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**Via eCOURTS, ELECTRONIC & OVERNIGHT MAIL**

Supreme Court of New Jersey  
Attn: Honorable Michael J. Blee, J.A.D.  
Acting Administrator Director of the Courts  
Richard J. Hughes Justice Complex  
25 Market Street  
Trenton, New Jersey 08601

**Re: *In Re: Daniel's Law Compliance Litigations,*  
Application for Multi-County Litigation Designation or Transfer to a Single  
Vicinage for Coordination**

Dear Judge Blee:

We represent plaintiffs Atlas Data Privacy Corporation (“Atlas”)<sup>1</sup> and several individuals (together, the “Plaintiffs”) in 111 cases currently proceeding in the Superior Court, Law Division, in seven (7) counties—Bergen, Essex, Mercer, Middlesex, Monmouth, Morris and Union—which are enumerated in the list attached as Exhibit A.<sup>2</sup> In each of these suits, Plaintiffs seek to hold a data broker accountable for unlawfully disclosing the home addresses and unpublished home telephone numbers of Covered Persons in violation of New Jersey’s Daniel’s Law. Plaintiffs may have no choice but to file several hundred more actions in the coming months if other data brokers are determined to be non-compliant with the law.

To reduce the burden on the courts and facilitate the just and efficient resolution of these important cases involving the privacy and security of public servants, Plaintiffs respectfully request that the Daniel’s Law actions filed by Atlas: (a) be classified as Multi-County Litigation pursuant to Rule 4:38A (Centralized Management of Multicounty Litigation) and Multicounty Litigation Guidelines (Revised) [As Promulgated by Directive# 02-19 Pursuant to Rule 4:38A]; or

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<sup>1</sup> Atlas, in turn, is the assignee of the claims of tens of thousands of active, formerly active, or retired law enforcement officers, prosecutors, judges, and their family members who are “Covered Persons” as defined in Daniel’s Law.

<sup>2</sup> Plaintiffs’ counsel also includes Boies Schiller Flexner LLP; Bird, Marella, Rhow, Lincenberg, Drooks & Nessim, LLP; Friedman Kaplan Seiler Adelman & Robbins LLP; Porzio, Bromberg & Newman, P.C.; and Stern Kilcullen & Rufolo, LLC.

(b) be transferred to a single Vicinage and assigned to a single judge for coordinated case management.

As set forth below, Plaintiffs believe that these Daniel’s Law cases should be classified as Multi-County Litigation and transferred to the Law Division, Complex Business Litigation Program in Essex County for coordination and case management because (1) the highest number of actively litigated matters are there; (2) the Court there has assigned all matters to one judge for consistency and judicial efficiency; and (3) it is the most convenient location for the parties and counsel, most of whom are either from Essex or neighboring counties, from New York City, or from outside of the New Jersey/New York/Philadelphia Metropolitan regions. Plaintiffs alternatively propose that the matters be transferred to a single judge in Mercer or Middlesex County for similar reasons. We met and conferred with coordinating counsel in the Superior Court matters for Defendants last week, but do not anticipate that all Defendants will agree with Plaintiffs’ proposal at this time<sup>3</sup>.

## **BACKGROUND**

### **Daniel’s Law—Purpose and Requirements**<sup>4</sup>

Daniel’s Law<sup>5</sup> was enacted in response to a targeted attack on U.S. District Judge Esther Salas which resulted in the shooting of her husband Mark and the murder of their son, Daniel Anderl, at their New Jersey home. Our Supreme Court has recognized that the protection of Covered Persons—including judges, prosecutors, law enforcement officers, child protective investigators, and their families—is a state interest of “the highest order.” Kratovil v. City of New Brunswick, 261 N.J. 1, 26 (2025) (“New Jersey’s interest in protecting public officials from [ ] threats and thus ensuring that they may carry out their duties without fear of harm to themselves or their families is clearly a state interest of the highest order.”); see also N.J.S.A. 56:8-166.3; Atlas Data Privacy Corp. v. We Inform, LLC, 758 F. Supp. 3d 322, 337 (D.N.J. 2024) (“Daniel’s Law . . . serves a need to further a state interest of the highest order”).

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<sup>3</sup> While Plaintiffs initially intended to file this application last week, we anticipated and engaged in additional communications with Defendants. Coordinating counsel for Defendants have advised that it would likely take a week to respond to Plaintiffs after receipt of this written proposal. As such, Plaintiffs are filing same and will continue to confer with Defendants to the extent they are willing to agree to any component of Plaintiffs’ application.

<sup>4</sup> See, e.g. Final Opinion and Order on Default Judgment in Atlas Data Privacy Corporation, et al. v. Cole Information Services, Inc., et al., (Law Div. Sept. 19, 2025, Docket No.: ESX-L-7209-24 (citations omitted)).

<sup>5</sup> See P.L. 2020, c. 125, codified at N.J.S.A. § 56:8-166.1; N.J.S.A. § 47:1A-1.1; N.J.S.A. § 47:1B 1; N.J.S.A. § 2C:20-31.1.

Daniel's Law confers a legal right on Covered Persons and their families to shield their home addresses and unpublished home telephone numbers from disclosure. To invoke their rights under the statute, a Covered Person must send a written notification, which starts a statutory ten-business-day compliance period. N.J.S.A. 56:8-166.1(a)(1). After the compliance period has run, any act of disclosure,<sup>6</sup> re-disclosure, or "otherwise making available or viewable within a searchable list or database" constitutes a violation of the Covered Person's rights under the statute. To make Daniel's Law effective—and enforceable—for Covered Persons and their families, the law authorizes Covered Persons to assign causes of action that arise under the statute to organizations like Atlas to help enforce their rights.

