

**DEVON TYLER BARBER,**  
Plaintiff/Movant, Pro Se  
3536 Pacific Avenue, Apt. A5  
Atlantic City, New Jersey 08401  
Telephone: (609) 862-8808  
Email: [dTb33@PM.Me](mailto:dTb33@PM.Me)

**SUPERIOR COURT OF NEW JERSEY**  
**LAW DIVISION – CIVIL PART**  
**ATLANTIC COUNTY**

**DEVON TYLER BARBER,**  
*Plaintiff, Pro Se,*

v.

**TOWNSHIP OF HAMILTON;**  
**OFFICER EDWARD RUIZ;**  
**OFFICER BRYAN MERRITT;**  
**OFFICER CRISTIAN MARTIN;**  
**OFFICER KYLE MCKNIGHT;**  
**OFFICER RACHEL HARE;**  
**SERGEANT DENNIS BAKKER;**  
**SERGEANT GARY CLUNE;**  
**OFFICER NIJON ISOM,**

Defendants.

Docket No.: **ATL-L-003252-25**

**CIVIL ACTION**

**SECOND AMENDED COMPLAINT**

**PRELIMINARY STATEMENT**

1. This civil-rights action arises from an unlawful traffic stop, prolonged detention, use of force, and vehicle seizure occurring on **November 29, 2025**, in Hamilton Township, Atlantic County, New Jersey.
2. Plaintiff brings this action pursuant to the **New Jersey Civil Rights Act**, N.J.S.A. 10:6-1 to -2, seeking damages and equitable relief for violations of rights secured by the New Jersey Constitution.

3. Through discovery, including body-worn camera footage, Plaintiff identified additional officers who directly participated in, supervised, or failed to intervene in the unconstitutional conduct alleged. This Amended Complaint substitutes those officers for previously pled fictitious defendants pursuant to **R. 4:26-4** and relates back under **R. 4:9-3**.
4. **This action arises from more than an isolated incident.** Over a period exceeding two years prior to the events described herein, Plaintiff has been subjected to repeated investigative detentions, criminal charges, and enforcement actions arising from routine, civil, or constitutionally protected conduct. This course of events has included the issuance of process that Plaintiff contends was never properly served despite Plaintiff maintaining a registered residence on file with the New Jersey Motor Vehicle Commission, followed by an arrest by sheriff's officers on an alleged failure to appear. Plaintiff was thereafter detained for multiple days and confined in unsanitary holding conditions, including exposure to human waste and delayed custodial response, causing significant hardship and reinforcing the pattern of disproportionate and unlawful escalation alleged herein.
5. Plaintiff alleges that these encounters followed a recurring pattern in which lawful behavior was mischaracterized as criminal, minor matters were escalated through overcharging, and officer-safety rationales were invoked post hoc to justify detentions, arrests, or force unsupported by contemporaneous facts.
6. The incident of November 29, 2025 represents a foreseeable culmination of this pattern and reflects systemic failures in training, supervision, and discipline within the Township of Hamilton and its police department.

## **JURISDICTION AND VENUE**

7. Jurisdiction is proper pursuant to the New Jersey Constitution and the New Jersey Civil Rights Act, N.J.S.A. 10:6-2.
8. Venue is proper in Atlantic County because the events giving rise to this action occurred in Hamilton Township.

## **PARTIES**

9. Plaintiff **Devon Tyler Barber** is a resident of the State of New Jersey.
10. Defendant **Township of Hamilton** is a New Jersey municipal corporation responsible for the policies, customs, training, and supervision of the Hamilton Township Police Department (“HTPD”).
11. Defendant **Officer Edward Ruiz** was at all relevant times a sworn HTPD officer acting under color of law.
12. Defendant **Officer Bryan Merritt** was at all relevant times a sworn HTPD officer acting under color of law.
13. Defendant **Officer Cristian Martin** (name as reflected on body-worn camera footage; spelling subject to confirmation) was at all relevant times a sworn HTPD officer acting under color of law.
14. Defendant **Officer Kyle McKnight** was at all relevant times a sworn HTPD officer acting under color of law and acted as a senior officer on scene.
15. Defendant **Officer Rachel Hare** was at all relevant times a sworn HTPD officer acting under color of law.
16. Defendant **Sergeant Dennis Bakker** was at all relevant times a supervisory officer with HTPD acting under color of law.

