

DEVON TYLER BARBER,
Plaintiff/Movant, Pro Se
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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

SUPPLEMENTAL CERTIFICATION OF
DEVON TYLER BARBER

(Re: Proportionality and Release Conditions)

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

1. I am the Plaintiff in this action. I submit this Supplemental Certification solely to clarify the **manner and consequences** of the vehicle tow and my release conditions, and **not** to dispute the existence of municipal authority to tow, which the Court has already addressed.
2. For purposes of this submission, I do **not contest** that officers may, under certain circumstances, possess statutory authority to tow a vehicle for administrative violations such as lapsed registration or insurance.
3. My claim concerns **how that authority was exercised**, including the location of the stop, the absence of basic inquiry into reasonable alternatives, and the conditions of my release after midnight.
4. At the time of the stop, I was **minutes from my motel by vehicle** and within approximately **0.6 miles (about a 13-minute walk)** of my destination if the vehicle had been left safely nearby.
5. Instead, the stop and tow occurred in a location that was **remote from services, commercial lighting, and overnight transit**, materially increasing the hardship associated with release on foot.

6. I was released from the Hamilton Township Police Department at approximately **12:15–12:30 a.m.**, after my vehicle had already been seized, despite circumstances indicating that I lacked access to immediate transportation at the time of release and that **no meaningful overnight public transportation** serviced the route to my destination. A supervising sergeant provided a signed business card to be used as a “bus pass,” although no operative bus service was available at that hour.
7. Officers did not ask me where I was going, nor did they inquire about proximity, safe parking alternatives, or transportation options, **to my recollection and understanding at the time.**
8. As reflected in the attached map exhibits, the **distance from the police station to my destination** was substantially greater than the distance from the stop location, thereby **increasing the risk and hardship created by the release decision.**
9. These circumstances were **foreseeable at the time of release** and were not inherent to the underlying administrative violations, but instead resulted from discretionary enforcement and release decisions.
10. This certification is submitted to assist the Court in evaluating the **reasonableness and proportionality of the execution of enforcement and release decisions**, independent of any determination regarding municipal tow authority. No immediate relief is sought by this submission. This submission is intended solely to supplement the factual record.

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 24, 2025

/s/ Devon Tyler Barber, Plaintiff, Pro Se

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 LAW DIVISION – CIVIL PART
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EXHIBIT INDEX

v.

TOWNSHIP OF HAMILTON, et al.,
 Defendants

EXHIBIT	DESCRIPTION
EXHIBIT A	Proximity of stop location to Plaintiff's destination (approx. 0.6 miles)
EXHIBIT B	Location of Hamilton Township Police Department relative to stop location
EXHIBIT C	Walking distance from police station after release (approx. 1.7 miles)
EXHIBIT D	Transit context showing lack of overnight service

The attached exhibits are submitted **solely for contextual and geographic clarification** of the proportionality and release-condition issues addressed in this Supplemental Certification. The exhibits are limited to map-based depictions illustrating relative distances, walking routes, and transit context relevant to the **foreseeability and reasonableness of the release decision following vehicle impoundment.**

These exhibits are **not offered to dispute municipal tow authority**, the existence of administrative violations, or any prior ruling of the Court. Rather, they are submitted to assist the Court in visualizing objective, undisputed spatial facts that bear on the **manner and consequences of enforcement**, including the availability of reasonable alternatives and the increased hardship created by the chosen release location and timing.

