

CLANCY FLEISHMAN, LLP
40 Wall Street, Suite 2506
New York, New York 10005
(917) 992-4550
Donna H. Clancy
Wendy R. Fleishman (*pro hac vice* anticipated)
Olivia M. Clancy
donna@thecflaw.com
wrf@thecflaw.com
omc@thecflaw.com

MICHAEL KALMUS, ESQ.
15 Boland Drive
West Orange, New Jersey 07052
(646) 298-5982
michaelkalmus@gmail.com

Attorneys for Plaintiff, "JOHN DOE"

_____X

"JOHN DOE" (A PSEUDONYM),
Plaintiff,

v.

CITY OF SECAUCUS, SECAUCUS POLICE
DEPARTMENT AND WALTER HURRELL,
Defendants.

SUPERIOR COURT OF NEW JERSEY
HUDSON COUNTY
LAW DIVISION

DOCKET NO.

CIVIL ACTION

COMPLAINT

_____X

Plaintiff "John Doe", by way of Complaint, says:

INTRODUCTION

Plaintiff, "JOHN DOE", a Pseudonym ("Plaintiff"), by and through his counsel, Clancy Fleishman, LLP and Michael Kalmus, Esq., complains of Defendants CITY OF SECAUCUS ("Secaucus"), SECAUCUS POLICE DEPARTMENT ("SPD") and WALTER HURRELL ("Hurrell") (collectively, "Defendants"), and alleges, upon information and belief, as follows:

NATURE OF THE ACTION

1. This action arises from the sexual abuse of Plaintiff, “John Doe” when he was a minor child, by Defendant Walter Hurrell, a sworn police officer employed by Defendants Secaucus Police Department and the City of Secaucus in Secaucus, New Jersey in or about the Fall of 1994. The sexual assault took place at in Secaucus, New Jersey at the residence of Defendant Hurrell.
2. In the fall of 1994, Defendant Hurrell exploited his position of authority, trust, access, and control as a law enforcement officer and supervisor employed by the City of Secaucus and the Secaucus Police Department (“SDP”) to sexually assault Plaintiff, then a 12-year-old boy.
3. At all relevant times, Defendant Hurrell was acting in his capacity as an employee, agent, and servant of Defendants Secaucus and the SPD and was acting under color of state law.
4. Plaintiff brings this action pursuant to the New Jersey Child Sexual Abuse Act, N.J.S.A. 2A:61B-1, *et seq.*, and New Jersey common law, seeking to hold Hurrell directly liable for his sexual abuse and to hold Secaucus and SPD vicariously and otherwise jointly liable for the acts of Defendants’ police officer, whose authority and position enabled the abuse of Plaintiff.

PARTIES

4. Plaintiff, “John Doe” is a pseudonym for an individual who was a minor at the time of the sexual abuse he suffered perpetrated by Defendant Walter Hurrell who currently resides in the State of New Jersey and is employed as a police officer with the Jersey City Police Department.
5. Plaintiff filed this Complaint as a pseudonym because of the severe and complex nature of his injuries, the extreme emotional distress he suffered and the risk of retaliatory physical or mental harm Plaintiff and to innocent non-parties referred to herein. These factors are sufficient to establish that a substantial privacy interest is involved, thereby warranting anonymity on the part of Plaintiff.
6. At the time of the abuse described herein, Plaintiff was a minor child, approximately 12-years-old, residing in Secaucus, New Jersey with his natural parents and guardians.

7. Defendant Walter Hurrell (“Hurrell”) is an individual who, at all relevant times, was a sworn police officer employed by Defendant Secaucus Police Department. Upon information and belief, Hurrell has since retired from the Secaucus Police Department.
8. Defendant City of Secaucus is a municipality organized and existing under the laws of the State of New Jersey.
9. Defendant Secaucus Police Department is, and at all relevant times was, an agency, department, affiliate, subsidiary, and/or political subdivision of Defendant City of Secaucus and was completely controlled by and under the authority of Defendant City of Secaucus.
10. At all relevant times, Defendants Secaucus and SPD employed Defendant Hurrell and were responsible for his hiring, training, supervision, retention, performance, and conduct.

