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**ATTORNEY ID #020292008**  
**GEBHARDT & KIEFER, P.C.**  
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Clinton, New Jersey 08809-4001  
Tel. (908) 735-5161  
Attorneys for Petitioner, Township Franklin

IN THE MATTER OF THE  
APPLICATION OF THE TOWNSHIP OF  
FRANKLIN, A Municipal Corporation of  
the State of New Jersey,

Petitioner.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
GLOUCESTER COUNTY  
DOCKET NO.

CIVIL ACTION  
(Mount Laurel)

**COMPLAINT FOR DECLARATORY  
JUDGMENT PURSUANT TO  
N.J.S.A. 52:27D-313**

The Township of Franklin, a Municipal Corporation of the State of New Jersey, having its principal place of business at 1571 Delsea Drive, Franklinville, NJ 08322, by way of Complaint for Declaratory Judgment pursuant to N.J.S.A. 52:27D-313 and N.J.S.A. 2A:16-50 et seq. says:

**BACKGROUND**

1. Petitioner Township of Franklin (hereinafter “Petitioner” and/or “Franklin” and/or “Township”) is a body politic and corporate organized under the laws of the State of New Jersey.
2. On March 20, 2024, the New Jersey Legislature adopted P.L. 2024, c. 2, which amended the Fair Housing Act (FHA) (N.J.S.A. 52:27D-302 et seq.), abolished the Council of Affordable Housing (“COAH”), promulgated procedures and guidelines implementing the Affordable Housing Alternate Dispute Resolution Program (the “Program”), and created a new process for municipalities to come into constitutional compliance with their affordable housing obligations.

3. Franklin is located in Gloucester County in Region 5 pursuant to the N.J.S.A. 52:27D-304.2.

4. Franklin has made a good faith effort to meet its first, second, and third round affordable housing obligations.

5. Pursuant to first, second, and third round obligations, Franklin Township has provided for affordable housing through credits without controls and inclusionary overlay zoning.

6. Pursuant to N.J.S.A. 52:27D-304.1(f)(1)(a), a municipality may determine its present and prospective fair share obligation for affordable housing consistent with the established methodologies.

7. Pursuant to N.J.S.A. 52:27D-304.1(d), the Department of Community Affairs (the “DCA”) is responsible for providing a report setting forth non-binding calculations of regional and municipal affordable housing need for the Fourth Round based on the provisions of N.J.S.A. 52:27D-304.2 and -304.3.

8. Pursuant to N.J.S.A.52:27D-304.1(f)(1)(b), participating municipalities must adopt and file resolutions calculating their housing obligations for the Fourth Round by January 31, 2025.

9. P.L. 2024, c. 2 established the Program within the New Jersey Judiciary for the purpose of resolving disputes associated with municipal affordable housing obligations and compliance. In furtherance of that end, the Administrative Director of the Courts issued Directive #14-24 on December 13, 2024 directing municipalities to file declaratory judgment actions seeking certification of municipal compliance with the FHA within 48 hours of adoption of a resolution establishing the municipality’s fair share obligation.

10. On or about October 18, 2024, DCA issued a report entitled “Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background.” (the “DCA Report”).

11. On or about November 20, 2024, DCA provided a GIS data set that was used to calculate each municipality’s land capability factor in the DCA Report.

12. The webpage associated with such data set (<https://njdca.maps.arcgis.com/home/item.html?id=12acdf0a5104f8f8a2f604e96063e74>) notes:

The land areas identified in this dataset are based on an the best available data using publicly available data enumerated in N.J.S.A. 52:27D-304.3c(4) to estimate the area of developable land, within municipal and regional boundaries, that may accommodate development. *It is important to note that the identified areas could be over or under inclusive depending on various conditions and that municipalities are permitted to provide more detailed mappings as part of their participation in the Affordable Housing Dispute Resolution Program.* (emphasis added).

13. Pursuant to the DCA Report, the Fourth Round affordable housing obligations calculated for Franklin are as follows:

Present Need: 48

Prospective Need: 253

14. Franklin accepts the conclusions set forth in the DCA Report, except those regarding the land capacity allocation factor applicable to Franklin.

