <input type="checkbox"/> PL <input type="checkbox"/> Atty for PL <input type="checkbox"/> DEF <input type="checkbox"/> Atty for DEF <input type="checkbox"/> IV-D Atty <input checked="" type="checkbox"/> County Probation Division M TOWN | | | | | |
| This matter having been opened to the court by: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> County Welfare Agency <input checked="" type="checkbox"/> Probation Division <input type="checkbox"/> Family Division for an ORDER for: <input type="checkbox"/> Paternity <input type="checkbox"/> Support <input type="checkbox"/> Visitation <input type="checkbox"/> Custody <input checked="" type="checkbox"/> Enforcement <input type="checkbox"/> Modification / Increase / Decrease | | | | | |
| 1. State with Continuing Exclusive Jurisdiction: NEW JERSEY | | | | | |
| CHILD'S NAME | | BIRTH DATE | | CHILD'S NAME | |
| 2A. PIETRANGELO PHOENIX | | 11/27/1998 | | 2D. | |
| 2B. | | | | 2E. | |
| 2C. | | | | 2F. | |
| 3. <input type="checkbox"/> PATERNITY of child(ren) (# above) _____ is hereby established and an ORDER of paternity is hereby entered. | | | | | |
| 4. <input type="checkbox"/> A Certificate of Parentage has been filed for child(ren) # _____ above. | | | | | |
| 5. <input type="checkbox"/> IT IS HEREBY ORDERED THAT The obligor shall pay support to the New Jersey Family Support Payment Center in the amount of: | | | | | |
| <input type="text"/> + <input type="text"/> + <input type="text"/> = <input type="text"/> | payable | | effective | | <input type="text"/> |
| Child Support | Spousal Support | Arrears Payment | Total | Frequency | Date |
| NOTE: Child support is subject to a biennial cost-of-living adjustment in accordance with R. 5:6B | | | | | |
| 6. <input type="checkbox"/> Child Support Guidelines Order <input type="checkbox"/> Deviation reason: | | | | | |
| 6A. <input type="checkbox"/> Worksheet attached. | | | | | |
| 7. <input type="checkbox"/> Support order shall be administered and enforced by the Probation Division in the county of Venue, CAPE MAY COUNTY County. | | | | | |
| 8. <input type="checkbox"/> ARREARS calculated at establishment hearing are based upon amounts and effective date noted above and total \$ _____ | | | | | |
| 9. <input checked="" type="checkbox"/> ARREARS indicated in the records of the Probation Division, are \$ 6,067.68 as of 03/19/2015 | | | | | |
| 10. <input type="checkbox"/> GROSS WEEKLY INCOMES of the parties, as defined by the Child Support Guidelines, upon which this ORDER is based: OBLIGEE \$ _____ OBLIGOR \$ _____ | | | | | |
| 11. <input type="checkbox"/> INCOME WITHHOLDING 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. <input type="checkbox"/> Medical Support coverage as available at reasonable cost shall be provided for the <input type="checkbox"/> child(ren) <input type="checkbox"/> spouse, by Obligor <input type="checkbox"/> Obligea <input type="checkbox"/> Both <input type="checkbox"/> The parties shall pay unreimbursable health care expenses of the child(ren) which exceed \$250.00 per child per year as follows: % Obligor _____ % Obligea _____ 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: <input type="checkbox"/> Obligea <input type="checkbox"/> Obligor | | | | | |
| 12A. <input type="checkbox"/> Insurance currently provided by a non-party: _____ | | | | | |
| 12B. <input type="checkbox"/> Health insurance benefits are to be paid directly to the health care provider by the insurer. | | | | | |

C30



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|---|-------------------------------------|---|------------------------|---|--------------------------|--------------------------------------|
| DOCKET# | FD-05-000080-05 | CS# | CS50908824A | HEARING DATE | 03/18/2015 | PAGE 2 OF 2 |
| 13. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | Issues of reimbursement reserved. | | 13B. | <input type="checkbox"/> | Issue of retroactive order reserved. |
| 14. | <input type="checkbox"/> | 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. Failure to appear may result in a default order, bench warrant, or dismissal. Reason for relist: _____. | | | | |
| 15. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | SERVICE upon which this order is based: Personal Service <input type="checkbox"/> Certified Mail: <input type="checkbox"/> Refused <input type="checkbox"/> Regular Mail (not returned) Date: _____ <input type="checkbox"/> Signed by: _____ <input type="checkbox"/> Returned Unclaimed <input type="checkbox"/> Other: _____ | | | | |
| 17. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | EFFECTIVE _____ FUTURE MISSED PAYMENT(S) number(s) _____ or more may result in the issuance of a warrant, without further notice. | | | | |
| 19. | <input type="checkbox"/> | A LUMP SUM PAYMENT OF \$ _____ must be made by the obligor by _____, or a bench warrant may be issued without further notice. | | | | |
| 20. | <input type="checkbox"/> | This complaint / motion is hereby DISMISSED: (reason) _____. | | | | |
| 21. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | THIS ORDER IS ENTERED BY DEFAULT. The <input type="checkbox"/> obligor <input type="checkbox"/> obligee was properly served to appear for a hearing on _____ and failed to appear. 22A. <input type="checkbox"/> Affidavit of Non-Military Service is filed. | | | | |
| 23. | <input checked="" type="checkbox"/> | It is further ORDERED: Bench Warrant dated 2/10/15 was executed. \$150 was paid for Obligor's release. Driver's license revoked as a result of a Child Support Bench Warrant is to be reinstated upon payment of the required restoration fee. | | | | |
| 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: | | | | | | |
| PLAINTIFF | | | DEFENDANT | | | |
| ATTORNEY FOR PLAINTIFF | | | ATTORNEY FOR DEFENDANT | | | |
| 24. | <input type="checkbox"/> | INTAKE CONFERENCE BY AUTHORIZED COURT STAFF. | | | | |
| 25. | <input type="checkbox"/> | 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. | | | | |
| | | | obligor | | obligor | |
| 26. | <input type="checkbox"/> | Copies provided at hearing to <input type="checkbox"/> obligee <input type="checkbox"/> obligor 26A. <input checked="" type="checkbox"/> Copies to be mailed to <input checked="" type="checkbox"/> obligee <input checked="" type="checkbox"/> obligor | | | | |
| 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 | | H.O. | | Signature | | |
| So Ordered by the Court: Date 03/19/2015 | | Judge JOHN R RAUH | | | J.S.C. | |
| | | | |  Signature | | |