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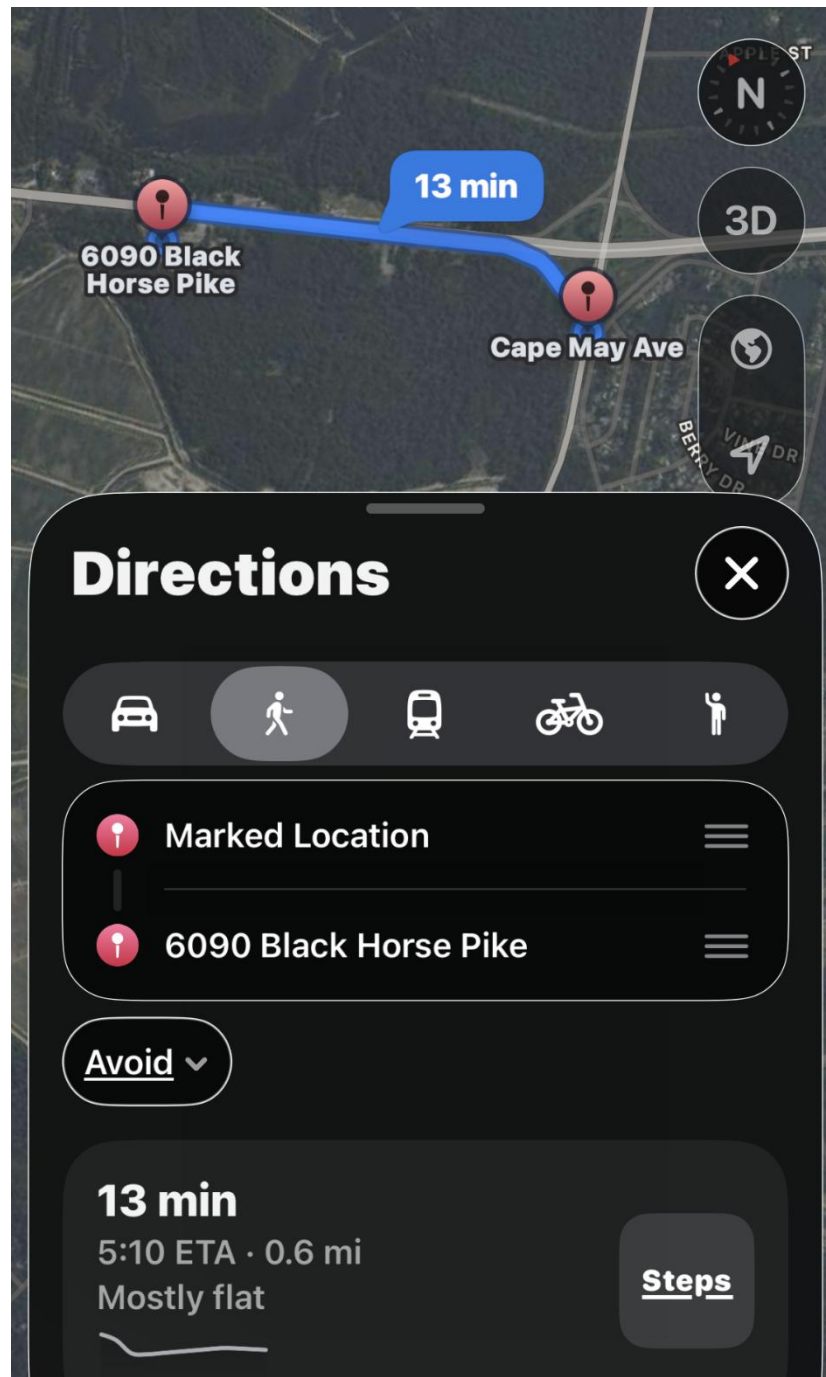
TOWNSHIP OF HAMILTON, et al.,
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Docket No.: ATL-L-003252-25

EXHIBIT A

(Map showing stop location relative to Plaintiff's motel/shelter; establishes that Plaintiff was near destination at time of stop.)

Proximity of stop location to Plaintiff's destination (approx. 0.6 miles / 13-minute walk)