JURISDICTION, VENUE, AND TIMELINESS

11. Plaintiff’s claims are timely pursuant to the New Jersey Child Sexual Abuse Act, including the revival and tolling provisions applicable to child sexual abuse claims.
12. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. §1332(a), as the amount in controversy exceeds \$75,000, exclusive of interest and costs, and there is complete diversity of citizenship between Plaintiff and Defendants.
13. Plaintiff John Doe is a citizen of the State of New Jersey.
14. Defendant City of Secaucus is a municipality organized under the laws of the State of New Jersey and is a citizen of the State of New Jersey for purposes of diversity jurisdiction.
15. Defendant Secaucus Police Department is an agency, department, and/or political subdivision of the City of Secaucus and is deemed a citizen of the State of New Jersey.
16. Defendant Walter Hurrell, upon information and belief, is domiciled in the State of New Jersey and is therefore a citizen of the State of New Jersey.

17. Venue is proper in this District pursuant to 28 U.S.C. §1391(b) because a substantial part of the events and omissions giving rise to Plaintiff's claims occurred within this District, including in Secaucus, New Jersey, and because Defendants are subject to personal jurisdiction in this District.
18. This Court has personal jurisdiction over Defendants because Defendants reside in, are domiciled in, conduct business in, and/or committed tortious acts within the State of New Jersey.
19. Plaintiff's claims are timely pursuant to the New Jersey Child Sexual Abuse Act, N.J.S.A. 2A:61B-1, *et seq.*, including the revival and tolling provisions enacted by the New Jersey Legislature and effective December 1, 2019.
20. New Jersey's Child Sexual Abuse Act expressly extends the statute of limitations for civil actions arising from sexual abuse of a minor, which Plaintiff was at the time of the sexual abuse and permits the commencement of previously time-barred actions based on sexual abuse.
21. The New Jersey Legislature further expanded the categories of potential defendants and expressly provided for the retroactive application of standards of liability to past acts of sexual abuse for which civil liability did not previously exist.
22. Plaintiff's claims are therefore *prima facie* timely under New Jersey law, and no statute of limitations bars this action.
23. Application of the New Jersey Child Sexual Abuse Act to the claims asserted herein is consistent with due process and serves the compelling public interest in providing justice to survivors of childhood sexual abuse and in holding perpetrators and responsible institutions accountable.

COMMON ALLEGATIONS

24. Plaintiff John Doe was raised in Secaucus, New Jersey by his parents.
25. At all relevant times, Plaintiff's mother was employed as a Police Dispatcher for Defendant Secaucus Police Department.

26. Defendant Hurrell was a sworn Police Officer employed by Defendant Secaucus Police Department and exercised supervisory authority within the department, including authority over Plaintiff's mother as a supervisor who could discipline her in her Police Dispatcher role.
27. From a young age, Plaintiff admired police officers, trusted them, and aspired to become a police officer himself. Plaintiff grew up with family members who served as Police Officers.
28. Plaintiff's admiration for law enforcement was reinforced by his mother's employment with Defendant Secaucus Police Department and by Defendant Hurrell's position of authority, stature, and trust within that department.
29. For a period of time prior to the incident described herein, Defendant Hurrell told Plaintiff's mother that he needed help cleaning underneath the deck surrounding his above-ground pool at his home.
30. Defendant Hurrell repeatedly asked Plaintiff's mother to send Plaintiff to his home to assist him with this work.
31. Defendant Hurrell made these requests while invoking, implicitly and explicitly, his authority and status as a Police Officer and supervisor within Defendant Secaucus Police Department.
32. Plaintiff's mother reasonably relied upon Defendant Hurrell's authority and position and asked Plaintiff whether he would help Defendant Hurrell with the requested work.
33. Plaintiff agreed to do so because he idolized Police Officers, trusted Hurrell as a Police Officer after meeting him at the Secaucus Police Department after school and the supervisor of his mother. Plaintiff met Defendant Hurrell within the police department on multiple occasions.
34. While at work at Defendant Secaucus Police Department, Plaintiff's mother acquiesced to Defendant Hurrell's request to bring her son to complete the work under his deck.