15. DCA maintains that the areas the DCA identified as developable may be “overinclusive.”

16. Franklin Township’s Professional Planner, has determined that such data set is “overinclusive” and has prepared a report dated January 15, 2025 stating such, which is attached hereto as **Exhibit A**.

17. Specifically, the Township Planner found that the data compiled by DCA to calculate the Township’s “land capacity factor” erroneously noted a 232.76 acre portion of Block 1902, Lot 1 (1457 Fries Mill Rd Franklinville NJ 08322) as vacant and developed land.

18. The Franklin Township Planning Board granted preliminary site plan approval to develop such property as a solar farm pursuant to a resolution adopted on June 18, 2024.

19. Removing such property from the inventory of vacant land in the Township reduces the total vacant land from 1,258.36 acres to 1,025.6 acres and reduces the “average allocation factor” applicable to Franklin from 2.78% to 2.36%.

20. Correcting the land capacity factor and the average allocation factor reduces the Township’s prospective affordable housing obligation as calculated in the DCA Report from 253 to 215.

21. N.J.S.A. 52:27D-304.1(f)(1)(b) provides that: “the municipality’s determination of its fair share obligation shall have a presumption of validity, if established in accordance with sections 6 and 7 of P.L. 2024, c. 2...”

22. Franklin’s calculation of need is entitled to a “presumption of validity” because it complies with Sections 6 and 7 of P.L. 2024, c. 2.

23. On January 13, 2025, Franklin adopted a Resolution setting forth its affordable housing obligations for the Fourth Round as follows:

Present Need: 48

Prospective Need: 253

A copy such resolution is attached hereto as Exhibit B.

24. Franklin desires that the Court review and accept the municipal fair share obligation of Franklin as set forth in the Resolution attached hereto as Exhibit B.

25. In compliance with P.L. 2024, c. 2, Franklin shall draft and file a Housing Element and Fair Share Plan demonstrating compliance with the Fourth Round affordable housing obligations.

26. After such filing, Franklin desires that the Court review and accept its Housing Element and Fair Share Plan and approve the Program's issuance of a Certificate of Compliance.

**COUNT ONE**

**(DECLARATORY RELIEF, CONSTITUTIONAL COMPLIANCE)**

27. Franklin repeats and realleges each and every allegation set forth in Paragraphs 1-26 of this Complaint as if set forth herein at length.

28. Pursuant to the Declaratory Judgments Act, N.J.S.A. 2A:16-50 et seq., N.J.S.A. 52:27D-313, and P.L. 2024, c. 2, Franklin has a right to a declaratory judgment verifying and confirming Franklin's full compliance with its constitutional affordable housing obligations

**WHEREFORE**, Petitioner, the Township of Franklin, respectfully seeks that the Court grant the following relief:

a. An Order exercising jurisdiction over the compliance by the Township of Franklin with its constitutional affordable housing obligations; and

b. An Order declaring, pursuant to N.J.S.A. 52:27D-304.1(f), that the affordable housing obligations set forth by Franklin Township in the Resolution dated January 13, 2025 are established; and

c. An Order declaring that the Township of Franklin is under the Court's voluntary compliance declaratory judgment jurisdiction and that the Township is immunized and protected against builder's remedy litigation and exclusionary zoning challenges; and

d. An Order declaring that the Township of Franklin's Housing Element and

Fair Share Plan, including its spending plan, satisfactorily addresses its affordable housing mandates and provides the Township with immunity and repose against builder's remedy litigation and exclusionary zoning challenges for a period of ten (10) years from the date of the Final Judgment.

- e. A Judgment of Compliance and Repose for a period of ten (10) years from its date of entry.
- f. An Order granting such additional relief as the Court deems equitable and just.

GEBHARDT & KIEFER, P.C.  
*Attorneys for Petitioner, Township of Franklin*

By /s/ Tara Ann St. Angelo  
TARA ANN ST. ANGELO

Dated: January 16, 2025

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, Tara Ann St. Angelo, Esq. is hereby designated as Trial Counsel for Petitioner Township of Franklin.