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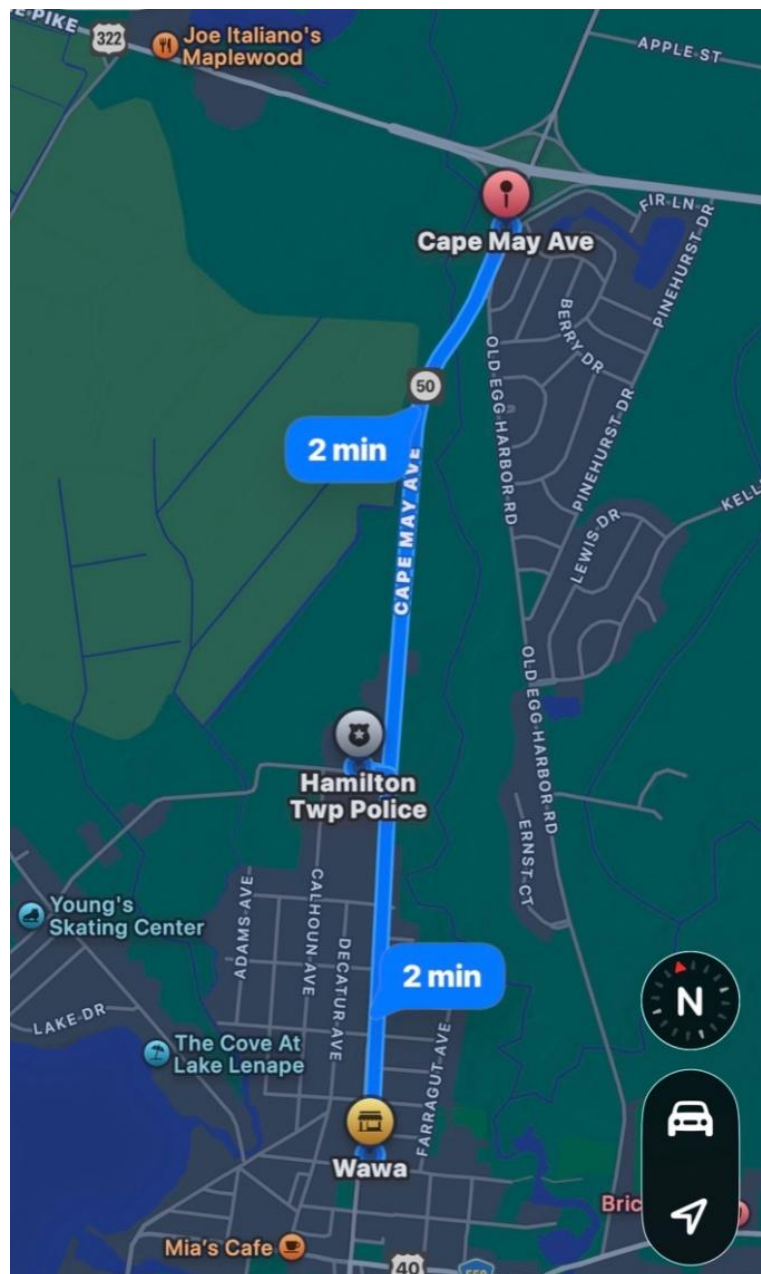
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EXHIBIT B

(Map depicting the relative proximity of Wawa, the location of the traffic stop, and the Hamilton Township Police Department along Cape May Avenue, demonstrating that all locations are situated along the same roadway corridor)

Location of Wawa and Hamilton Township Police Department relative to ~ stop location:



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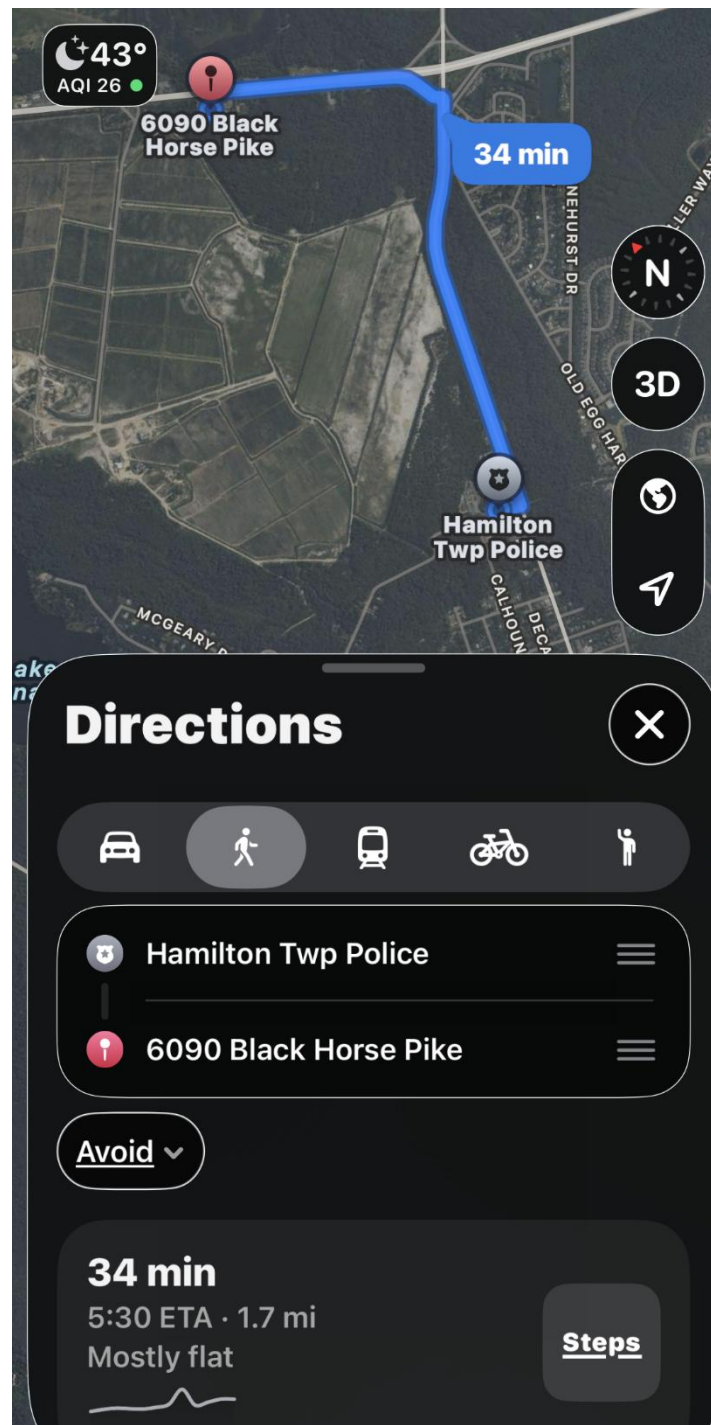
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EXHIBIT C

