

**DEVON TYLER BARBER,**  
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**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – CIVIL PART  
ATLANTIC COUNTY**

**DEVON TYLER BARBER,**  
*Plaintiff, Pro Se,*  
v.  
**TOWNSHIP OF HAMILTON, et al.,**  
Defendants.

Docket No.: ATL-L-003252-25

**LETTER OF CLARIFICATION  
(LIMITED SCOPE)**

Honorable Court:

Plaintiff respectfully submits this brief clarification solely to assist the Court in advance of the Court's consideration of the pending motions scheduled for decision on January 9, 2026.

Plaintiff acknowledges that the Court did not enter the proposed order circulated following the prior proceeding and understands the Court's determination to resolve the issues presented through noticed motion practice and decision on the papers.

For avoidance of doubt, Plaintiff clarifies that the pending motions do **not** request this Court to:

1. Vacate, review, or modify any municipal court judgment;
2. Adjudicate the validity of any underlying criminal charge; or
3. Grant permanent or merits-based injunctive relief.

Instead, the narrow and limited issue presented is whether Defendants may lawfully continue to rely, as a predicate for enforcement action, on a New Jersey Motor Vehicle Commission driver's license suspension that is presently under active constitutional challenge, pending resolution of that challenge in the proper forum.

Plaintiff seeks only temporary, equitable guidance necessary to preserve the status quo and to prevent ongoing collateral harm arising from continued reliance on an unresolved administrative action. Plaintiff does not assert immunity, does not seek to interfere with municipal jurisdiction, and does not request suppression or dismissal of any charge through this Court.

This clarification is submitted in good faith, without argument and without waiver of any rights, solely to aid the Court's case management and to ensure the matters under advisement are considered on a clear and appropriately limited record.

Respectfully submitted,

/s/ **Devon Tyler Barber**  
Devon Tyler Barber, Plaintiff Pro Se  
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Atlantic City, New Jersey 08401  
(609) 862-8808 | dTb33@PM.Me

Date: December 23<sup>rd</sup>, 2025

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**Certification of Service re Correspondence  
and Record Clarification**

I, **Devon Tyler Barber**, certify as follows:

1. I am the Plaintiff/Movant in the above-captioned matter.
2. On **December 23, 2025**, I served a true and correct copy of the following documents:
  - **Letter of Clarification Regarding Scope of Pending Motions;** and
  - **Notice of Commencement of Discovery Review,**upon counsel for Defendants, **Mr. Kenneth M. Warren, Jr., Esq.**, by electronic mail, using the email address customarily used by counsel for service in this matter.
3. Service was made contemporaneously with filing through the **New Jersey Judiciary Electronic Document Submission (JEDS)** system, where applicable.
4. This Certification is submitted in good faith and in compliance with the New Jersey Court Rules governing service.

I certify that the foregoing statements are true. I am aware that if any statement herein is willfully false, I am subject to punishment.

Date: **December 23, 2025**

/s/ **Devon Tyler Barber**  
Devon Tyler Barber, Plaintiff/Movant, Pro Se