GEBHARDT & KIEFER, P.C.  
*Attorneys for Petitioner, Township of Franklin*

By: /s/ Tara Ann St. Angelo  
TARA ANN ST. ANGELO

Dated: January 16, 2025

**CERTIFICATION**

Pursuant to Rule 4:5-1, it is hereby certified that the matter in controversy is not the subject of any other action pending in any other Court or of a pending arbitration or administrative proceeding to the best of knowledge and belief. Franklin Township filed a declaratory judgment action related to its Third Round affordable housing obligations (*IMO Franklin Township*, Docket No.GLO-L-901-15). The Court granted a Final Judgment of Compliance and Repose in such action on May 21, 2024. To the best of our knowledge, no other action, arbitration or administrative proceeding is contemplated. Furthermore, we know of no other parties that should be joined in the above action.

GEBHARDT & KIEFER, P.C.  
*Attorneys for Petitioner, Township of Franklin*

By: /s/ Tara Ann St. Angelo  
TARA ANN ST. ANGELO

Dated: January 16, 2025

# **EXHIBIT A**



**Consulting & Municipal  
ENGINEERS**

January 15, 2024

Franklin Township  
1571 Delsea Drive  
Franklinville, NJ 08322

**Re: Affordable Housing 4<sup>th</sup> Round Obligation**

Dear Township Committee Members and Mayor,

Please accept this report as a summary of our calculations of the Township's Fourth Round affordable housing fair share obligation numbers.

Pursuant to the Fair Housing Act as amended in March of 2024 by P.L. 2024 c.2, each municipality in the state is required to determine its fair share of the regional need for low and moderate income housing, and adopt specific numbers for present need (rehabilitation) and prospective need (new construction, through a binding resolution.

The Fair Housing Act as amended outlines the process for determining regional needs for affordable housing as well as the methods for calculating each municipality's fair share obligation to address the overall regional need. The Act required that the Department of Community Affairs (DCA) prepare a report including calculations identifying the need for affordable housing in each of the six regions of the state for the Fourth Round of affordable housing, and using the best data available to then determine these municipal fair share numbers by allocating the regional need based the average of three factors: 1) the non-residential valuation in the municipality; 2) the land capacity in the municipality to accommodate new development; and 3) the household income of current residents of the municipality. The calculations prepared by DCA are intended to be used as guidance and are non-binding on municipalities.

The report prepared by DCA entitled "*Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background*", issued in October of 2024, determined that Franklin Township has the following Fourth Round affordable housing obligations:

- Present Need (Rehabilitation) – 48 units
- Prospective Need (New Construction) – 253 units

We have no objection to the methodology or overall calculations presented in the DCA report, as it appears to properly calculate Fourth Round municipal obligations in accordance with the requirements of the Fair Housing Act, using the best available statewide data to assess the three components noted above.

However, the DCA calculations in determining Franklin Township's land capacity factor have included a large parcel known as the Kiefer Farm (Block 1902, Lot 1) as a "vacant and available"

**CONSULTING AND MUNICIPAL ENGINEERS LLC**

NJ CERTIFICATE OF AUTHORIZATION NO. 24GA28359000

Barneget • Berlin • Camden • Howell • Medford • Monmouth Junction • Parlin



**Consulting & Municipal  
ENGINEERS**

Franklin Township  
Re: Affordable Housing Fourth Round Obligation

January 15, 2025  
Page 2

tract of land, that is no longer vacant or available. On April 26, 2024, a minor site plan approval was granted by the Franklin Township Planning Board on this 200 plus acre tract to develop the entirety of the site as a utility scale solar energy facility. As a result, this tract should not be considered available for development.

The calculations prepared by DCA noted Franklin Township to have 1,258.36 total acres of available land for development. With the 232.76 developable acres of the Kiefer farm removed from the calculation, the Township more accurately has 1,025.60 acres of vacant and available land. The Township's land capacity factor as calculated by DCA at 6.71% should be 5.46%, to reflect this more accurate data. When the updated land capacity factor is included in the calculation, the Township's average allocation factor changes from 2.78% to 2.36%, which reduces the prospective need obligation from 253 to 215 units.