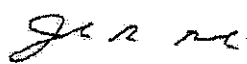
C31



| | | | |
|---|-----------------|---|-------|
| PIETRANGELO DANIEL J PLAINTIFF | | KAVADAS ANDREANA DEFENDANT | |
| <input type="checkbox"/> Obligor <input checked="" type="checkbox"/> Obligea <input checked="" type="checkbox"/> Obligor <input type="checkbox"/> Obligea | | SUPERIOR COURT OF NEW JERSEY Chancery Division-Family Part ORDER | |
| HEARING DATE 04/30/2014 | | WELFARE / U.I.F.S.A. # _____ | |
| COUNTY: CAPE MAY COUNTY DOCKET #: FD-05-000080-05 CS#: CS50908824A | | | |
| With appearance by: <input type="checkbox"/> PL <input type="checkbox"/> Atty for PL <input type="checkbox"/> DEF <input type="checkbox"/> Atty for DEF <input type="checkbox"/> IV-D Atty <input checked="" type="checkbox"/> County Probation Division DOUGHERTY | | | |
| This matter having been opened to the court by: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> County Welfare Agency <input checked="" type="checkbox"/> Probation Division <input type="checkbox"/> Family Division for an ORDER for: <input type="checkbox"/> Paternity <input type="checkbox"/> Support <input type="checkbox"/> Visitation <input type="checkbox"/> Custody <input checked="" type="checkbox"/> Enforcement <input type="checkbox"/> Modification / Increase / Decrease | | | |
| 1. State with Continuing Exclusive Jurisdiction: NEW JERSEY | | | |
| CHILD'S NAME | | BIRTH DATE | |
| 2A. PIETRANGELO PHOENIX | | 11/27/1998 | |
| 2B. | | 2D. | |
| 2C. | | 2E. | |
| | | 2F. | |
| 3. <input type="checkbox"/> PATERNITY of child(ren) (# above) _____ is hereby established and an ORDER of paternity is hereby entered. | | | |
| 4. <input type="checkbox"/> A Certificate of Parentage has been filed for child(ren) # _____ above. | | | |
| 5. <input type="checkbox"/> IT IS HEREBY ORDERED THAT The obligor shall pay support to the New Jersey Family Support Payment Center in the amount of: | | | |
| <input type="text"/> + <input type="text"/> + <input type="text"/> = <input type="text"/> payable <input type="text"/> effective <input type="text"/> | | | |
| Child Support | Spousal Support | Arrears Payment | Total |
| | | Frequency | Date |
| NOTE: Child support is subject to a biennial cost-of-living adjustment in accordance with R. 5:6B | | | |
| 6. <input type="checkbox"/> Child Support Guidelines Order <input type="checkbox"/> Deviation reason: _____ | | | |
| 6A. <input type="checkbox"/> Worksheet attached. | | | |
| 7. <input type="checkbox"/> Support order shall be administered and enforced by the Probation Division in the county of Venue, CAPE MAY COUNTY County. | | | |
| 8. <input type="checkbox"/> ARREARS calculated at establishment hearing are based upon amounts and effective date noted above and total \$ _____ | | | |
| 9. <input checked="" type="checkbox"/> ARREARS indicated in the records of the Probation Division, are \$ 6,147.68 as of 04/30/2014 | | | |
| 10. <input type="checkbox"/> GROSS WEEKLY INCOMES of the parties, as defined by the Child Support Guidelines, upon which this ORDER is based: OBLIGEE \$ _____ OBLIGOR \$ _____ | | | |
| 11. <input type="checkbox"/> INCOME WITHHOLDING 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. <input type="checkbox"/> Medical Support coverage as available at reasonable cost shall be provided for the <input type="checkbox"/> child(ren) <input type="checkbox"/> spouse, by Obligor <input type="checkbox"/> Obligea <input type="checkbox"/> Both <input type="checkbox"/> The parties shall pay unreimbursable health care expenses of the child(ren) which exceed \$250.00 per child per year as follows: _____ % Obligor _____ % Obligea 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: <input type="checkbox"/> Obligea <input type="checkbox"/> Obligor | | | |
| 12A. <input type="checkbox"/> Insurance currently provided by a non-party: _____ | | | |
| 12B. <input type="checkbox"/> Health insurance benefits are to be paid directly to the health care provider by the insurer. | | | |

C32



| | | | | | | |
|---|-------------------------------------|---|-------------|--|--------------------------|--------------------------------------|
| DOCKET# | FD-05-000080-05 | CS# | CS50908824A | HEARING DATE | 04/30/2014 | PAGE 2 OF 2 |
| 13. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | Issues of reimbursement reserved. | | 13B. | <input type="checkbox"/> | Issue of retroactive order reserved. |
| 14. | <input type="checkbox"/> | 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. Failure to appear may result in a default order, bench warrant, or dismissal. Reason for relist: _____. | | | | |
| 15. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | SERVICE upon which this order is based: Personal Service <input type="checkbox"/> Certified Mail: <input type="checkbox"/> Refused <input type="checkbox"/> Regular Mail (not returned) Date: _____ Signed by: _____ Returned Unclaimed <input type="checkbox"/> Other: _____ | | | | |
| 17. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | EFFECTIVE _____ FUTURE MISSED PAYMENT(S) numbering _____ or more may result in the issuance of a warrant, without further notice. | | | | |
| 19. | <input type="checkbox"/> | A LUMP SUM PAYMENT OF \$ _____ must be made by the obligor by _____, or a bench warrant may be issued without further notice. | | | | |
| 20. | <input type="checkbox"/> | This complaint / motion is hereby DISMISSED: (reason) _____. | | | | |
| 21. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | THIS ORDER IS ENTERED BY DEFAULT. The <input type="checkbox"/> obligor <input type="checkbox"/> obligee was properly served to appear for a hearing on _____ and failed to appear. 22A <input type="checkbox"/> Affidavit of Non-Military Service is filed. | | | | |
| 23. | <input checked="" type="checkbox"/> | It is further ORDERED: Obligor appeared at Cumberland County Probation Division for the Amnesty Week Program. The bench warrant dated 9/7/2012 had been recalled. Obligor was not given any conditions for this release. Restore the Obligor's NJ Driver's License. The stipulation that if two payments are missed on this account a bench warrant will issue for the NCP's arrest is still an active remedy on this account. | | | | |
| 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: | | | | | | |
| PLAINTIFF | | DEFENDANT | | | | |
| ATTORNEY FOR PLAINTIFF | | ATTORNEY FOR DEFENDANT | | | | |
| 24. | <input type="checkbox"/> | INTAKE CONFERENCE BY AUTHORIZED COURT STAFF. | | | | |
| 25. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | Copies provided at hearing to <input type="checkbox"/> obligee <input type="checkbox"/> obligor 26A <input checked="" type="checkbox"/> Copies to be mailed to <input checked="" type="checkbox"/> obligee <input checked="" type="checkbox"/> obligor | | | | |
| 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 | | H.O. | | Signature | | |
| So Ordered by the Court: Date 04/30/2014 | | Judge JOHN R RAUH | | J.S.C. | | |
| | | | | Signature  | | |

C33



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

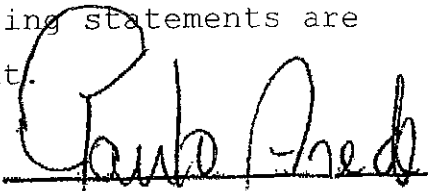
(Exhibit D-6).

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

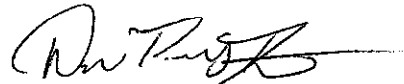
DATED: 8/19/15

D-2

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

FILED

JAN 16 2014

MIRTHA OSPINA
J.S.C.**ORDER PREPARED BY THE COURT**AURORA AREDE,
Plaintiff

v.

PAULO AREDE,
Defendant.SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - FAMILY PART
HUDSON COUNTY
CIVIL ACTIONDOCKET 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. Moreira, 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 testimony 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 earned Three Hundred 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 three (3) years the Defendant has been compliant with taking his medication and that he is not a danger to

"A"

62-31

D-4

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; it 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

¹ The Supreme Court "underscore[d] that '[n]o unpublished opinion shall constitute precedent or be binding upon any court' and that 'no unpublished opinion shall be cited by any court.'" In re Alleged Improper Practice, 194 N.J. 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-TT3 (App. Div. July 10, 2013) (slip. op. at 7-8), which states in pertinent part:

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 Crespo, *supra*, 395 N.J. Super. at 194-95; Burns, *supra*, 367 N.J. Super. at 50. A total suspension of defendant's obligations without an ability-to-earn analysis is inappropriate.

(Emphasis on the original) (Emphasis added).

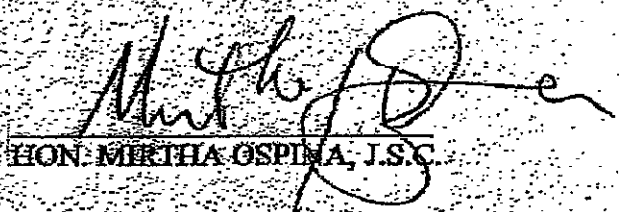
D-5

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.O. 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;

4. **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 arrest²; 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
SET FORTH
ON THE
RECORD**

☒ Opposed
☐ Unopposed
cc: parties


HON. MIRTHA OSPINA, J.S.C.