17. Defendant **Sergeant Gary Clune** was at all relevant times a supervisory officer with HTPD acting under color of law.
18. Defendant **Officer Nijon Isom** was at all relevant times a sworn HTPD officer acting under color of law.
19. **Each individual defendant is sued in his or her individual capacity for damages.** Any official-capacity claims are asserted solely for prospective declaratory or injunctive relief.

## **FACTUAL ALLEGATIONS**

20. On November 29, 2025, Plaintiff was operating his vehicle in Hamilton Township when he was stopped by **Edward Ruiz**, whose sole articulated basis for the stop related to Plaintiff's driver's license status.
21. The stop was unlawfully prolonged without independent reasonable suspicion, investigative purpose, or exigency, in violation of clearly established constitutional limits governing traffic detentions.
22. Plaintiff remained compliant and stationary for approximately fifteen minutes while officers disengaged from the vehicle and failed to pursue any lawful investigative task.
23. Upon returning, officers forcibly removed Plaintiff from the vehicle without issuing a clear arrest command and without any intervening conduct by Plaintiff justifying escalation.
24. **Bryan Merritt** later admitted on body-worn camera, while at the station, that he physically pulled Plaintiff's legs during the extraction.
25. **Edward Ruiz** subsequently articulated a justification that Plaintiff "was going to run," despite Plaintiff's prolonged compliance and the absence of any contemporaneous indication of flight risk.

26. **Cristian Martin, Kyle McKnight, and Rachel Hare** were present on scene, observed the seizure and use of force, and had the opportunity and ability to intervene but failed to do so.

27. **Kyle McKnight**, acting as a senior officer, made statements evidencing a punitive rationale tied to Plaintiff's perceived "rights or privileges," rather than any legitimate safety concern.

28. **Gary Clune and Dennis Bakker**, as supervisory officers, failed to supervise, control, or intervene to prevent the unlawful conduct of their subordinates.

29. **Nijon Isom**, acting in a higher-ranking or command capacity, likewise failed to intervene or correct the unlawful actions occurring in his presence.

30. The escalation to force was not precipitated by Plaintiff's conduct, but followed a pattern in which officers recharacterized lawful, non-threatening behavior as criminal or dangerous in order to justify detention, arrest, or force already applied.

31. Plaintiff's vehicle was subsequently seized and impounded, and remains unavailable to Plaintiff solely due to the accumulation of towing and storage charges and associated administrative requirements, despite the vehicle being otherwise capable of lawful release upon payment, proof of insurance, and registration compliance. The continued deprivation of the vehicle has caused ongoing hardship by preventing Plaintiff from securing employment and meeting the financial conditions necessary for its release.

## **COUNT I**

### **UNLAWFUL SEIZURE AND FALSE ARREST**

*(NJCRA – N.J.S.A. 10:6-2)*

32. Defendants lacked lawful authority to prolong the stop once its original mission concluded and lacked probable cause or reasonable suspicion to detain Plaintiff further.
33. The seizure of Plaintiff's person was effectuated through force rather than lawful arrest procedures, rendering it unreasonable *per se*.
34. The unlawful seizure resulted directly from Defendants' practice of escalating civil encounters into criminal enforcement without lawful basis.

## **COUNT II**

### **EXCESSIVE FORCE**

*(NJCRA – N.J.S.A. 10:6-2)*

35. The force used against Plaintiff was objectively unreasonable under the totality of the circumstances, including the absence of resistance, flight, threat, or exigent safety concern.
36. **Edward Ruiz and Bryan Merritt** applied force not to overcome resistance, but to compel compliance where no lawful arrest basis existed.
37. The force was employed to justify a detention already rendered unlawful by prior constitutional violations.

## **COUNT III**

### **FAILURE TO INTERVENE**

38. Defendants Martin, McKnight, Hare, Bakker, Clune, and Isom each observed or were aware of the unconstitutional seizure and use of force.
39. Each had sufficient time, proximity, and authority to intervene, yet failed to take reasonable steps to prevent or halt the violations.

## **COUNT IV**

### **SUPERVISORY LIABILITY**

40. Defendants Bakker, Clune, and Isom knew or should have known of the unlawful conduct and failed to prevent, correct, or discipline it.

## **COUNT V**

### **MUNICIPAL LIABILITY**

*(NJCRA / Monell)*

41. The constitutional violations were caused by the Township of Hamilton's policies, customs, and practices, including but not limited to:

- a. Treating lawful civil conduct as grounds for criminal investigation;
- b. Overcharging minor or non-criminal encounters to justify detention or force;
- c. Failing to train officers on constitutional limits governing stop duration and escalation;
- d. Tolerating post-hoc justifications for force unsupported by contemporaneous facts; and
- e. Failing to discipline or correct officers who escalate encounters absent lawful cause.