35. On the day in question, Plaintiff, then approximately 12-years-old, was dropped off at Defendant Hurrell's home to assist him with the requested work, and he was to be driven by Defendant Hurrell to Plaintiff's marching band practice at Secaucus High School.
36. Upon arriving at Defendant Hurrell's home, Plaintiff began assisting Defendant by climbing underneath the deck to remove garbage and debris that had accumulated there.
37. After Plaintiff had been working under the deck for a period of time, Defendant Hurrell instructed Plaintiff to stop and directed him to go inside the house.
38. Defendant Hurrell then directed Plaintiff into a room containing a desktop computer and displayed pornographic material to Plaintiff – only age 12 at this time.
39. Defendant Hurrell thereafter told Plaintiff that he was “dirty” and insisted that Plaintiff take a shower.
40. Defendant Hurrell then brought Plaintiff into his bedroom and instructed Plaintiff to undress.
41. Plaintiff complied but attempted to cover his genitals with his hands.
42. Defendant Hurrell forcibly pulled Plaintiff's hands away, exposed Plaintiff's genitals, and made demeaning, sexually charged statements intended to shame and humiliate Plaintiff and to undermine his sense of masculinity.
43. Defendant Hurrell then touched and fondled Plaintiff's genitals, including Plaintiff's penis and scrotum, with his hands.
44. Defendant Hurrell next directed Plaintiff into the bathroom and insisted that Plaintiff shower.
45. While Plaintiff was in the bathroom, Defendant Hurrell questioned Plaintiff about masturbation and sexual development, including questioning whether Plaintiff was capable of ejaculation, in a sexually explicit, inappropriate, and coercive manner.
46. Defendant Hurrell then turned on the shower, which had clear glass doors, and ordered Plaintiff to masturbate while in the shower.

47. Plaintiff, a minor child, complied with Defendant Hurrell's directives due to fear, confusion, coercion, and the authority Hurrell wielded as a police officer and supervisor of Plaintiff's mother.
48. During this time, Defendant Hurrell removed his own clothing, stood in the bathroom, and masturbated while watching Plaintiff.
49. Defendant Hurrell ejaculated in Plaintiff's presence.
50. After the sexual abuse concluded, Plaintiff exited the shower, got dressed, and prepared to leave.
51. Defendant Hurrell then drove Plaintiff to marching band practice at Secaucus High School in his personal vehicle.
52. Plaintiff did not consent to any of the sexual conduct described herein and was incapable of consenting as a matter of law.
53. Defendant Hurrell used his position of authority, trust, and control as a sworn police officer and supervisor within the Secaucus Police Department to groom Plaintiff, gain access to him, isolate him, and sexually abuse him.
54. Plaintiff did not disclose the abuse at the time due to fear, shame, confusion, trauma, and the overwhelming authority Defendant Hurrell held as a police officer and as a Supervisor over Plaintiff's mother.
55. Plaintiff did not disclose the abuse to his mother or others until he was approximately 18-years-old.
56. As a direct and proximate result of Defendant Hurrell's sexual abuse, Plaintiff suffered severe emotional distress, psychological trauma, anxiety, disordered eating, diminished self-worth, and long-lasting emotional injuries.
57. Despite the trauma inflicted upon him, Plaintiff ultimately fulfilled his childhood aspiration of becoming a police officer and is currently employed as a police officer with the Jersey City Police Department.