NOT FOR PUBLICATION OR DISSEMINATION EXCEPT PURSUANT TO COURT RULE

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

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

D-6

DRIVING HISTORY RECORD OF PAULO

AREDE

D.L.NUMBER: A7293 61900 08612

| DATE | EVENT CODE | EVENT DESCRIPTION | STATUS | POINTS |
|------------|------------|-------------------------------------|----------|--------|
| 07/13/2010 | DVR M PAHM | PERSNL APPEAR UNSCHED-WAYNE 46 | ACTIVE | |
| 07/13/2010 | J96 O FPCS | COURT-ORDERED SUS: CHILD SUPPORT | ACTIVE | |
| 07/13/2010 | RES F REST | RESTORATION FEE PAID | ACTIVE | |
| 07/13/2010 | RES R RSTR | RESTORATION OF INDICATED PRIVILEGES | CANCELED | |
| 06/28/2010 | J96 O FPCS | COURT-ORDERED SUS: CHILD SUPPORT | REQ SATS | |
| 11/23/2009 | DVR M PAMV | PERSNL APPEAR UNSCHED-RSC TRENTON | ACTIVE | |
| 11/23/2009 | RES F REST | RESTORATION FEE PAID | ACTIVE | |
| 11/23/2009 | RES R RSTR | RESTORATION OF INDICATED PRIVILEGES | ACTIVE | |
| 10/29/2009 | RES D REST | RESTORATION FEE DUE | REQ SATS | |
| 10/20/2009 | J96 O FPCS | COURT-ORDERED SUS: CHILD SUPPORT | REQ SATS | |
| 09/22/2009 | CIS A POLC | INVOLVED IN ACCIDENT-POLICE REPORT | ACTIVE | |
| 02/05/2009 | DVR M PAMA | PERSNL APPEAR UNSCHED-RSC WAYNE | ACTIVE | |
| 02/05/2009 | RES F REST | RESTORATION FEE PAID | ACTIVE | |
| 02/05/2009 | RES R RSTR | RESTORATION OF INDICATED PRIVILEGES | ACTIVE | |
| 01/02/2009 | B96 O FPCS | COURT-ORDERED SUS: CHILD SUPPORT | REQ SATS | |
| 12/15/2008 | DVR M PAMA | PERSNL APPEAR UNSCHED-RSC WAYNE | ACTIVE | |
| 12/15/2008 | RES F REST | RESTORATION FEE PAID | ACTIVE | |
| 12/15/2008 | RES R RSTR | RESTORATION OF INDICATED PRIVILEGES | ACTIVE | |
| 08/19/2008 | RES D REST | RESTORATION FEE DUE | REQ SATS | |
| 03/20/2008 | J96 O FPCS | COURT-ORDERED SUS: CHILD SUPPORT | REQ SATS | |
| 01/31/2007 | DVR M PAMA | PERSNL APPEAR UNSCHED-RSC WAYNE | ACTIVE | |
| 01/31/2007 | RES F REST | RESTORATION FEE PAID | ACTIVE | |
| 01/31/2007 | RES R RSTR | RESTORATION OF INDICATED PRIVILEGES | ACTIVE | |
| 01/27/2007 | DVR M PAMA | PERSNL APPEAR UNSCHED-RSC WAYNE | ACTIVE | |
| 12/14/2006 | B96 O FPCS | COURT-ORDERED SUS: CHILD SUPPORT | REQ SATS | |
| 09/25/2006 | J96 O FPCS | COURT-ORDERED SUS: CHILD SUPPORT | REQ SATS | |
| 09/13/2006 | DMV M FPQL | HAZMAT FINGERPRINTS QUALIFIED | ACTIVE | |
| 08/30/2006 | DVR M FPCO | HAZMAT FINGERPRINT COMPLIANCE | ACTIVE | |
| 07/30/2006 | DMV M HZFP | HAZMAT ADVISORY FINGERPRINT NOTICE | ACTIVE | |
| 09/27/2005 | DMV M CDLN | CDL NOTIFICATION - MCSIA | ACTIVE | |
| 06/14/2005 | CIS A POLC | INVOLVED IN ACCIDENT-POLICE REPORT | ACTIVE | |
| 01/19/2005 | Y17 V 0339 | IMPROPER DISPLAY/FICTITIOUS PLATES | ACTIVE | |
| 11/27/2001 | DVR M PAMA | PERSNL APPEAR UNSCHED-RSC WAYNE | ACTIVE | |
| 04/29/1994 | DMV Z PC03 | POINT CREDIT-ANNUAL SAFE DRIVING | ACTIVE | -3 |
| 04/29/1993 | G21 V 4123 | IMPROPER RIGHT AND LEFT TURNS | ACTIVE | 3 |
| 03/19/1991 | DMV Z PC03 | POINT CREDIT-ANNUAL SAFE DRIVING | ACTIVE | -3 |
| 08/28/1990 | CIS A POLC | INVOLVED IN ACCIDENT-POLICE REPORT | ACTIVE | |
| 03/19/1990 | G03 V 4124 | IMPROPER TURN MARKED COURSE | ACTIVE | 3 |
| 01/17/1990 | DMV Z PC02 | POINT CREDIT-ANNUAL SAFE DRIVING | ACTIVE | -2 |
| 02/07/1989 | CIS A POLC | INVOLVED IN ACCIDENT-POLICE REPORT | ACTIVE | |

YOU HAVE ACCUMULATED 0 POINT(S)

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
A7293 61900 08612

FIRST NAME
PAULO

M.I. LAST NAME
AREDE

STREET
512 ISLAND RD

CITY
RAMSEY

STATE
NJ

ZIPCODE
07446-1140

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
ATTY

ABSTRACT DATE
03 02 2015

TYPE
K

| EVENT DATE MO. DAY YR. | EVENT RESPONS- BILITY | EVENT TYPE | EVENT IDENTI- FIER | EVENT DESCRIPTION | C M V | H Z M | F T L | P A | PTS. | POSTING DATE MMDDYY |
|---------------------------|-----------------------------|---------------|--------------------------|------------------------------------|-------------|-------------|-------------|--------|------|---------------------------|
| 08 14 14 | RES | R | RSTR | RESTORATION OF INDICATED PRIVILEGE | | | | | | 081414 |
| 08 14 14 | RES | F | LWCC | LICENSE REST FEE PAYMT- WEB/CREDIT | | | | | | 081414 |
| 04 21 14 | J96 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 042214 |
| 08 30 13 | RES | R | RSTR | RESTORATION OF INDICATED PRIVILEGE | | | | | | 083013 |
| 12 09 10 | B96 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 121010 |
| 08 04 10 | J96 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 080510 |
| 07 13 10 | J96 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 071410 |
| 07 13 10 | RES | F | REST | RESTORATION FEE PAID | | | | | | 071310 |
| 06 28 10 | J96 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 062910 |
| 11 23 09 | RES | R | RSTR | RESTORATION OF INDICATED PRIVILEGE | | | | | | 112309 |
| 11 23 09 | RES | F | REST | RESTORATION FEE PAID | | | | | | 112309 |
| 10 20 09 | J96 | O | 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 |
| 02 05 09 | RES | F | REST | RESTORATION FEE PAID | | | | | | 020509 |

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 ABSTRACT DATE.

Kavadas et al v. Martinez et al D-18

D-8

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

CERTIFIED - COMPLETE

DRIVER LICENSE NUMBER
A7293 61900 08612

FIRST NAME
PAULO

M.I. LAST NAME
AREDE

STREET
512 ISLAND RD

CITY
RAMSEY

STATE
NJ

ZIP CODE
07446-1140

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
ATTY

ABSTRACT DATE
03 02 2015

TYPE
K

| EVENT DATE MO. DAY YR. | EVENT RESPON- SIBILITY | EVENT TYPE | EVENT IDENTI- FIER | EVENT DESCRIPTION | C M V | H Z M | F T L | P A | PTS. | POSTING DATE MMDDYY |
|---------------------------|------------------------------|---------------|--------------------------|------------------------------------|-------------|-------------|-------------|--------|------|---------------------------|
| CONTINUED | | | | | | | | | | |
| 01 02 09 | B96 | U | 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 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 032408 |
| 01 31 07 | RES | R | RSTR | RESTORATION OF INDICATED PRIVILEGE | | | | | | 013107 |
| 01 31 07 | RES | F | REST | RESTORATION FEE PAID | | | | | | 013107 |
| 12 14 06 | B96 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 121806 |
| 09 25 06 | J96 | O | FPCS | COURT-ORDERED SUS: CHILD SUPPORT | | | | | | 092706 |
| 06 14 05 | CIS | A | POLC | INVOLVED IN ACCIDENT-POLICE REPORT | | | | | | 101705 |
| 01 19 05 | Y17 | V | 0333 | IMPROPER DISPLAY/FICTITIOUS 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 | POINT CREDIT-ANNUAL SAFE DRIVING | | | | | -3 | 031991 |
| 08 28 90 | CIS | A | POLC | INVOLVED IN ACCIDENT-POLICE REPORT | | | | | | 121098 |

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 ABSTRACT DATE.

