

DEVON TYLER BARBER, Plaintiff, Pro Se
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SUPERIOR COURT OF NEW JERSEY

LAW DIVISION, CIVIL PART

ATLANTIC COUNTY

DEVON TYLER BARBER,
Plaintiff / Applicant,

v.

**HAMILTON TOWNSHIP POLICE
DEPARTMENT;**
TOWNSHIP OF HAMILTON;
**DIRKES AUTO LLC d/b/a DIRKES
TOWING;**
**OFFICER EDWARD RUIZ (Badge No.
0132);**
OFFICER MERRITT (Badge No. ____);
and **JOHN/JANE DOE OFFICERS 1–10,**
Defendants.

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

CIVIL ACTION

SUPPLEMENTAL CERTIFICATION OF

DEVON TYLER BARBER

IN FURTHER SUPPORT OF ORDER TO
SHOW CAUSE

I, **Devon Tyler Barber**, of full age, certify pursuant to **R. 1:4-4** as follows:

1. I am the Plaintiff in this matter and the owner of the 2019 Volkswagen Passat, New Jersey registration **F35VLP** that is the subject of this action.
2. I incorporate by reference all prior Certifications and Affidavits I have filed in:
 - this Superior Court action; and
 - the municipal-court matter arising from the November 29–30, 2025 incident.
3. Since filing my **Verified Complaint and Order to Show Cause** on December 7, 2025, my vehicle continues to be held by **Dirkes Auto LLC / Dirkes Used Auto Parts** at the direction and for the benefit of Hamilton Township Police Department.

4. I have **not** been provided with:

- any tow authorization;
- any impound notice;
- any inventory sheet;
- any chain-of-custody documentation;
- any photographs or written assessment of the vehicle's condition; or
- any written explanation of the statutory or evidentiary basis for continued retention.

5. The **Atlantic County Prosecutor's Office** has confirmed in writing that it possesses **no 911 call, no CAD record, no dispatch log, and no call-for-service documentation** relating to the November 29–30, 2025 stop and impound of my vehicle.

6. The **Central Municipal Court discovery clerk** has confirmed that all discovery is held by **Hamilton Township Police Department**, and that the Prosecutor's Office is not maintaining separate investigatory files for this incident.

7. Despite my **R. 7:7-7 discovery request**, my Internal Affairs complaint, my OPRA requests, and my Emergency Motion in municipal court, I have received **no police reports, no CAD, no BWC, no dash-cam, and no tow or inventory documents** relating to the impoundment.

8. I remain **GA/EA indigent**, with no financial ability to pay towing or storage fees. Any continued accrual of fees is purely punitive and impossible for me to satisfy.

9. Since December 7, 2025, I have continued to suffer **ongoing, irreparable harm**:

(a) I have been unable to access **tools, work equipment, clothing, and personal effects** inside the vehicle that I need for my licensed tradesman work and daily living.

(b) My ability to accept and perform work as a tile installer and home-improvement tradesman is severely limited by the loss of my vehicle and tools.

(c) Although I now have a leased residence at **3536 Pacific Avenue, Apt. A5, Atlantic City**, my ability to maintain that housing is jeopardized by the loss of transportation and income.

(d) I remain unable to freely retrieve or transport items from my storage unit and other locations, and I have faced risks of losing stored property because I cannot reach or move it without my vehicle.

10. No one from HTPD, Dirkes, or any associated agency has offered a **less restrictive alternative**, such as allowing me to:

- retrieve the vehicle without fees;
- retrieve at least my tools and essential property; or
- place the vehicle at my residence while any civil dispute over fees is resolved.

11. The officers' conduct during the stop—including **contradictory commands, force used on my collar, shirt, and legs**, and the lack of a clear “under arrest” announcement before physical escalation—remains a key part of my concern. It appears that the decision to tow my vehicle was not based on a safety or evidence need, but was part of the overall escalation.

12. I certify that no forfeiture complaint, no application for a search or seizure warrant, and no judicial order has ever been served on me or, to my knowledge, filed to authorize continued retention of my vehicle.

13. Each day that passes with my vehicle detained:

- deepens my financial instability;
- interferes with my ability to sustain work;
- risks my housing stability; and
- deprives me of essential personal property that cannot be readily replaced.

14. I am prepared to immediately retrieve and safely park the vehicle at my residence if it is released, and I remain available to coordinate pickup, including arranging transportation to Dirkes if necessary.

15. I respectfully ask the Court to **grant the Order to Show Cause, enter temporary restraints, and direct the immediate release of my vehicle without fees**, as requested in my Verified Complaint, Brief, and this Supplemental Submission.

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

Dated: December 11th, 2025
Atlantic City, New Jersey

/s/ Devon Tyler Barber
Plaintiff, Pro Se