**COUNT I: SEXUAL BATTERY
(Against Defendant Walter Hurrell)**

57. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.
58. Defendant Hurrell intentionally inflicted unpermitted, harmful, and offensive sexual contact and sexual penetration upon Plaintiff, a minor child.
59. Plaintiff did not and could not consent to such sexual conduct.
60. Defendant Hurrell's conduct was willful, wanton, intentional, and malicious.
61. As a direct and proximate result of Hurrell's conduct, Plaintiff sustained severe physical, emotional, and psychological injuries.

WHEREFORE, Plaintiff demands judgment against Defendants herein for damages in an amount sufficient to compensate him for his compensatory damages, for both physical and emotional pain and suffering, for punitive damage, for costs of suit, for his attorneys fees and for such other relief as the Court finds equitable and just.

**COUNT II: VIOLATION OF THE NEW JERSEY CHILD SEXUAL ABUSE ACT
(N.J.S.A. 2A:61B-1, *et seq.*) (Against Defendant Walter Hurrell)**

62. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.
63. Defendant Hurrell committed acts constituting sexual abuse, sexual contact, and sexual penetration as defined by N.J.S.A. 2A:61B-1.
64. Defendant Hurrell's conduct entitles Plaintiff to recover compensatory damages, punitive damages, costs, and attorneys' fees as permitted by law.

WHEREFORE, Plaintiff demands judgment against Defendants herein for damages in an amount sufficient to compensate him for his compensatory damages, for both physical and emotional pain and suffering, for punitive damage, for costs of suit, for his attorneys fees and for such other relief as the Court finds equitable and just.

**COUNT III: FRAUDULENT MISREPRESENTATION/ABUSE
OF AUTHORITY (Against Defendant Walter Hurrell)**

65. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.
66. At all relevant times, Defendant Hurrell was a sworn police officer employed by the Secaucus Police Department and held a position of authority and trust over Plaintiff and Plaintiff's family.
67. In or about the Fall of 1998, Hurrell made material misrepresentations and omissions of fact to Plaintiff and Plaintiff's mother by representing, implicitly and explicitly, that he was acting within the scope of his lawful authority as a police officer and supervisor when he requested Plaintiff's presence at his home.
68. Hurrell further misrepresented and concealed the true purpose of his request by falsely portraying it as legitimate assistance or work, when in fact he intended to sexually abuse Plaintiff.
69. Hurrell knew these representations were false at the time they were made and made them with the intent that Plaintiff and Plaintiff's mother rely upon them.
70. Plaintiff's mother reasonably relied upon Hurrell's misrepresentations and abuse of authority in permitting Plaintiff to go to Hurrell's residence.
71. Plaintiff likewise reasonably relied upon Hurrell's representations and authority as a police officer and supervisor and complied with Hurrell's directives.
72. As a direct and proximate result of Hurrell's fraudulent misrepresentations and abuse of authority, Plaintiff was isolated and subjected to sexual abuse.
73. Defendant Hurrell's conduct was willful, wanton, intentional, and malicious, and constituted an abuse of official authority entrusted to him by Defendants Secaucus and SPD.
74. As a direct and proximate result of the foregoing, Plaintiff sustained severe emotional distress, psychological trauma, and other damages.

WHEREFORE, Plaintiff demands judgment against Defendants herein for damages in

an amount sufficient to compensate him for his compensatory damages, for both physical and emotional pain and suffering, for punitive damage, for costs of suit, for his attorneys fees and for such other relief as the Court finds equitable and just.

