

SUPERIOR COURT OF NEW JERSEY
Law Division – Special Civil Part
Atlantic County

Date: 12/06/2025

Re: NJTA v. Barber

Docket ATL-DC-007956-25

Filing: Supplemental Motion to Compel Discovery / Opposition to Motion to Quash

To the Court Clerk:

Enclosed please find the following documents for filing in the above-referenced matter:

1. Notice of Motion
2. Certification of Plaintiff (R. 1:4-4)
3. Supplemental Statement of Reasons
4. Proposed Order
5. Certification of Service

Please file these materials and schedule the matter for the next available motion date. Kindly return a conformed copy to me by email at dTb33@ProtonMail.com

Respectfully,

/s/ Devon Tyler Barber

Plaintiff, Pro Se

(609) 862-8808

info@tillerstead.com

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

NEW JERSEY TURNPIKE AUTHORITY,

Plaintiff,

v.

DEVON T. BARBER,

Defendant and Counter-Claimant.

Docket No. ATL-DC-007956-25

NOTICE OF MOTION

TO: Counsel of Record VIA JEDS Email Submission FOR: New Jersey Turnpike Authority

PLEASE TAKE NOTICE that on the next available return date, Devon Tyler Barber, will move before the Superior Court of New Jersey, Law Division, Special Civil Part, Atlantic County, for an **Order**:

1. **Denying** Defendant's Motion to Quash Discovery;
2. **Granting** Plaintiff's Motion to Compel Discovery; and
3. **Awarding** such other relief as the Court deems equitable and just.

This motion is based upon the attached Certification, Supplemental Statement of Reasons, and Proposed Order.

A Proposed Form of Order is attached.

Respectfully submitted,

/s/ Devon Tyler Barber

Plaintiff, Pro Se
(609) 862-8808
info@tillerstead.com
Dated: 12/06/2025

**SUPERIOR COURT OF NEW JERSEY
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NEW JERSEY TURNPIKE AUTHORITY,

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CERTIFICATION OF DEFENDANT/COUNTER-CLAIMANT

(Pursuant to R. 1:4-4)

I, **Devon Tyler Barber**, of full age, certify as follows:

1. I am the Defendant and Counter-Claimant in this matter and I submit this Certification in support of my Supplemental Motion to Compel Discovery and in opposition to the New Jersey Turnpike Authority's Motion to Quash.
2. Although the NJTA characterizes this as a standard "debt-collection" matter, the issues presented here are materially different. The underlying facts involve:
 - a. administrative irregularities,
 - b. documented mail-delivery failures,
 - c. periods of housing instability,
 - d. significant economic hardship, and
 - e. the operation and accuracy of automated enforcement and billing systems.

These are not collateral concerns—they directly affect whether the alleged violations and the resulting administrative penalties are valid.

3. I did not receive toll notices, advisories, or administrative warnings in a timely manner due to disruptions in mail delivery and unstable housing circumstances. These conditions substantially impaired my ability to respond or cure the matter earlier.

4. The discovery I seek is narrow, proportional, and directly relevant to determining:

- a. whether the alleged toll violations actually occurred,
- b. whether the NJTA generated, addressed, and mailed required notices,
- c. whether administrative penalties were imposed in accordance with applicable rules, and
- d. whether any system, processing, or technology errors contributed to the disputed charges.

5. This information is uniquely within the NJTA's possession, custody, or control. Without it, I cannot meaningfully test the factual basis for the claims against me or prepare my defense.

6. I certify that the statements made herein are true to the best of my knowledge and belief. I understand that if any statement is willfully false, I am subject to punishment.

Respectfully submitted,

Devon Tyler Barber

Defendant / Counter-Claimant

/s/ Devon Tyler Barber

Date: 12/06/2025

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SUPPLEMENTAL STATEMENT OF REASONS

**IN OPPOSITION TO DEFENDANT'S MOTION TO QUASH AND IN
FURTHER SUPPORT OF PLAINTIFF'S MOTION TO COMPEL
DISCOVERY**

Plaintiff submits this supplemental statement to clarify why the requested discovery is not only relevant but necessary for a fair adjudication of this matter.

1. This is not a routine toll-collection dispute.

The NJTA treats this matter as routine. It is not.

The administrative fees at issue arose within a context of:

- unstable housing and disrupted mail access,
- economic hardship,
- rapid administrative-fee escalation,
- automated enforcement systems (camera and reader technology), and
- uncertainty over whether notices were actually mailed or delivered.

These circumstances affect the legality, accuracy, and enforceability of the alleged debt.

2. The requested discovery is directly tied to due process.

Under established New Jersey due-process principles and federal precedent such as Mathews v. Eldridge (verified authority), a person charged with escalating government fees must have:

- accurate notice,
- timely delivery,
- an opportunity to respond,
- and access to the underlying data the agency is relying on.

Without production of transaction logs, notice-issuance records, camera data, fee-calculation records, and related materials, Plaintiff cannot meaningfully respond.

3. Plaintiff's mental state and socioeconomic context matter in equitable relief.

While broad political or historical issues are not central here, the personal effects of homelessness, instability, injury, and economic pressure are relevant because they affected whether notice was reasonably calculated to reach Plaintiff and whether the fees are equitable.

New Jersey courts consistently consider hardship and equitable context in administrative-fee disputes.

4. NJTA's enforcement systems must be subject to challenge.

If the NJTA's automated systems misread a plate, failed to generate a notice, or generated duplicate penalties, Plaintiff is entitled to the data to verify those conditions.

The discovery requests are targeted precisely at that question — no more, no less.

5. Proportionality weighs in favor of production.

The documents sought are minimal, routine, and already in NJTA's possession.

They are not burdensome; they are standard toll-record materials.

Respectfully submitted,

Devon Tyler Barber

Defendant / Counter-Claimant

/s/ Devon Tyler Barber

Date: 12/06/2025

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

NEW JERSEY TURNPIKE AUTHORITY,

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PROPOSED ORDER

THIS MATTER having been brought before the Court on:

- (1) Plaintiff's Motion to Quash Discovery, and
- (2) Defendant/Counterclaimant's Motion to Compel Discovery,

and the Court having considered the submissions of the parties, and for good cause shown;

IT IS on this ____ day of _____, 2025,

ORDERED:

1. Plaintiff's Motion to Quash Discovery is hereby DENIED.
2. Defendant/Counterclaimant's Motion to Compel Discovery is hereby GRANTED.
3. Plaintiff, New Jersey Turnpike Authority, shall provide full and complete responses to Defendant/Counterclaimant's Interrogatories, Requests for Admissions, and Requests for Production of Documents, and shall produce all responsive documents within fourteen (14) days of the date of this Order.
4. The Court grants such other and further relief as is just and equitable.

SO ORDERED.

J.S.C.

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LAW DIVISION – SPECIAL CIVIL PART
ATLANTIC COUNTY**

NEW JERSEY TURNPIKE AUTHORITY,

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CERTIFICATE OF SERVICE

I certify that on 12/06/2025, I served the attached **Notice of Motion, certification, supplemental statement, and proposed order** with this **certificate of service** on

- Attorney of record

Attorney Email Address #1:
GKOTCHICK@DURKINLAWFIRM.COM

Attorney Bar ID: 027971999

- The Court (via eCourts)

by the following method(s):

Email, and;

JEDS eCourts Upload

I certify the foregoing is true.

/s/ Devon Tyler Barber

Date: 12/06/2025