Kavadas et al v. Martinez et al

Raymond P. Martinez, Chief Administrator

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

CERTIFIED - COMPLETE

DRIVER LICENSE NUMBER FIRST NAME M.I. LAST NAME
A7293 61900 08612 PAULO AREDE

STREET CITY STATE ZIP CODE
512 ISLAND RD RAMSEY NJ 07446-1140

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 ATTY | | ABSTRACT DATE 03 02 2015 | | TYPE K | | | | | |
|---|-----------------------------|---------------------|--------------------------|------------------------------------|--|-------------|-------------|-------------|--------|------|---------------------------|
| EVENT DATE MO. DAY YR. | EVENT RESPONS- BILITY | EVENT TYPE | EVENT IDENTI- FIER | EVENT DESCRIPTION | | C M V | H Z M | F T L | P A | PTS. | POSTING DATE MMDDYY |
| CONTINUED | | | | | | | | | | | |
| 03 19 90 | G03 | V | 4124 | IMPROPER TURN MARKED COURSE | | | | | | 3 | 121290 |
| 01 17 90 | DMV | Z | PC02 | POINT CREDIT-ANNUAL SAFE DRIVING | | | | | | -2 | 011790 |
| 02 07 89 | CIS | A | POLC | INVOLVED IN ACCIDENT-POLICE REPORT | | | | | | | 122989 |
| 01 17 89 | K84 | V | 0488 | IMPROPER OPER-HWYS W/MARKED LANES | | | | | | 2 | 061489 |
| 01 27 87 | CIS | A | POLC | INVOLVED IN ACCIDENT-POLICE REPORT | | | | | | | 082687 |
| CURRENT STATUS - IN GOOD STANDING | | | | | | | | | | | |
| ***** HISTORY OF SUSPENSIONS ***** | | | | | | | | | | | |
| SUSPENSIONS: SUSPENDED BETWEEN | | | | | | | | | | | |
| 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 LICENSE NUMBER IS LISTED ABOVE. THE RECORD INCLUDES ACCIDENTS, SUSPENSIONS AND CONVICTIONS FOR MOVING VIOLATIONS, AS OF THE ABOVE ABSTRACT DATE.


Raymond F. Martinez, Chief Administrator

D10NW (Rev. 05/10)

COMMERCIAL 2010-06-28 2013-08-30
COMMERCIAL 2014-04-21 2014-08-14
* OUT OF STATE DRIVER HISTORY *

*** NONE ***

Kavadas et al v. Martinez et al D-10

J96 0 FPCS

00051 002969

DATE PREPARED

07/14/10



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
RAMSEY NJ 07446-1140
|||||

D.L. NUMBER A7293 61900 08612

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
ADMIN BLDG
595 NEWARK AVE

CITY: JERSEY CITY ST: NJ ZIP: 07306

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)

WRENT (R 6/10)

Please visit us at www.njmvc.gov

Raymond P. Martinez, Chief Administrator

Detach And Return This Part

PAULO AREDE
512 ISLAND RD
RAMSEY NJ 07446-1140

D.L. A7293 61900 08612

J96 0 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 D-40

VF/A729361971096120000000001000010194EDHFP AIDEDH00042101950000008

J96 0 FPCS

00051 003284

DATE PREPARED

06/30/10



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

RAMSEY

NJ 07446-1140

D.L. NUMBER

A7293 61900 08612

|||||

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

512 ISLAND RD

RAMSEY

NJ 07446-1140

D.L. A7293 61900 08612

J96 0 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 D-12

VF/A729361971096120000000001000010179EDHFPALDEDH00038101810000003

J96 0 FPCS

00051 002924

DATE PREPARED

08/05/10



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

RAMSEY

NJ 07446-1140

D.L. NUMBER

A7293 61900 08612

|||||

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.njmvc.gov

Raymond P. Martinez, Chief Administrator

Detach And Return This Part

PAULO AREDE

512 ISLAND RD

RAMSEY

NJ 07446-1140

D.L. A7293 61900 08612

J96 0 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 D-13

VF/A729361971096120000000001000010216EDHFP AIDEDH00044102170000002

B96 0 FPCS

00051 008592

DATE PREPARED

12/12/10



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

RAMSEY

NJ 07446-1140

D.L. NUMBER

A7293 61900 08612

|||||

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
COURT HOUSE

CITY: HACKENSACK

ST: NJ ZIP: 07601

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

Raymond P. Martinez, Chief Administrator

Detach And Return This Part

PAULO AREDE

512 ISLAND RD

RAMSEY

NJ 07446-1140

D.L. A7293 61900 08612

B96 0 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 D-14

VF/A729361971096120000000001000010343EDHFP AIDEDH00045103460000004

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
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
: MERCER COUNTY
: DOCKET NO. MER-L-1004-15

: 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.

E1

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.


Alisha Grabowski

DATED: 8/19/15

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: 8/20/2015

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25

| | | | | | |
|--|--|--|--|---|--|
| PLAINTIFF Sage Wagner <input type="checkbox"/> Obligor <input checked="" type="checkbox"/> Oblige | | VS DEFENDANT Alisha Wagner <input checked="" type="checkbox"/> Obligor <input type="checkbox"/> Oblige | | SUPERIOR COURT OF NEW JERSEY Chancery Division-Family Part ORDER | |
| HEARING DATE 2-29-08 | | WELFARE / U.I.F.S.A. # | | COUNTY: Mercer | |
| DOCKET # FM-11-182-04 | | CS# 42109729A | | | |
| With appearance by: <input checked="" type="checkbox"/> PL <input checked="" type="checkbox"/> Atty for PL Graziano <input checked="" type="checkbox"/> DEF <input checked="" type="checkbox"/> Atty for DEF Hillman | | | | | |
| <input type="checkbox"/> IV-D Atty <input checked="" type="checkbox"/> County Probation Division | | | | | |
| This matter having been opened to the court by: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> County Welfare Agency <input checked="" type="checkbox"/> Probation Division <input type="checkbox"/> Family Division | | | | | |
| for an ORDER for: <input type="checkbox"/> Paternity <input type="checkbox"/> Support <input type="checkbox"/> Visitation <input type="checkbox"/> Custody <input checked="" type="checkbox"/> Enforcement <input type="checkbox"/> Modification / Increase / Decrease | | | | | |
| 1. State with Continuing Exclusive Jurisdiction: | | | | | |
| CHILD'S NAME | | BIRTH DATE | | CHILD'S NAME | |
| 2A. Sabrina | | 10/12/96 | | 2D. | |
| 2B. Garret | | 7/30/98 | | 2E. | |
| 2C. | | | | 2F. | |
| 3. <input type="checkbox"/> PATERNITY of child(ren) (# above) is hereby established and an ORDER of paternity is hereby entered. | | | | | |
| 4. <input type="checkbox"/> A Certificate of Parentage has been filed for child(ren) # above. | | | | | |
| 5. <input checked="" type="checkbox"/> IT IS HEREBY ORDERED THAT: The obligor shall pay support to the New Jersey Family Support Payment Center in the amount of: | | | | | |

| | | | | | | | |
|---------------|-----------------|-----------------|--------------|---------|-----------------|-----------|-----------------|
| \$207 | X | \$35 | \$242 | payable | per week | effective | continue |
| Child Support | Spousal Support | Arrears Payment | Total | | Frequency | | Date |

NOTE: Child support is subject to a biennial cost of living adjustment in accordance with R. 5:6B

| | |
|---|---------------------------------|
| 6. <input type="checkbox"/> Child Support Guidelines Order <input type="checkbox"/> Deviation reason: | |
| 6A. <input type="checkbox"/> Worksheet attached. | |
| 7. <input type="checkbox"/> Support order shall be administered and enforced by the Probation Division in the county of Venue, _____ County. | |
| 8. <input type="checkbox"/> ARREARS calculated at establishment hearing are based upon amounts and effective date noted above and total \$ _____ | |
| 9. <input checked="" type="checkbox"/> ARREARS indicated in the records of the Probation Division, are \$ 24,925.17 as of 2/28/08 | |
| 10. <input type="checkbox"/> GROSS WEEKLY INCOMES of the parties, as defined by the Child Support Guidelines, upon which this ORDER is based: | |
| OBLIGEE \$ _____ | OBLIGOR \$ _____ |
| 11. <input checked="" type="checkbox"/> INCOME WITHHOLDING 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. <input type="checkbox"/> Medical Support coverage as available at reasonable cost shall be provided for the <input type="checkbox"/> child(ren) <input type="checkbox"/> spouse, by <input type="checkbox"/> Obligor <input type="checkbox"/> Oblige <input type="checkbox"/> Both <input type="checkbox"/> | |
| The parties shall pay unreimbursable health care expenses of the child(ren) which exceed \$250.00 per child per year as follows: | |
| _____ % Obligor _____ % Oblige | |
| 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. cards), as proof of coverage for the child(ren)/spouse shall be provided immediately upon availability to the Probation Division by the: | |
| <input type="checkbox"/> Obligor <input checked="" type="checkbox"/> Oblige 5-10-08 | |
| 12A. <input type="checkbox"/> Insurance currently provided by a non-party: | |
| 12B. <input type="checkbox"/> Health insurance benefits are to be paid directly to the health care provider by the insurer. | |

E4

Wagner v. Wagner

75

DOCKET# FM-11-82-04 CS# 42109 72917 HEARING DATE 2-29-08 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. ☐ 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. Failure 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. ☐ SERVICE upon which this order is based:

Personal Service ☐ Certified Mail: ☐ Refused ☐ Regular Mail (not returned)
Date: ☐ Signed by: ☐ Returned Unclaimed ☐ Other:

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. ☒ EFFECTIVE 2/29/08 FUTURE MISSED PAYMENT(S) numbering 2 or more may result in the issuance of a warrant, without further notice.