COUNT IV: VICARIOUS LIABILITY
(*RESPONDEAT SUPERIOR* / APPARENT AUTHORITY/AIDED-IN-AGENCY)
(Against Defendants City of Secaucus and Secaucus Police Department)

75. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.
76. At all relevant times, Hurrell was an employee and agent of Defendants Secaucus and SPD.
77. Defendants Secaucus and SPD cloaked Hurrell with actual and apparent authority, including the authority to supervise department personnel, to represent himself as a police officer acting on behalf of the municipality, and to invoke the trust of civilians and their families.
78. Defendant Hurrell was aided in accomplishing his wrongful acts by the existence of the agency relationship between himself and Defendants Secaucus and SPD, in that his supervisory authority over Plaintiff's mother enabled him to exert coercive pressure and obtain access to Plaintiff that would not otherwise have existed.
79. New Jersey law has adopted Restatement (Second) of Agency § 219(2)(d), which provides that a principal is vicariously liable for the torts of its servant acting outside the scope of employment when the servant was aided in accomplishing the tort by the existence of the agency relationship.
80. In the alternative, Defendants Secaucus and SPD are vicariously liable pursuant to Restatement (Third) of Agency § 7.08, which provides that a principal is subject to vicarious liability for a tort committed by an agent when actions taken with apparent authority enable the agent to commit or conceal the tort.
81. Defendant Hurrell used the authority and trust conferred upon him by Defendants Secaucus and SPD to gain access to Plaintiff through Plaintiff's mother, whom Hurrell supervised within the Secaucus Police Department.

82. But for Defendant Hurrell's position as a police officer and supervisor within the Secaucus Police Department, he would not have been able to obtain access to Plaintiff, isolate him, or accomplish the sexual abuse.
83. At all relevant times, Defendant Hurrell, while acting within the course of his employment and during work hours at the Police Department, initiated and engaged in a course of conduct designed to groom Plaintiff, a minor child, for subsequent abuse.
84. Defendant Hurrell repeatedly spoke to Plaintiff while Plaintiff was present at the Police Department visiting his mother, who was employed there, and used these interactions to establish familiarity, trust, and authority over Plaintiff.
85. Defendant also observed Plaintiff in and around the vicinity of the Police Department and on public streets, further cultivating his awareness of Plaintiff and reinforcing his position of authority and accessibility to Plaintiff.
86. These interactions were not isolated or incidental, but rather constituted a continuous course of grooming behavior, initiated and facilitated through Defendant's employment and workplace access.
87. Defendant's ability to identify, access, and groom Plaintiff was directly enabled by his employment as a police officer with the SPD and his supervisory role within the Department, which placed him in regular contact with Plaintiff and afforded him opportunities to interact with Plaintiff that would not have existed but for his employment.
88. The Secaucus Police Department served as the initial setting in which Defendant targeted and groomed Plaintiff, and Defendant used his position within that environment to cultivate trust, familiarity, and influence over Plaintiff, ultimately leading to the abuse.
89. Defendant Hurrell further used his position as a superior officer to make repeated requests that Plaintiff be sent to his home, and Plaintiff's mother reasonably believed that refusal would result in adverse employment consequences, thereby rendering her consent involuntary and coerced.

90. Defendants Secaucus and SPD failed to implement, develop, create, or enforce adequate policies, procedures, and safeguards to protect minor children from sexual abuse by police officers vested with authority and access.
91. Defendants Secaucus and SPD permitted Plaintiff, a minor child, to be present on its premises while visiting his mother, yet failed to implement or enforce adequate supervision, safeguards, or policies to protect Plaintiff, a minor, from inappropriate interactions with Hurrell.
92. Defendants Secaucus and SPD failed to exercise appropriate oversight, supervision, and control over Hurrell, thereby facilitating and enabling his sexual abuse of Plaintiff.
93. This failure created a foreseeable and unreasonable risk that a police officer, such as Defendant Hurrell, could exploit his position to initiate contact with, groom, and ultimately abuse a minor child present on Department premises without detention or intervention.
94. But for Defendant Hurrell's ability to interact with Plaintiff within the Police Department and to observe and engage with him in the course of his employment, Hurrell would not have been able to groom Plaintiff, gain his trust, or secure access to Plaintiff sufficient to commit the sexual abuse.
95. Defendant Hurrell's conduct was willful, wanton, intentional, and malicious, and constituted evil-minded acts accompanied by a wanton and willful disregard for Plaintiff's rights, interests, and welfare.
96. Defendant Hurrell's conduct was seriously harmful to the public, which has a compelling interest in ensuring that children are protected from sexual predators cloaked with law enforcement authority.
97. Defendants Secaucus and SPD are vicariously liable for Hurrell's intentional torts, including sexual battery and violation of the New Jersey Child Sexual Abuse Act.
98. Pursuant to Restatement (Second) of Torts § 909, Defendants Secaucus and SPD are subject to punitive damages for the acts of their agent, Hurrell.