v.

TOWNSHIP OF HAMILTON, et al.,
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Walking distance from police station after release, approximately 1.7 miles;



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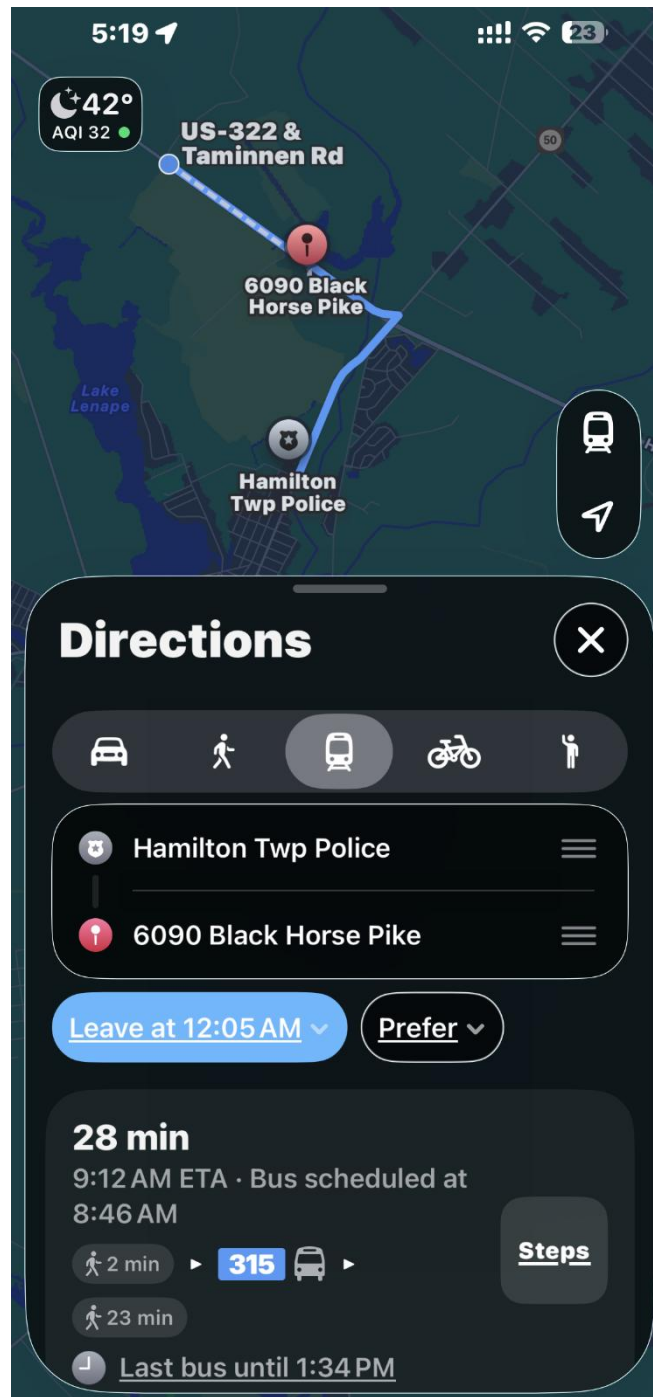
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EXHIBIT D

v.

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Transit context showing lack of overnight service:



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CERTIFICATION OF SERVICE

(Re: Proportionality and Release Conditions)

I, Devon Tyler Barber, certify that on December 24, 2025, I served a true and correct copy of the following document:

- Supplemental Certification of Devon Tyler Barber (Re: Proportionality and Release Conditions), with Exhibits A–D,

upon counsel for Defendants, Mr. Warren, by electronic mail to the address customarily used by counsel for service in this matter.

Service was made contemporaneously with filing through the New Jersey Judiciary Electronic Document Submission (JEDS) system, in compliance with the New Jersey Court Rules.

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 24, 2025

/s/ Devon Tyler Barber