Based on our adjustment to DCA's calculations Franklin Township's Fourth Round affordable housing obligations would be as follows:

- Present Need – 48 units
- Prospective Need – 216 units

Should you have any questions or require any additional information regarding this matter, please do not hesitate to contact this office.

Sincerely,  
**CME Associates**

A handwritten signature in black ink, appearing to read 'C. Dochney', written over a light blue circular stamp.

Christopher Dochney, PP, AICP  
*Township Planner*

cc: Tara St. Angelo, Esq. – Township Solicitor's Office

# **EXHIBIT B**

FRANKLIN TOWNSHIP  
GLOUCESTER COUNTY, NEW JERSEY  
R-37-25

**RESOLUTION REGARDING FAIR SHARE AFFORDABLE HOUSING  
OBLIGATIONS FOR THE FOURTH ROUND**

**WHEREAS**, the New Jersey Supreme Court, through its rulings in Southern Burlington County NAACP v. Mount Laurel, 67 13 N.J. 151 (1975) and Southern Burlington County NAACP 14 v. Mount Laurel, 92 N.J. 158 (1983), has determined that every municipality in New Jersey has a constitutional obligation to provide through its land use regulations a realistic opportunity for its fair share of its region's present and prospective needs for housing for low- and moderate-income families; and

**WHEREAS**, on March 20, 2024, Governor Murphy signed P.L.2024, c.2. into law, establishing a new framework for determining and enforcing municipalities' affordable housing obligations under the New Jersey Supreme Court's Mount Laurel doctrine and the New Jersey Fair Housing Act (N.J.S.A. 52:27D-301 et al.); and

**WHEREAS**, pursuant to N.J.S.A. 52:27D-304.1(f)(1)(b), each municipality must adopt a binding resolution no later than January 31, 2025 determining its present and prospective fair share obligation for the Fourth Round; and

**WHEREAS**, pursuant to Administrative Directive #14-24 issued by the Administrative Office of the Courts on December 13, 2024, "[a] municipality seeking a certification of compliance with the [Fair Housing Act] shall file an action in the form of a declaratory judgment complaint and Civil Case Information Statement (Civil CIS) in the county in which the municipality is located" within 48 hours of adopting the municipal resolution of fair share obligations; and

**WHEREAS**, pursuant to N.J.S.A. 52:27D-304.1(d), the New Jersey Department of Community Affairs issued "a report on the calculations of regional need and municipal obligations for each region of the State" on or about October 18, 2024 (the "DCA Report"); and

**WHEREAS**, the DCA Report set the municipal obligation for Franklin Township as follows:

Present Need: 48  
Prospective Need: 253

**WHEREAS**, pursuant to N.J.S.A. 52:27D-304.1(f)(1)(a), a municipality may determine its present and prospective fair share obligation for affordable housing consistent with the established methodologies; and

**WHEREAS**, the data compiled by DCA to calculate the Township's "land capacity factor" erroneously noted a 232.76 acre portion of Block 1902, Lot 1 (1457 Fries Mill Rd Franklinville NJ 08322) as vacant and developed land; and

**WHEREAS**, the Township Planning Board granted preliminary site plan approval to develop such property as a solar farm pursuant to a resolution adopted on June 18, 2024; and

**WHEREAS**, removing such property from the inventory of vacant land in the Township reduces the total vacant land from 1,258.36 acres to 1,025.6 acres and reduced the "average allocation factor" from 2.78% to 2.36%; and

**WHEREAS**, the reduction in the land capacity factor and the average allocation factor reduced the Township's prospective affordable housing obligation from 253 to 215; and

**NOW, THEREFORE, BE IT RESOLVED**, by the Mayor and Committee of the Township of Franklin, Gloucester County, New Jersey, as follows:

1. Frankling Township hereby determines, based on the DCA Report, corrections to the

data utilized therein, and advice of the Municipal Planner and Attorney, to adopt the following obligations as its binding Fourth Round Affordable Housing Obligations subject to adjustments made to account for decisions of a court of competent jurisdiction, a change in legislation, lack of availability of public water or sewer infrastructure or capacity (i.e. a durational adjustment), lack of vacant land, and / or survey pertaining to present need pursuant to N.J.A.C. 5:93-5.2(a) and N.J.A.C. 5:93-Appendix C). Any such adjustments will be adopted as part of the municipality's Fourth Round Housing Element and Fair Share Plan.