19. ☒ A LUMP SUM PAYMENT OF \$ 2500 must be made by the obligor by 2/29/08, or a bench warrant may be issued without further notice. \$ 2500 by 3/3/08 or warrant to issue.

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. ☐ THIS ORDER IS ENTERED BY DEFAULT. The ☐ obligor ☐ obligee was properly served to appear for a hearing on and failed to appear. 22A. ☐ Affidavit of Non-Military Service is filed.

23. ☒ It is further ORDERED: Probation to register case through UIFSA in Pennsylvania if necessary.

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 the Superior Court Judge:

PLAINTIFF [Signature] DEFENDANT [Signature]
ATTORNEY FOR PLAINTIFF [Signature] ATTORNEY FOR DEFENDANT [Signature]

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 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, ARE INCORPORATED INTO THIS ORDER BY REFERENCE AND ARE BINDING ON ALL PARTIES.

So Recommended to the Court by the Hearing Officer:

Date 2-29-08 H.O. Strawder Greff Signature [Signature]

So Ordered by the Court:

Date 3-10-08 Judge [Signature]

Signature [Signature] S.C.

E-5

MERCER COUNTY

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:

WAGNER SAGE D

Plaintiff ☒ Oblige ☐ Obligor

vs.

WAGNER ALISHA M

Defendant ☐ Oblige ☒ Obligor

Docket No: **FM-11-000182-04**

Case ID: **CS42109729A**

Date: **02/12/2013**

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 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**.

Thank you for your immediate attention to this matter.

IJEOMA UMORU
CHILD SUPPORT PROGRAM WORKER



CS022,24214488

211JENIFFER.MULLER\CS42109729A\42109711

E-6



| | | | | | | |
|---------|-----------------|-----|-------------|--------------|------------|-------------|
| DOCKET# | FM-11-000182-04 | CS# | CS42109729A | 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. Failure 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. ☐ SERVICE upon which this order is based:
 Personal Service ☐ Certified Mail: ☐ Refused ☐ Regular Mail (not returned)
 Date: _____ ☐ Signed by: _____ ☐ Returned Unclaimed ☐ Other: _____

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. ☐ EFFECTIVE _____ FUTURE 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.

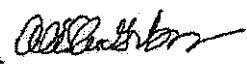
22. ☐ THIS ORDER IS ENTERED BY DEFAULT. The ☐ obligor ☐ obligee was properly served to appear for a hearing on _____ and failed to appear. 22A. ☐ Affidavit of Non-Military Service is filed.

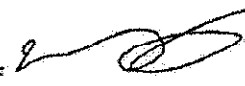
23. ☒ It is further ORDERED: **PROBATION TO INITIATE INCOME WITHOLDING FROM NJ UIB.**

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:

PLAINTIFF _____

DEFENDANT 
 ATTORNEY FOR DEFENDANT

ATTORNEY FOR PLAINTIFF 

24. ☐ INTAKE CONFERENCE BY AUTHORIZED COURT STAFF:

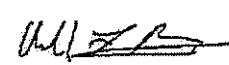
25. ☐ The parties request the termination of all Title IV-D services and consent to direct payment of support. They are advised that all monitoring, collection, enforcement and location services available under Title IV-D of the Social Security Act are no longer in effect. I understand I may reapply for Title IV-D services.

_____ obligee _____ obligor

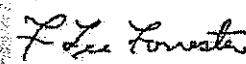
26. ☐ Copies provided at hearing to ☐ obligee ☐ obligor 26A. ☐ Copies to be mailed to ☐ obligee ☐ obligor

TAKE NOTICE THAT THE NEW JERSEY UNIFORM SUPPORT NOTICES WHICH ARE PROVIDED IN APPENDIX XVI OF THE RULES OF COURT, AND WHICH FOLLOW, 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

Signature 

So Ordered by the Court:
 Date 12/31/2013 Judge F LEE FORRESTER J.S.C.

Signature 



CS526,30077959

E8

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:

1. You must continue to make all payments until the court order is changed by another court order.
2. 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 718, Trenton, NJ 08625-0718, 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.
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).
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 hearing to establish paternity or child support, 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).



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EA

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).
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. 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 paternas o maternas, 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.



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 offered 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

F-2

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.

La'Quay Dansby

LaQuay Dansby

DATED: 8/19/15

F-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: 8/20/2015

new jersey motor vehicle commission

ACA1/AB
ACAML06MOTOR VEHICLE SERVICES
DRIVER HISTORY ABSTRACT / 5 YEAR DISPLAY
D.L. NO: D0471 44173 0471208/07/2015 16:10
TL300027

NAME: LAQUAY L DANSBY

ADDRESS: 108 CARDINAL ROAD

EGG HRBR TWP NJ 08234-1604

ENDORSEMENTS:

RESTRICTIONS:

LIC EXP DT: 12/31/2018

VEH CLASS: D

BOAT CLASS:

S C H F

T M Z T

A V M L PTS POSTED

| EVENT DT | EVENT CD | EVENT DESCRIPTION | | |
|----------|----------|---|----|--------|
| 07 10 15 | RES F | WCC LICENSE REST FEE PAYMT- WEB/CREDIT | AC | 071015 |
| 07 10 15 | RES R | RSTR RESTORATION OF INDICATED PRIVILEGE | AC | 071115 |
| 03 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 | WCC LICENSE REST FEE PAYMT- WEB/CREDIT | AC | 122214 |
| 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 | 092513 |
| 08 04 13 | ISS O | ISNP NON PAYMENT OF INSURANCE SURCHARGE | RS | 080413 |
| 11 29 12 | L96 O | FPCS COURT-ORDERED SUS: CHILD SUPPORT | RS | 113012 |

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new jersey motor vehicle commission

ACA1/AB
ACAML06MOTOR VEHICLE SERVICES
DRIVER HISTORY ABSTRACT / 5 YEAR DISPLAY08/07/2015 16:11
TL300027

D.L. NO: D0471 44173 04712

NAME: LAQUAY L DANSBY
ADDRESS: 108 CARDINAL ROAD

EGG HRBR TWP NJ 08234-1604

LIC EXP DT: 12/31/2018

VEH CLASS: D

ENDORSEMENTS:

RESTRICTIONS:

BOAT CLASS:

S C H F

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A V M L PTS POSTED

| EVENT DT | EVENT CD | EVENT DESCRIPTION | | PTS POSTED |
|----------|----------|---|----|------------|
| 09 15 12 | Q10 O | FCIO FAIL TO COMPLY COURT INSTALL ORDER | RS | 091712 |
| 09 12 12 | M06 O | FCIO FAIL TO COMPLY COURT INSTALL ORDER | RS | 091212 |
| 08 05 12 | ISS O | ISNP NON PAYMENT OF INSURANCE SURCHARGE | RS | 080512 |
| 04 23 12 | RES R | RSTR RESTORATION OF INDICATED PRIVILEGE | AC | 042412 |
| 03 10 12 | RES F | LWCC LICENSE REST FEE PAYMT- WEB/CREDIT | AC | 031012 |
| 02 23 12 | M06 V | 0485 IMPROPER PASSING | AC | 4 050212 |
| 02 23 12 | M06 V | 0310 UNLICENSED DRIVER | AC | 050212 |
| 06 07 11 | A03 O | FCIO FAIL TO COMPLY COURT INSTALL ORDER | RS | 062111 |
| 06 03 11 | Q10 O | FSFA FAILURE TO APPEAR | RS | 061811 |

