

DEVON TYLER BARBER, Plaintiff, Pro Se
3536 Pacific Avenue, Apt. A5
Atlantic City, NJ 08401
(609) 862-8808 | info@Tillerstead.com

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION – ATLANTIC COUNTY

Devon Tyler Barber,
Plaintiff / Applicant,

v.

**Hamilton Township Police Department,
Township of Hamilton,
Dirkes Towing, Officer Ruiz (ID 0132),
Officer Merritt,
and John/Jane Doe Officers,
Defendants.**

DOCKET NO. ATL-L-003252-25

**SUPPLEMENTAL REQUEST FOR
ADDITIONAL RELIEF**

*(TO ACCOMPANY PLAINTIFF'S VERIFIED
SUPPLEMENTAL APPLICATION FOR
EMERGENT RELIEF)*

Plaintiff, Devon Tyler Barber, respectfully submits the following supplemental requests for additional relief. These requests are **narrow, non-prejudicial, and logically connected to the core constitutional and procedural issues** raised in the Application now before the Court.

The purpose of this supplemental request is to ensure that the record is complete, that evidence is preserved, and that Plaintiff's rights are protected while the Court considers the underlying constitutional claims.

1. Identification of All Officers and Supervisors Involved

Plaintiff respectfully requests that the Court order Defendants to disclose, within seven (7) days:

- the **full legal names**,
- **badge numbers**,
- **ranks**, and
- **specific roles**

of **every officer, supervisor, employee, agent, or trainee** who participated in:

- the Wawa encounter,

- the stop,
- the arrest,
- the decision to tow,
- booking-room processing,
- CAD/MDT queries,
- dispatch communications, and
- post-arrest handling of Plaintiff and his vehicle.

This identification is necessary for proper service, accurate pleadings, and preservation of claims under the NJ Civil Rights Act and 42 U.S.C. § 1983.

2. Evidence-Preservation (Litigation Hold) Order

To prevent loss of critical evidence through routine overwriting or deletion, Plaintiff requests that the Court impose a litigation hold requiring Defendants to preserve all materials related to the November 29, 2025 incident, including:

- body-worn camera footage,
- dash-camera footage,
- booking-room recordings,
- radio communications,
- CAD logs,
- MDT inquiries and lookup histories,
- internal-affairs notes or files,
- tow-company call sheets,
- chain-of-custody documentation, and
- photographs or videos taken by any officer or agent.

Such an order is routine and essential in constitutional tort matters.

3. Stay of Municipal-Court Proceedings

Plaintiff respectfully requests that the Court stay all municipal-court charges and proceedings arising out of the November 29, 2025 encounter pending resolution of the constitutional issues in this civil action.

The municipal charges stem from the same facts and raise threshold questions of:

- reasonable suspicion / probable cause,
- lawfulness of the arrest,
- validity of the MVC suspension,
- necessity of the tow, and
- accuracy of the police report(s).

A temporary stay prevents inconsistent rulings and protects Plaintiff's due-process rights.

4. Leave to File an Amended Complaint

Plaintiff requests leave to file an Amended Complaint within 30 days after receiving all impound records required by the Court's Order, including:

- impound notice,
- tow authorization,
- complete inventory,
- chain of custody,
- dispatch/CAD/MDT logs,
- identification of all officers, and
- body-worn / dash-camera materials.

This ensures accurate pleadings once information unlawfully withheld by Defendants is finally produced.

5. Certified Chain-of-Custody and Property Inventory

Because Plaintiff's vehicle contained essential work tools, PPE, equipment, clothing, documents, and other personal property, and Plaintiff has been denied access for over ten days, Plaintiff requests that the Court order:

- a **sworn chain-of-custody statement**
- and a **complete, itemized inventory**

from both HTPD and Dirkes Towing.

This protects Plaintiff's property rights and ensures any loss or damage can be properly litigated later.

Conclusion

These supplemental requests are minimally burdensome, necessary for the integrity of the proceedings, and directly related to the issues raised in Plaintiff's emergent application. Plaintiff respectfully asks that the Court grant the above relief in addition to the primary relief requested.

Respectfully submitted,

/s/ Devon Tyler Barber
Devon Tyler Barber, Plaintiff Pro Se
3536 Pacific Avenue, Apt. A5
Atlantic City, NJ 08401

Date: 12/10/2025