42. These practices reflect deliberate indifference to the rights of persons with whom HTPD officers come into contact and were the moving force behind Plaintiff's injuries.

43. The Township of Hamilton had actual or constructive notice, through prior similar incidents and supervisory awareness, that its policies, customs, and training deficiencies created a substantial risk of constitutional violations, yet failed to take reasonable corrective action.

## **DAMAGES AND RELIEF**

**WHEREFORE**, Plaintiff respectfully demands judgment as follows:

- A. Declaratory relief that Defendants' conduct violated Plaintiff's rights under the New Jersey Constitution and the NJCRA;
- B. Injunctive relief prohibiting the Township of Hamilton and HTPD from:
  - 1. Prolonging traffic or investigatory stops absent independent reasonable suspicion;
  - 2. Using force to compel compliance where no lawful arrest basis exists;
  - 3. Recharacterizing civil behavior as criminal post hoc to justify force;
- C. An order requiring constitutionally adequate training and supervision regarding stop escalation and use of force;
- D. Compensatory damages;
- E. Punitive damages against individual defendants;
- F. An award of costs, disbursements, and litigation expenses permitted by N.J.S.A. 10:6-2(f), including filing fees, service costs, copying, transcript costs, and other out-of-pocket expenses incurred by Plaintiff as a pro se litigant;
- G. Such other and further relief as the Court deems just and equitable.

## **JURY DEMAND**

Plaintiff demands trial by jury on all issues so triable.

Date: December 27, 2025

**Respectfully submitted,**  
**/s/ Devon Tyler Barber**  
Plaintiff, Pro Se

## Service of Supplemental Certification and Record Orientation Index

From info@tillerstead.com <info@tillerstead.com>  
To Kenneth Warren<ken@leonardlawgroup.com>  
Date Saturday, December 27th, 2025 at 8:47 AM

Good morning Mr. Warren,

This email confirms service of the following filings in *Barber v. Township of Hamilton, et al.*, Docket No. **ATL-L-003252-25**, filed today via JEDS:

1. **Notice of Motion for Leave to File Second Amended Complaint**, together with the Brief in Support, Certification of Devon Tyler Barber, and Proposed Form of Order;
2. **Proposed Second Amended Complaint** (attached as an exhibit to the motion);
3. **Supplemental Certification of Devon Tyler Barber**  
(*Re: Context, Proportionality, and Due-Process Impact*), together with its Certificate of Service; and
4. **Plaintiff's Record Orientation Index**, filed as General Correspondence for administrative reference only.

Service is made via electronic mail to the address customarily used by counsel for service in this matter.

Thank you.

Respectfully,  
Devon Tyler Barber  
Plaintiff/Movant, Pro Se  
[dTb33@PM.Me](mailto:dTb33@PM.Me)

---

**Tillerstead LLC**  
**Honest Work • Built to Last**  
NJ Home Improvement Contractor #13VH10808800  
[www.tillerstead.com](http://www.tillerstead.com) | (609) 862-8808 | [info@tillerstead.com](mailto:info@tillerstead.com)

Sent with [Proton Mail](#) secure email.

On Wednesday, December 24th, 2025 at 6:52 PM, Tillerstead LLC <info@tillerstead.com> wrote:

Dear Mr. Warren,

Please accept this email as service of Plaintiff's Supplemental Certification of Devon Tyler Barber (Re: Proportionality and Release Conditions), with Exhibits A–D, which has been filed today via JEDS in the above-captioned matter.

Regards,  
Devon Tyler Barber  
Plaintiff, Pro Se

**Tillerstead LLC****Honest Work • Built to Last**

NJ Home Improvement Contractor #13VH10808800

www.tillerstead.com | (609) 862-8808 | info@tillerstead.com

Sent with [Proton Mail](#) secure email.

On Tuesday, December 23rd, 2025 at 11:55 PM, Tillerstead LLC <info@tillerstead.com> wrote:

Good evening Mr. Warren,

Please accept this email as service of Plaintiff's Supplemental Certification of Devon Tyler Barber in Support of Record Clarification and Due-Process Context, together with Exhibits A through E, filed via JEDS in the above-captioned matter.

Thank you.