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new jersey motor vehicle commission

ACA1/AB
ACAML06MOTOR VEHICLE SERVICES
DRIVER HISTORY ABSTRACT / 5 YEAR DISPLAY08/07/2015 16:11
TL300027

D.L. NO: D0471 44173 04712

NAME: LAQUAY L DANSBY
ADDRESS: 108 CARDINAL ROAD

EGG HRBR TWP NJ 08234-1604

ENDORSEMENTS:

RESTRICTIONS:

LIC EXP DT: 12/31/2018
VEH CLASS: D
BOAT CLASS:S C H F
T M Z T

A V M L PTS POSTED

| EVENT DT | EVENT CD | EVENT DESCRIPTION | | |
|----------|----------|---|----|--------|
| 05 08 11 | ISS O | ISNP NON PAYMENT OF INSURANCE SURCHARGE | RS | 050811 |
| 04 08 11 | A13 O | FCIO FAIL TO COMPLY COURT INSTALL ORDER | RS | 040811 |
| 04 04 11 | Q10 S | FSFA FAILURE TO APPEAR | FC | 040411 |
| 01 28 11 | L96 O | FPCS COURT-ORDERED SUS: CHILD SUPPORT | RS | 013111 |
| 01 19 11 | RES F | RECC RESTORE FEE PAID CREDIT CARD | AC | 011911 |
| 01 19 11 | RES R | RSTR RESTORATION OF INDICATED PRIVILEGE | AC | 012011 |
| 01 18 11 | Q10 V | 0310 UNLICENSED DRIVER | AC | 042012 |
| 01 02 11 | ISS O | ISNP NON PAYMENT OF INSURANCE SURCHARGE | RS | 010211 |
| 11 17 10 | RES R | RSTR RESTORATION OF INDICATED PRIVILEGE | AC | 111710 |

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new jersey motor vehicle commission

ACA1/AB
ACAML06MOTOR VEHICLE SERVICES
DRIVER HISTORY ABSTRACT / 5 YEAR DISPLAY08/07/2015 16:11
TL300027D.L. NO: D0471 44173 04712NAME: LAQUAY L DANSBY
ADDRESS: 108 CARDINAL ROAD

EGG HRBR TWP NJ 08234-1604

ENDORSEMENTS:

RESTRICTIONS:

LIC EXP DT: 12/31/2018

VEH CLASS: D

BOAT CLASS:

S C H F

T M Z T

A V M L PTS POSTED

EVENT DT EVENT CD

EVENT DESCRIPTION

RS 100510

10 04 10 L96 O FPCS COURT-ORDERED SUS: CHILD SUPPORT

AC 092810

09 28 10 RES R RSTR RESTORATION OF INDICATED PRIVILEGE

AC 091810

09 17 10 RES F RECC RESTORE FEE PAID CREDIT CARD

STATUS PRIVILEGES IN GOOD STANDING

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

SUSPENSIONS

SUSPENDED BETWEEN

BASIC DRIVING

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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MERCER COUNTY

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:

ANDERSON VERONICA A

Plaintiff ☒ Obligor ☐ Oblige
vs.

DANSBY LAQUAY

Defendant ☐ Obligor ☒ Oblige

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**,

TRENTON, 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.**

ANDERSON VERONICA A

Plaintiff ☒ Obligor ☐ Oblige

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 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.

Your account is in arrears of **\$ 2,058.67** as of **07/21/2009**.

DOMBA MUAMBA

SENIOR PROBATION OFFICER

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 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.

Kavadas et al v. Martinez et al F-9

CS022.515006-211DOMBA MUAMBAIC541834921BIC08699601141843170

MERCER COUNTY

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:

To: **LAQUAY DANSBY**

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

MERCER COUNTY

Probation Division, Child Support Enforcement

Dear **LAQUAY DANSBY**,

P.O. BOX 8068

TRENTON, NJ 08608-2406

Website: www.njchildsupport.org

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.

Dear **LAQUAY DANSBY**,

P.O. BOX 8068

TRENTON, NJ 08608-2406

Website: www.njchildsupport.org

Sincerely,

DOMBA MUAMBA

Probation Child Support Enforcement Worker

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.

Dear **LAQUAY DANSBY**,

P.O. BOX 8068

TRENTON, NJ 08608-2406

Website: www.njchildsupport.org

Website: www.njchildsupport.org

Website: www.njchildsupport.org

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Website: www.njchildsupport.org

Website: www.njchildsupport.org

Kavadas et al v. Martinez et al F-10

211\DOMBA.MUAMBA\CS41834921B\41843170

CS594,792422

MERCER COUNTY

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:

ANDERSON VERONICA A

Plaintiff: ☒ Obligea ☐ Obligor

VS.

DANSBY LAQUAY

Defendant: ☐ Obligea ☒ Obligor

Docket No: **FV-11-000797-08**

Case ID: **CS41834921B**

Date: **09/21/2009**

NOTICE OF DELINQUENCY

LAQUAY DANSBY

108 CARDINAL RD

EGG HARBOR TWP, NJ 08234-1604

Probation Division, Child Support Enforcement

Dear LAQUAY DANSBY,

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**.

ANDERSON VERONICA A

Plaintiff: ☒ Obligea ☐ Obligor

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

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**.

Thank you for your immediate attention to this matter.

Your account is in arrears of **\$ 2,148.67**.

DOMBA MUAMBA

SENIOR PROBATION OFFICER

measures to satisfy any outstanding

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.

denial of passports, or arrest and/or incarceration.

DANSBY LAQUAY

Kavadas et al v. Martinez et al F-11

CS022-1169857

211DOMBA MUAMBAICS41834921B41843170

MERCER COUNTY

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

MERCER COUNTY

Probation Division, Child Support Enforcement

Dear **LAQUAY DANSBY**,

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org



(877)655-4371

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 (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

Dear **LAQUAY DANSBY**,

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

Sincerely,

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

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

DOMBA MUAMBA
Probation Child Support Enforcement Worker

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.

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

Dear **LAQUAY DANSBY**,

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

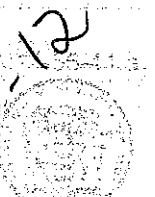
Sincerely,

DOMBA MUAMBA
Probation Child Support Enforcement Worker

An order was previously entered placing you on strict probation status, whereby if you fail to comply with the terms defined

Kavadas et al v. Martinez et al F-12

211DOMBA.MUAMBAICS41834921B41843170



MERCER COUNTY

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 TOWNSHIP, NJ 08234-1604

Date: **07/24/2012**

Case ID: **CS41834921B**

Docket Number: **FV-11-000797-08**

NOTICE OF INTENT OF BENCH WARRANT

MERCER COUNTY

Probation Division, Child Support Enforcement

Dear **LAQUAY DANSBY**,

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

(877)655-4371

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.

LAQUAY DANSBY

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

(877)655-4371

Sincerely,

YAJAIRA JIMENEZ

Probation Child Support Enforcement Worker

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.

LAQUAY DANSBY

P.O. BOX 8068

CS594,20093964

Kavadas et al v. Martinez et al F-13

211/YAJAIRA.JIMENEZ/CS41834921B/41843170

MERCER COUNTY

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 TOWNSHIP, NJ 08234-1604

Date: 10/26/2012

Case ID: CS41834921B

Docket Number: FV-11-000797-08

NOTICE OF INTENT OF BENCH WARRANT

MERCER COUNTY

Probation Division, Child Support Enforcement

Dear LAQUAY DANSBY,

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org



(877)655-4371

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.

LAQUAY DANSBY,

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

Sincerely,

YAJAIRA JIMENEZ

Probation Child Support Enforcement Worker

To: LAQUAY DANSBY

108 CARDINAL RD

EGG HARBOR TOWNSHIP, NJ 08234-1604

copy to your investigator, also with 10 business days

Failure to comply with this notice will result in the issuance of a bench warrant.

MERCER COUNTY

Probation Division, Child Support Enforcement

LAQUAY DANSBY

P.O. BOX 8068

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

copy to your investigator, also with 10 business days

Kavadas et al v. Martinez et al F-14

211YAJAIRA.JIMENEZ\CS41834921B\41843170

(877)655-4371

MERCER COUNTY

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**

Case ID: **CS41834921B**

Date: **05/01/2013**

ANDERSON VERONICA A

Plaintiff ☒ Obligor ☐ Obligor
vs.