Present Need: 48  
 Prospective Need: 215

2. The Municipal Clerk and Municipal Attorney are authorized to take all actions required by N.J.S.A. 52:27D-304.1(f)(1)(b), including:
  - a. Filing a declaratory judgement action with the Superior Court and filing a copy of this Resolution with the Department of Community Affairs within forty-eight hours following adoption of this Resolution.
  - b. Publishing this Resolution on the Township's website.
3. The Municipal Attorney, Municipal Planner, and (if appointed) Affordable Housing Subcommittee are authorized to take all actions to draft documents necessary to comply with all Fourth Round affordable housing obligations, including drafting a Housing Element and Fair Share Plan, an Affordable Housing Trust Spending Plan, and effectuating ordinances and resolutions.
4. This Resolution shall take effect immediately.

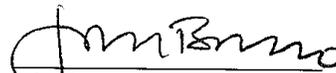
Adopted: January 14, 2025

COMMITTEE MEMBER	MOTION	2 <sup>nd</sup>	YES	ABSTAIN	NO	ABSENT
<b>J. Bruno</b>			✓			
<b>T. Doyle</b>		✓	✓			
<b>M. Fiorella</b>			✓			
<b>J. Keen</b>						✓
<b>M. Marsh</b>	✓		✓			

Attest:

Township of Franklin

  
 Barbara Freijomil, Clerk

  
 John Bruno, Mayor

CERTIFICATION

I, Barbara Freijomil, Clerk of the Township of Franklin, do hereby certify that the foregoing Resolution was presented and duly adopted by the Township Committee at a meeting held on January 14, 2025.

  
 Barbara Freijomil, Clerk



FRANKLIN TOWNSHIP  
GLOUCESTER COUNTY, NEW JERSEY  
R-37-25

**RESOLUTION REGARDING FAIR SHARE AFFORDABLE HOUSING  
OBLIGATIONS FOR THE FOURTH ROUND**

**WHEREAS**, the New Jersey Supreme Court, through its rulings in Southern Burlington County NAACP v. Mount Laurel, 67 13 N.J. 151 (1975) and Southern Burlington County NAACP 14 v. Mount Laurel, 92 N.J. 158 (1983), has determined that every municipality in New Jersey has a constitutional obligation to provide through its land use regulations a realistic opportunity for its fair share of its region's present and prospective needs for housing for low- and moderate-income families; and

**WHEREAS**, on March 20, 2024, Governor Murphy signed P.L.2024, c.2. into law, establishing a new framework for determining and enforcing municipalities' affordable housing obligations under the New Jersey Supreme Court's Mount Laurel doctrine and the New Jersey Fair Housing Act (N.J.S.A. 52:27D-301 et al.); and

**WHEREAS**, pursuant to N.J.S.A. 52:27D-304.1(f)(1)(b), each municipality must adopt a binding resolution no later than January 31, 2025 determining its present and prospective fair share obligation for the Fourth Round; and

**WHEREAS**, pursuant to Administrative Directive #14-24 issued by the Administrative Office of the Courts on December 13, 2024, "[a] municipality seeking a certification of compliance with the [Fair Housing Act] shall file an action in the form of a declaratory judgment complaint and Civil Case Information Statement (Civil CIS) in the county in which the municipality is located" within 48 hours of adopting the municipal resolution of fair share obligations; and

**WHEREAS**, pursuant to N.J.S.A. 52:27D-304.1(d), the New Jersey Department of Community Affairs issued "a report on the calculations of regional need and municipal obligations for each region of the State" on or about October 18, 2024 (the "DCA Report"); and

**WHEREAS**, the DCA Report set the municipal obligation for Franklin Township as follows:

Present Need: 48  
Prospective Need: 253

**WHEREAS**, pursuant to N.J.S.A. 52:27D-304.1(f)(1)(a), a municipality may determine its present and prospective fair share obligation for affordable housing consistent with the established methodologies; and

**WHEREAS**, the data compiled by DCA to calculate the Township's "land capacity factor" erroneously noted a 232.76 acre portion of Block 1902, Lot 1 (1457 Fries Mill Rd Franklinville NJ 08322) as vacant and developed land; and