Respectfully,

Devon Tyler Barber

Plaintiff/Movant, Pro Se

[dTb33@pm.me](mailto:dTb33@pm.me)

**Tillerstead LLC****Honest Work • Built to Last**

NJ Home Improvement Contractor #13VH10808800

www.tillerstead.com | (609) 665-9350 | [info@tillerstead.com](mailto:info@tillerstead.com)

Sent with [Proton Mail](#) secure email.

On Tuesday, December 23rd, 2025 at 5:20 PM, Tillerstead LLC <info@tillerstead.com> wrote:

This email serves Plaintiff's **Certification of Devon Tyler Barber Regarding Body-Worn Camera Discovery (Timestamp Table)** and accompanying **Certification of Service**, filed today via JEDS.

Respectfully,

/s/ Devon Tyler Barber

Devon Tyler Barber, Pro Se

[dTb33@pm.me](mailto:dTb33@pm.me)

**Tillerstead LLC****Honest Work • Built to Last**

NJ Home Improvement Contractor #13VH10808800

www.tillerstead.com | (609) 862-8808 | [info@tillerstead.com](mailto:info@tillerstead.com)

Sent with [Proton Mail](#) secure email.

On Tuesday, December 23rd, 2025 at 3:19 PM, Tillerstead LLC <info@tillerstead.com> wrote:

Counsel,

Please note that, following my earlier service, I have now filed and am serving the attached **Letter of Clarification and Certification of Service** via JEDS.

This correspondence is submitted solely to clarify the limited scope of the pending motions and for record completeness.

Respectfully,

Devon Tyler Barber  
Plaintiff/Movant, pro se  
3536 Pacific Avenue, Apt. A5  
Atlantic City, NJ 08401

(640) 281-0197  
dTb33@PM.Me

**Tillerstead LLC**  
**Honest Work • Built to Last**  
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Sent with [Proton Mail](#) secure email.

On Tuesday, December 23rd, 2025 at 2:18 PM, Tillerstead LLC <info@tillerstead.com> wrote:

Good afternoon Mr. Warren,

Please accept this email as service of the following documents in the above-captioned matter:

- Certification of Devon Tyler Barber (In Support of Record Clarification);
- Notice of Commencement of Discovery Review; and
- Certificate of Service.

These documents are being filed with the Court via JEDS contemporaneously with this service.

Thank you.

Respectfully,

Devon Tyler Barber  
Plaintiff/Movant, pro se

3536 Pacific Avenue, Apt. A5

Atlantic City, NJ 08401

(640) 281-0197

dTb33@PM.Me

**Tillerstead LLC**

**Honest Work • Built to Last**

**NJ Home Improvement Contractor #13VH10808800**

**www.tillerstead.com | (609) 862-8808 | info@tillerstead.com**

Sent with [Proton Mail](#) secure email.

On Monday, December 22nd, 2025 at 12:24 PM, Tillerstead LLC <info@tillerstead.com> wrote:

Mr. Warren,

Attached please find Plaintiff's limited Certification, provided as courtesy service and for record clarification only.

This Certification is submitted without argument and without waiver of any claims, defenses, or positions, all of which are expressly reserved.

Plaintiff does not seek relief by email.

Respectfully,

Devon Tyler Barber, pro se

**Tillerstead LLC**

**Honest Work • Built to Last**

**NJ Home Improvement Contractor #13VH10808800**

**www.tillerstead.com | (609) 862-8808 | info@tillerstead.com**

Sent with [Proton Mail](#) secure email.

On Monday, December 22nd, 2025 at 11:53 AM, Tillerstead LLC <info@tillerstead.com> wrote:

Mr. Warren,

Thank you for forwarding the proposed order.

Plaintiff understands that, at the conclusion of the December 22, 2025 hearing, the Court denied emergent relief and dismissed the action **without prejudice**. Plaintiff has no objection to entry of an order memorializing that ruling.

Plaintiff respectfully notes, however, that the **operative pleading** at the time of the Court's ruling was the **Amended Complaint filed on December 10–11, 2025**, and requests that any order entered accurately reflect the operative pleading and the **limited scope of the Court's disposition**—namely, a dismissal **without prejudice and without adjudication of the merits**.

For clarity of the record, nothing in this correspondence, nor in the proposed order, is intended to waive, concede, or adjudicate the merits of Plaintiff's claims. All substantive claims are expressly **reserved**,

including but not limited to claims concerning alleged unlawful escalation, use of force, property deprivation, and related due-process violations, whether asserted in this matter or in related civil actions or post-conviction proceedings.