DANSBY LAQUAY

Defendant ☐ Obligor ☒ Obligor

NOTICE OF DELINQUENCY

LAQUAY DANSBY

108 CARDINAL RD

EGG HARBOR TOWNSHIP, NJ 08234-1604

Dear **LAQUAY DANSBY**,

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 was \$ 140.00 on 09/05/2012.**

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

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 **(877)655-4371** 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 call Customer Service at **(877)655-4371**.

Thank you for your immediate attention to this matter.

JASBIR SINGH

BILINGUAL PROBATION OFFICER

CS022,25679644

Kavadas et al v. Martinez et al F-15

211\KRISTEN.CUNNINGHAM\CS41834921B\41843170

MERCER COUNTY

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
511 E GIBBSBORO RD
#3312
LINDENWOLD, NJ 08021

Date: 09/20/2013
Case ID: CS41834921B
Docket Number: FM-11-000504-11

MERCER COUNTY

NOTICE OF INTENT OF BENCH WARRANT

Probation Division, Child Support Enforcement
175 S BROAD ST

Dear LAQUAY DANSBY,

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org



(877)655-4371

Fax:

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: LAQUAY DANSBY

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.

Dear LAQUAY DANSBY,

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

(877)655-4371

Fax:

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: LAQUAY DANSBY

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.

LINDENWOLD, NJ 08021

copy to your investigator, also with 10 business days.

copy to your investigator, also with 10 business days.

copy to your investigator, also with 10 business days.

copy to your investigator, also with 10 business days.

copy to your investigator, also with 10 business days.

copy to your investigator, also with 10 business days.

copy to your investigator, also with 10 business days.

Kavadas et al v. Martinez et al F-16

211WASBIR.SINGHCS41834921B41843170

CS594,28342009

MERCER COUNTY

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:

ANDERSON VERONICA A

Plaintiff ☒ Oblige ☐ Obligor
vs.

DANSBY LAQUAY

Defendant ☐ Oblige ☒ Obligor

Docket No: **FM-11-000504-11**

Case ID: **CS41834921B**

Date: **02/24/2014**

NOTICE OF DELINQUENCY

LAQUAY DANSBY

511 E GIBBSBORO RD

#3312

LINDENWOLD, NJ 08021

P.O. BOX 8068

Dear **LAQUAY DANSBY**,

Website: www.njchildsupport.org

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.**

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

Defendant ☐ Oblige ☒ Obligor

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.njchildsupport.org.

LAQUAY DANSBY

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.

JASBIR SINGH

BILINGUAL PROBATION OFFICER

NOTICE OF DELINQUENCY
The Child Support Hotline at (877)655-4371 or via the Internet www.njchildsupport.org

LAQUAY DANSBY

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.

CS022,31577062

Kavadas et al v. Martinez et al F-17

211JASBIR.SINGH/CS41834921B/41843170

MERCER COUNTY

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

511 E GIBBSBORO RD

#3312

LINDENWOLD, NJ 08021

Date: 02/27/2014

Case ID: CS41834921B

Docket Number: FM-11-000504-11

MERCER COUNTY

NOTICE OF INTENT OF BENCH WARRANT

Probation Division, Child Support Enforcement

175 S BROAD ST

Dear LAQUAY DANSBY,

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

(877)655-4371

Fax:

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: LAQUAY DANSBY

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.

Dear LAQUAY DANSBY,

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

(877)655-4371

Fax:

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: LAQUAY DANSBY

511 E GIBBSBORO RD

#3312

LINDENWOLD, NJ 08021

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.

Dear LAQUAY DANSBY,

TRENTON, NJ 08650-0068

Website: www.njchildsupport.org

(877)655-4371

Fax:

Kavadas et al v. Martinez et al F-18

211WASBIR.SINGHCS41834921B41843170

MERCER COUNTY

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:

ANDERSON VERONICA A

Plaintiff ☒ Obligea ☐ Obligor
vs.

DANSBY LAQUAY

Defendant ☐ Obligea ☒ Obligor

Docket No: **FM-11-000504-11**

Case ID: **CS41834921B**

Date: **09/12/2014**

NOTICE OF DELINQUENCY

LAQUAY DANSBY

511 E GIBBSBORO RD

#3312

Probation Division, Child Support Enforcement
LINDENWOLD, NJ 08021

P.O. BOX 8068

Dear **LAQUAY DANSBY**:

Website: www.njchildsupport.org

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**.

Defendant ☐ Obligea ☐ Obligor

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.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**.

Thank you for your immediate attention to this matter.

YANETLIZA GARCIA

INVESTIGATOR

Measures to satisfy any outstanding
the Child Support Hotline at (877)655-4371

LAQUAY DANSBY

511 E GIBBSBORO RD

Probation Division, Child Support Enforcement
LINDENWOLD, NJ 08021



CS022,35358287

Kavadas et al v. Martinez et al F-19

211\YANETLIZA.GARCIA\CS41834921B\41843170

MERCER COUNTY

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:

To: LAQUAY DANSBY

108 CARNIAL RD

EGG HARBOR TW, NJ 08232

Date: 02/03/2015

Case ID: CS41834921B

Docket Number: FM-11-000504-11

NOTICE OF INTENT OF BENCH WARRANT

MERCER COUNTY

Probation Division, Child Support Enforcement

Dear LAQUAY DANSBY,

P.O. BOX 8068

TRENTON, NJ 08608-2406

Website: www.njchildsupport.org



(877)655-4371

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 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

Dear LAQUAY DANSBY,

P.O. BOX 8068

TRENTON, NJ 08608-2406

Website: www.njchildsupport.org

(877)655-4371

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 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.

MERCER COUNTY

Probation Division, Child Support Enforcement

Dear LAQUAY DANSBY,

P.O. BOX 8068

TRENTON, NJ 08608-2406

Website: www.njchildsupport.org



(877)655-4371

Kavadas et al v. Martinez et al F-20

211LASHAWN.JOHNSONCS41834921B41843170

MERCER COUNTY

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:

ANDERSON VERONICA A

Plaintiff ☒ Obligor ☐ Obligor

vs.

DANSBY LAQUAY

Defendant ☐ Obligor ☒ Obligor

Docket No: **FM-11-000504-11**

Case ID: **CS41834921B**

Date: **06/09/2015**

NOTICE OF DELINQUENCY

LAQUAY DANSBY

325 GRAND ST
PATERSON, NJ 07505-2015

Dear **LAQUAY DANSBY**,

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 05/19/2015.**

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

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 **(877)655-4371** 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 call Customer Service at **(877)655-4371**.

Thank you for your immediate attention to this matter.

LASHAWN JOHNSON

CHILD SUPPORT PROGRAM WORKER

For more information, please call (877)655-4371.

CS022,41141653

Kavadas et al v. Martinez et al F-21

211/LASHAWN.JOHNSON/CS41834921B/41843170

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART

ANDERSON VERONICA A

Plaintiff ☒ Obligea ☐ Obligor

vs.

DANSBY LAQUAY

Defendant ☐ Obligea ☒ Obligor

MERCER COUNTY

Docket No. FV-11-000797-08

Probation Account No. CS41834921B

ORDER FOR RELIEF TO LITIGANT -
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 _____ for 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 Obligea and/or _____ 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;



CS702,6771350

Kayden E. Brown, Esq. 02/15/11 170 F-22

- ☐ Payments shall be made by Income Withholding 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.

- ☐ The Obligor shall make support payments of \$ per plus \$ per toward arrears for a total amount of \$ per .
- ☐ A lump sum payment of \$ must be paid by the obligor by or a bench warrant for the arrest of the obligor shall issue without further notice.
- ☒ Effective 09/13/2010 future missed payment(s) numbering 2 or more may result in the issuance of a warrant, without further notice.
- ☐ 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 in for further review and possible modification of the child support obligation. The MERCER COUNTY Family/ Probation Division shall serve notice to the Obligee and other interested parties, if any, in this matter.
- ☒ 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.
- ☒ It is further ORDERED:
obligor advised of his right to file

It is further ORDERED that all provisions of any prior Orders in this matter, not in conflict with this Order, shall remain in full force and effect.