**WHEREAS**, the Township Planning Board granted preliminary site plan approval to develop such property as a solar farm pursuant to a resolution adopted on June 18, 2024; and

**WHEREAS**, removing such property from the inventory of vacant land in the Township reduces the total vacant land from 1,258.36 acres to 1,025.6 acres and reduced the "average allocation factor" from 2.78% to 2.36%; and

**WHEREAS**, the reduction in the land capacity factor and the average allocation factor reduced the Township's prospective affordable housing obligation from 253 to 215; and

**NOW, THEREFORE, BE IT RESOLVED**, by the Mayor and Committee of the Township of Franklin, Gloucester County, New Jersey, as follows:

1. Frankling Township hereby determines, based on the DCA Report, corrections to the

data utilized therein, and advice of the Municipal Planner and Attorney, to adopt the following obligations as its binding Fourth Round Affordable Housing Obligations subject to adjustments made to account for decisions of a court of competent jurisdiction, a change in legislation, lack of availability of public water or sewer infrastructure or capacity (i.e. a durational adjustment), lack of vacant land, and / or survey pertaining to present need pursuant to N.J.A.C. 5:93-5.2(a) and N.J.A.C. 5:93-Appendix C). Any such adjustments will be adopted as part of the municipality's Fourth Round Housing Element and Fair Share Plan.

Present Need: 48  
 Prospective Need: 215

2. The Municipal Clerk and Municipal Attorney are authorized to take all actions required by N.J.S.A. 52:27D-304.1(f)(1)(b), including:
  - a. Filing a declaratory judgement action with the Superior Court and filing a copy of this Resolution with the Department of Community Affairs within forty-eight hours following adoption of this Resolution.
  - b. Publishing this Resolution on the Township's website.
3. The Municipal Attorney, Municipal Planner, and (if appointed) Affordable Housing Subcommittee are authorized to take all actions to draft documents necessary to comply with all Fourth Round affordable housing obligations, including drafting a Housing Element and Fair Share Plan, an Affordable Housing Trust Spending Plan, and effectuating ordinances and resolutions.
4. This Resolution shall take effect immediately.

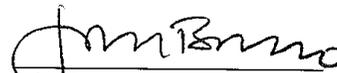
Adopted: January 14, 2025

COMMITTEE MEMBER	MOTION	2 <sup>nd</sup>	YES	ABSTAIN	NO	ABSENT
<b>J. Bruno</b>			✓			
<b>T. Doyle</b>		✓	✓			
<b>M. Fiorella</b>			✓			
<b>J. Keen</b>						✓
<b>M. Marsh</b>	✓		✓			

Attest:

Township of Franklin

  
 Barbara Freijomil, Clerk

  
 John Bruno, Mayor

CERTIFICATION

I, Barbara Freijomil, Clerk of the Township of Franklin, do hereby certify that the foregoing Resolution was presented and duly adopted by the Township Committee at a meeting held on January 14, 2025.

  
 Barbara Freijomil, Clerk

# Civil Case Information Statement

## Case Details: GLOUCESTER | Civil Part Docket# L-000068-25

**Case Caption:** IN THE MATTER OF FRANKLIN TWP  
**Case Initiation Date:** 01/16/2025  
**Attorney Name:** TARA ANN ST ANGELO  
**Firm Name:** GEBHARDT & KIEFER, PC  
**Address:** 1318 ROUTE 31 NORTH  
ANNANDALE NJ 08801  
**Phone:** 9087355161  
**Name of Party:** PETITIONER : IMO Township of Franklin  
**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** AFFORDABLE HOUSING  
**Document Type:** Complaint  
**Jury Demand:** NONE  
**Is this a professional malpractice case?** NO  
**Related cases pending:** NO  
**If yes, list docket numbers:**  
**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO  
**Does this case involve claims related to COVID-19?** NO  
**Are sexual abuse claims alleged by: IMO Township of Franklin?**  
NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO **Medical Debt Claim?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

01/16/2025  
Dated

/s/ TARA ANN ST ANGELO  
Signed