This correspondence is provided solely to facilitate accurate memorialization of the Court's ruling and does not seek relief by email.

Thank you for your courtesy.

Respectfully,

/s/ Devon Tyler Barber

Devon Tyler Barber, Plaintiff, pro se

[info@tillerstead.com](mailto:info@tillerstead.com) and/or [dTb33@PM.Me](mailto:dTb33@PM.Me)

**Procedural Notice:**

This email is provided as courtesy correspondence regarding docketed proceedings. Nothing herein is intended to alter, waive, or expand any pleading, claim, defense, or position, all of which are governed exclusively by the filings of record and applicable New Jersey Court Rules.

Sent from [Proton Mail](#) for iOS.

----- Original Message -----

On Monday, 12/22/25 at 11:17 Kenneth Warren <[ken@leonardlawgroup.com](mailto:ken@leonardlawgroup.com)> wrote:

Per the Court's request, please find attached a proposed order for today's hearing in word format.

Thank you,

**Kenneth M. Warren Jr., Esq.**

**Partner**

**Leonard, Warren & Leonard, L.L.C.**

1200 Atlantic Avenue, Second Floor

Atlantic City, New Jersey 08401

Office: (609) 345-5800

Fax: (609)345-5870

[Ken@LeonardWarrenLeonard.com](mailto:Ken@LeonardWarrenLeonard.com)

<http://www.leonardwarrenleonard.com>

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On Mon, Dec 22, 2025 at 8:34 AM Barbara Moore <[barbara.moore@njcourts.gov](mailto:barbara.moore@njcourts.gov)> wrote:

Good Morning,

Received, thank you.

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**From:** Kenneth Warren <[ken@leonardlawgroup.com](mailto:ken@leonardlawgroup.com)>

**Sent:** Friday, December 19, 2025 5:44 PM

**To:** Barbara Moore <[barbara.moore@njcourts.gov](mailto:barbara.moore@njcourts.gov)>; Christine Jay <[christine.jay@njcourts.gov](mailto:christine.jay@njcourts.gov)>

**Cc:** [info@tillerstead.com](mailto:info@tillerstead.com)

**Subject:** [External] Return on OTSC (Barber v. HTPD, Dkt. ATL-L-3252-25)

### Warning: Security Alert

This message is from an external sender. Do not open any links or attachments unless you know and trust the sending email address.

Please report suspicious emails to [Security.infoSec@njcourts.gov](mailto:Security.infoSec@njcourts.gov).

Good Afternoon,

Please be advised that my office represents the Hamilton Township Police Department. Would you kindly find attached a courtesy copy of the filed Response to Plaintiff's OTSC scheduled for Monday, December 22nd.

Thank you,

**Kenneth M. Warren Jr., Esq.**

***Partner***

**Leonard, Warren & Leonard, L.L.C.**

1200 Atlantic Avenue, Second Floor

Atlantic City, New Jersey 08401

*Office:* (609) 345-5800

*Fax:* (609)345-5870

12/27/25, 8:48 AM

[Ken@LeonardWarrenLeonard.com](mailto:Ken@LeonardWarrenLeonard.com)  
<http://www.leonardwarrenleonard.com>

THE INFORMATION CONTAINED IN THIS ELECTRONIC MAIL IS ATTORNEY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INTENDED RECIPIENT NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR THE AGENT OF THE RECIPIENT AUTHORIZED TO OPEN IT AND DELIVER IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS ELECTRONIC MAIL IN ERROR, PLEASE NOTIFY US BY TELEPHONE AND DELETE THE ORIGINAL ELECTRONIC MAIL FROM YOUR SYSTEM. IF YOU HAVE PRINTED OUT THIS ELECTRONIC MAIL AFTER HAVING RECEIVED IT IN ERROR, PLEASE RETURN THE PRINTED VERSION TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE.