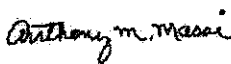
09/13/2010
Date


LAWRENCE P DEBELLO, J.S.C.



CS702,6771350

Ka2101 JENNIFER BROWN NO 341834921 EM1843170 F-23

| DOCKET# | FV-11-000797-08 | CS# | CS41834921B | HEARING DATE | 10/01/2010 | PAGE 2 OF 2 |
|---|-------------------------------------|---|------------------------|--|------------|-------------|
| 13. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | Issues of reimbursement reserved. 13B. <input type="checkbox"/> Issue of retroactive order reserved. | | | | |
| 14. | <input type="checkbox"/> | 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. Failure to appear may result in a default order, bench warrant, or dismissal. Reason for relist: _____. | | | | |
| 15. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | SERVICE upon which this order is based: Personal Service <input type="checkbox"/> Certified Mail: <input type="checkbox"/> Refused <input type="checkbox"/> Regular Mail (not returned) Date: _____ Signed by: _____ Returned Unclaimed <input type="checkbox"/> Other: _____ | | | | |
| 17. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | EFFECTIVE _____ FUTURE MISSED PAYMENT(S) numbering _____ or more may result in the issuance of a warrant, without further notice. | | | | |
| 19. | <input type="checkbox"/> | A LUMP SUM PAYMENT OF \$ _____ must be made by the obligor by _____, or a bench warrant may be issued without further notice. | | | | |
| 20. | <input type="checkbox"/> | This complaint / motion is hereby DISMISSED: (reason) _____ | | | | |
| 21. | <input type="checkbox"/> | 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. | <input type="checkbox"/> | THIS ORDER IS ENTERED BY DEFAULT. The <input type="checkbox"/> obligor <input type="checkbox"/> obligee was properly served to appear for a hearing on _____ and failed to appear. 22A. <input type="checkbox"/> Affidavit of Non-Military Service is filed. | | | | |
| 23. | <input checked="" type="checkbox"/> | It is further ORDERED: The parties are referred to Dr. Joe Cooper at 860 Lower Ferry Rd. Ewing, NJ 08628 for parenting time evaluations. The cost of said evaluations shall be incurred by the Court. All parenting time is hereby suspended until the evaluations are complete. The parties are to contact Dr. Joe Cooper at (215) 208-4194. | | | | |
| 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: | | | | | | |
| PLAINTIFF | | | DEFENDANT | | | |
| ATTORNEY FOR PLAINTIFF | | | ATTORNEY FOR DEFENDANT | | | |
| 24. | <input type="checkbox"/> | INTAKE CONFERENCE BY AUTHORIZED COURT STAFF: | | | | |
| 25. | <input type="checkbox"/> | 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. | | | | |
| <div style="display: flex; justify-content: space-between;"> obligee obligor </div> | | | | | | |
| 26. | <input checked="" type="checkbox"/> | Copies provided at hearing to <input checked="" type="checkbox"/> obligee <input checked="" type="checkbox"/> obligor 26A. <input checked="" type="checkbox"/> Copies to be mailed to <input checked="" type="checkbox"/> obligee <input checked="" type="checkbox"/> obligor | | | | |
| 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 | | H.O. | | Signature | | |
| So Ordered by the Court: | | Judge MASSI ANTHONY | | J.S.C. | | |
| Date 10/01/2010 | | | |  | | |
| | | | | Signature | | |



CS526,7078949

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:

1. You must continue to make all payments until the court order is changed by another court order.
2. 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.
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).
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 hearing to establish paternity or child support, 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 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. 2C: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 cláusulas de custodia de esta orden del tribunal, puede estar sujeto (sujeta) a castigos criminales conforme a N.J.S.A. 2C:13-4, **Interference with Custody, (Obstrucción de la Custodia)**. Dichos castigos criminales incluyen pero no se limitan a encarcelamiento, libertad, multas o una combinación de los tres.





| | | | | | | |
|---------|-----------------|-----|-------------|--------------|------------|-------------|
| DOCKET# | EV-11-000797-08 | CS# | CS41834921B | HEARING DATE | 10/02/2012 | 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. Failure 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. ☒ SERVICE upon which this order is based:
 Personal Service ☐ Certified Mail: ☐ Refused ☒ Regular Mail (not returned)
 Date: _____ Signed by: _____ Returned Unclaimed ☐ Other: _____

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. ☒ EFFECTIVE 10/02/2012 FUTURE MISSED PAYMENT(S) numbering 2 _____ or more may result in the issuance of a warrant, without further notice.

19. ☒ A LUMP SUM PAYMENT OF \$ 1,000.00 _____ must be made by the obligor by 11/15/2012, or a bench warrant may be issued without further notice.

20. ☐ This complaint / motion is hereby DISMISSED: (reason) _____.

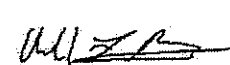
21. ☐ Order of Support is hereby TERMINATED effective _____, as _____. Arrears accrued prior to effective date, if any, shall be paid at the rate and frequency noted on page number one of this ORDER.

22. ☒ THIS ORDER IS ENTERED BY DEFAULT. The ☒ obligor ☐ obligee was properly served to appear for a hearing on 10/02/2012 and failed to appear. 22A ☐ Affidavit of Non-Military Service is filed.


23. ☐ It is further ORDERED: _____.

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:

| | |
|---|---|
| PLAINTIFF ATTORNEY FOR PLAINTIFF 24. <input type="checkbox"/> INTAKE CONFERENCE BY AUTHORIZED COURT STAFF: 25. <input type="checkbox"/> 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 | DEFENDANT ATTORNEY FOR DEFENDANT 26. <input type="checkbox"/> Copies provided at hearing to <input type="checkbox"/> obligee <input type="checkbox"/> obligor 26A <input type="checkbox"/> Copies to be mailed to <input type="checkbox"/> obligee <input type="checkbox"/> obligor 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 10/02/2012 H.O. MICHAEL BARRY <div style="text-align: right;">  Signature </div> |
|---|---|

So Ordered by the Court:
 Date 10/09/2012 Judge PETER WARSHAW J.S.C.


 Signature



CS526,21535180

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:

1. You must continue to make all payments until the court order is changed by another court order.
2. 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.
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).
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 hearing to establish paternity or child support, 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).



CS526,21535180

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).
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. 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 paternas o maternas, 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.



SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART

ANDERSON VERONICA A

Plaintiff ☒ Obligees ☐ Obligor

vs.

DANSBY LAQUAY

Defendant ☐ Obligees ☒ Obligor

MERCER COUNTY

Docket No. FM-11-000504-11

Probation Account No. CS41834921B

ORDER FOR RELIEF TO LITIGANT -
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 _____ for 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 Obligees and/or _____ 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;



CS702,28103956

SANDRA CUNNINGHAM CS41834921B/41843170 F-31

- ☐ Payments shall be made by Income Withholding 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.

- ☐ The Obligor shall make support payments of \$ per plus \$ per toward arrears for a total amount of \$ per .
- ☒ A lump sum payment of \$ **250.00** must be paid by the obligor by **10/06/2013** or a bench warrant for the arrest of the obligor shall issue without further notice.
- ☒ Effective **09/06/2013** future missed payment(s) numbering **2** or more may result in the issuance of a warrant, without further notice.
- ☐ 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 in for further review and possible modification of the child support obligation. The **MERCER COUNTY** Family/ Probation Division shall serve notice to the Obligee and other interested parties, if any, in this matter.
- ☒ 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.
- ☒ 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.

It is further ORDERED that all provisions of any prior Orders in this matter, not in conflict with this Order, shall remain in full force and effect.

09/06/2013
Date


LAWRENCE P DEBELLO, J.S.C.



CS702,28103856

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Kavadas et al v. Martinez et al F-32

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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 RULE 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, ¶ 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 ¶18.

D. Certification of LaQuay Dansby and attachment thereto at page F-2, F-23 ¶ 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 Kavaqas and attachment thereto at pages C-1, ¶ 2 through end of exhibit.

B. Certification of Alisha Grabowski and attachment thereto at pages E-1, ¶ 2 through end of exhibit.

C. Certification of LaQuay Dansby and attachment thereto at pages F-1, ¶ 2 through end of exhibit.

D. Certification of Paulo Arede and attachment thereto at pages D-1, ¶ 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. Directive #15-08.

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 N.J.S.A. 39:5-30 and 2A:17-56.44 would protect those rights.