WHEREFORE, Plaintiff demands judgment against Defendants herein for damages in an amount sufficient to compensate him for his compensatory damages, for both physical and emotional pain and suffering, for punitive damage, for costs of suit, for his attorneys fees and for such other relief as the Court finds equitable and just.

DAMAGES

99. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered severe emotional distress, psychological trauma, pain and suffering, diminished enjoyment of life, and other damages recognized by law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for compensatory damages, punitive damages, costs, attorneys' fees, interest, and such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

TRIAL COUNSEL DESIGNATION

Pursuant to Rule 4:25-4, Donna H. Clancy, Esq., has been designated as trial counsel on behalf of Plaintiff in the above-captioned matter.

DEMAND FOR INSURANCE INFORMATION

PURSUANT to Rule 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

() Yes () No

If the answer is "yes", attach a copy of each or in the alternative, state under oath or certification:

- (a) policy number;
- (b) name and address of insurer or issuer;
- (c) the inception and expiration dates;
- (d) names and addresses of all persons insured thereunder;
- (e) personal injury limits;
- (f) property damage limits;
- (g) medical payment limits;
- (h) name and address of person who has custody and possession thereof;
- (i) where and when each policy and agreement can be inspected and copied;
- (j) whether any Reservation of Rights has been asserted by the carrier and if so,

attach a copy of any such reservation.

CERTIFICATION

1. Pursuant to Rule 4:5-1, the undersigned hereby certifies that at the time of filing of this pleading, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding.

2. I also understand that at this time there are no other parties to my knowledge, that should be named in this lawsuit.

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

Respectfully submitted,

Donna H. Clancy /S
By: Donna H. Clancy, Esq.

Clancy Fleishman, LLP
40 Wall Street, Suite 2506
New York, New York 10005
(917) 992-4550
donna@thecflaw.com

Michael Kalmus /S
BY: Michael Kalmus, Esq.

MICHAEL KALMUS, ESQ.
15 Boland Drive
West Orange, New Jersey 07052
(646) 298-5982
michaelkalmus@gmail.com

Wendy Fleishman /S
By: Wendy Fleishman, Esq.

Clancy Fleishman, LLP
40 Wall Street, Suite 2506
New York, New York 10005
(917) 992-4550
wrf@thecflaw.com
(Pro Hac Vice anticipated)

/s/ Olivia M. Clancy

By: Olivia M. Clancy, Esq.

Clancy Fleishman, LLP
40 Wall Street, Suite 2506
New York, New York
10005 (917) 992-4550
omc@thecflaw.com

Dated: May 21, 2026

Civil Case Information Statement

Case Details: HUDSON | Civil Part Docket# L-002063-26

Case Caption: DOE JOHN VS CITY OF SECAUCUS

Case Initiation Date: 05/21/2026

Attorney Name: OLIVIA MARIE CLANCY

Firm Name: CLANCY FLEISHMAN LLP

Address: 40 WALL STREET, SUITE 2506
NEW YORK NY 10005

Phone: 2127471744

Name of Party: PLAINTIFF : JOHN DOE

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: JOHN DOE? YES

Plaintiff's date of birth: 04/26/1986

Est. date of first incident of abuse: 01/01/1994

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO
Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

05/21/2026
Dated

/s/ OLIVIA MARIE CLANCY
Signed