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**1.19 MB** 4 files attached

RECORD ORIENTATION INDEX.pdf 151.83 KB

Supplemental Certification and Certificate of Service.pdf 302.15 KB

ProposedSecondAmendedComplaintATL325225.pdf 202.98 KB

MotionLeaveSecondAmendedComplaintATL325225.pdf 562.18 KB

**DEVON TYLER BARBER,**  
Plaintiff/Movant, Pro Se  
3536 Pacific Avenue, Apt. A5  
Atlantic City, New Jersey 08401  
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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

**NOTICE OF MOTION FOR LEAVE TO**  
**FILE**

**SECOND AMENDED COMPLAINT**

*(R. 4:9-1; R. 4:26-4; R. 4:9-3)*

**TO: Kenneth M. Warren Jr., Esq.**  
**Leonard, Warren & Leonard, L.L.C.**  
**1200 Atlantic Avenue, Second Floor**  
**Atlantic City, New Jersey 08401**  
**Attorney for Defendant Township of Hamilton**

PLEASE TAKE NOTICE that on a date to be determined by the Court, Plaintiff Devon Tyler Barber, pro se, will move before the Superior Court of New Jersey, Law Division, Atlantic County, for an Order granting leave to file the attached **Second Amended Complaint**, pursuant to **R. 4:9-1**, **R. 4:26-4**, and **R. 4:9-3**.

This motion is supported by the accompanying **Certification of Devon Tyler Barber**, the **Proposed Second Amended Complaint**, and the **Proposed Form of Order**.

Respectfully,  
/s/ Devon Tyler Barber  
Plaintiff/Movant, Pro Se.

**DEVON TYLER BARBER,**  
Plaintiff/Movant, Pro Se  
3536 Pacific Avenue, Apt. A5  
Atlantic City, New Jersey 08401  
Telephone: (609) 862-8808  
Email: [dTb33@PM.Me](mailto:dTb33@PM.Me)

**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

**BRIEF IN SUPPORT OF MOTION FOR**  
**LEAVE TO FILE**

**SECOND AMENDED COMPLAINT**

1. **Good Cause and Liberal Standard.** Amendments should be freely granted in the interest of justice. R. 4:9-1. Plaintiff seeks leave in good faith to clarify parties and claims based on information obtained through discovery.
2. **Identification of Defendants Through Discovery.** The Second Amended Complaint substitutes named officers for previously pled fictitious defendants pursuant to **R. 4:26-4**, based on body-worn camera footage and related materials received after the First Amended Complaint was filed.
3. **Relation Back / No Prejudice.** The proposed amendments arise from the same occurrence and relate back under **R. 4:9-3**. Defendants will suffer no prejudice, as the Township is already represented, no discovery schedule has been set, and the amendments clarify—rather than expand—the factual core of the case.
4. **Judicial Economy.** Granting leave will streamline the litigation, ensure all proper parties are before the Court, and promote resolution on the merits rather than on technical pleading issues.

WHEREFORE, Plaintiff respectfully requests that the Court grant leave to file the attached **Second Amended Complaint**, and for such other relief as the Court deems just and equitable.

Date: December 27, 2025  
Respectfully submitted,  
**Devon Tyler Barber**  
Plaintiff/Movant, Pro Se.

**DEVON TYLER BARBER,**  
Plaintiff/Movant, Pro Se  
3536 Pacific Avenue, Apt. A5  
Atlantic City, New Jersey 08401  
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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**

**CERTIFICATION OF DEVON TYLER  
BARBER**

*(In Support of Motion for Leave)*

I, Devon Tyler Barber, certify as follows:

1. I am the Plaintiff in this matter and submit this Certification in support of my Motion for Leave to File a Second Amended Complaint.
2. After filing the First Amended Complaint on December 10, 2025, I received and reviewed discovery materials, including body-worn camera footage, which identified additional officers involved in the events of November 29, 2025.
3. The attached Second Amended Complaint substitutes those identified officers for previously pled fictitious defendants and clarifies claims arising from the same incident.
4. This motion is made promptly, in good faith, and for the purpose of resolving this matter on its merits. No party will be unfairly prejudiced by the requested amendment.

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

Date: December 27, 2025

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

**DEVON TYLER BARBER,**  
Plaintiff/Movant, Pro Se  
3536 Pacific Avenue, Apt. A5  
Atlantic City, New Jersey 08401  
Telephone: (609) 862-8808  
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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

**ORDER GRANTING LEAVE TO FILE**

**SECOND AMENDED COMPLAINT**

THIS MATTER having been opened to the Court by Plaintiff Devon Barber, pro se, on a Motion for Leave to File a Second Amended Complaint, and the Court having considered the papers submitted, and for good cause shown;

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2026,

**ORDERED** that Plaintiff's Motion is **GRANTED**; and it is further

**ORDERED** that the **Second Amended Complaint** attached to Plaintiff's motion is deemed filed as of the date of this Order; and it is further

**ORDERED** that Plaintiff shall serve the Second Amended Complaint in accordance with the New Jersey Rules of Court.

HON. \_\_\_\_\_, J.S.C.