### **Current Status of Daniel's Law Compliance Actions**

This application concerns 111 currently pending cases<sup>7</sup> in the Superior Courts of New Jersey and additional lawsuits<sup>8</sup> that may be filed by Plaintiffs to ensure compliance with Daniel's Law ("Daniel's Law Compliance Actions"). Each suit alleges that the defendant(s) violated Daniel's Law by disclosing, re-disclosing, or otherwise making available the Plaintiffs' home addresses and/or unpublished home telephone numbers more than ten business days after receipt of nondisclosure requests from thousands of New Jersey Covered Persons. Each of these actions seeks to protect these Covered Persons from repeated disclosures by data brokers motivated by profit and commercial gain, who continue to defy New Jersey law and who have or continue to put public servants and their families at risk.

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<sup>6</sup> Daniel's Law defines "disclose" to mean "to solicit, sell, manufacture, give, provide, lend, trade, mail, deliver, transfer, post, publish, distribute, circulate, disseminate, present, exhibit, advertise, or offer, and shall include making available or viewable within a searchable list or database, regardless of whether a search of such list or database is actually performed." N.J.S.A. 56:8-166.1(d).

<sup>7</sup> There are 52 cases that were originally filed in various Vicinages but were removed by those defendants to the United States District Court for the District of New Jersey on diversity jurisdiction grounds. These removed matters are all assigned to the Hon. Harvey Bartle III, U.S.D.J. for case management and coordination in Federal Court. In addition, Plaintiffs have dismissed 8 matters pursuant to settlements, and have voluntarily dismissed 5 other matters. The federal matters as well as the settled/dismissed matters are not included in the figures herein.

<sup>8</sup> While there are many companies that complied with the nondisclosure requests delivered through Atlas's platform, there are several hundred more who traffic in personal information of Covered Persons who may not be in compliance, but have not yet been sued for violations of the law. Several of those actions will likely be filed within the next 90 days. Plaintiffs believe that all such matters should similarly be assigned to a single Judge and Vicinage for coordination with these matters.

Daniel's Law Compliance Actions  
Currently Pending in the Superior Courts of New Jersey

<i>County</i>	<i>Cases in Active Litigation<sup>9</sup></i>	<i>Cases in Default Posture<sup>10</sup></i>	<i>Total Pending Matters</i>	<i>Cases in Active Settlement Discussions<sup>11</sup></i>	<i>Cases in Active Litigation (non-settlement)</i>
<i>Essex</i>	<i>15</i>	<i>3</i>	<i>18</i>	<i>2</i>	<i>13</i>
<i>Bergen</i>	<i>14</i>	<i>9</i>	<i>23</i>	<i>5</i>	<i>9</i>
<i>Morris</i>	<i>13</i>	<i>6</i>	<i>19</i>	<i>3</i>	<i>10</i>
<i>Monmouth</i>	<i>12</i>	<i>1</i>	<i>13</i>	<i>5</i>	<i>7</i>
<i>Middlesex</i>	<i>12</i>	<i>1</i>	<i>13</i>	<i>5</i>	<i>7</i>
<i>Mercer</i>	<i>11</i>	<i>5</i>	<i>16</i>	<i>2</i>	<i>9</i>
<i>Union</i>	<i>5</i>	<i>4</i>	<i>9</i>	<i>1</i>	<i>4</i>
<b><i>Total</i></b>	<i>82</i>	<i>29</i>	<i>111</i>	<i>23</i>	<i>59</i>

<sup>9</sup> Cases in Active Litigation include multiple cases where the Administrative Office of the Courts has entered a notice of dismissal or has dismissed a matter for lack of prosecution, potentially in error, and Plaintiffs have requested the case be reinstated. See, e.g., Atlas v. Spokeo, Docket No. MRS-L-000227-24. This has been an issue that several assigned Judges have had to handle—administrative dismissals—despite court orders regarding scheduling and briefing superseding responsive pleading deadlines. These administrative dismissals have resulted in additional motion practice and submissions. This is another, albeit minor, example of why coordination by a single judge would create efficiencies for the parties and the court.

<sup>10</sup> Cases in Default Posture include cases where defendants are eligible for entry of default, where default has been entered by the court, or where a final judgment by default has been entered but the court has retained jurisdiction.

<sup>11</sup> In the 82 Cases in Active Litigation, Plaintiffs are engaged in settlement discussions with almost two dozen defendants. Some of those matters are being mediated by the Hon. Douglas J. Arpert, U.S.M.J. (retired).

### **Atlas's Role in Daniel's Law Compliance Actions**

Atlas's technology platform provides Covered Persons the tools to assert their privacy rights under Daniel's Law. Upon signing up for Atlas's platform, a Covered Person is asked a series of questions to collect required personal information and verify their eligibility as a Covered Person under Daniel's Law. Once eligibility is confirmed, each Covered Person receives their own AtlasMail email account, with a unique inbox address (e.g., john.doe23@atlasmail.com) for their personal use. Each Covered Person is then presented with a page on which they can review the home addresses and unpublished home telephone numbers they entered into the platform, a nondisclosure request template, and a list of recommended data brokers to which they may wish to send nondisclosure requests. The Covered Person is solely responsible for the selection of data brokers, if any, to whom they will send nondisclosure requests through the Atlas platform.

The Covered Persons in these Daniel's Law Compliance Actions sent separate written nondisclosure requests to each defendant data broker and then (except for the individual plaintiffs), as the result of non-compliance, assigned their claims against that data broker defendant to Atlas so that in turn, Atlas could enforce the Covered Person's rights through litigation. The assignment component of the law allows for efficiency of litigation on behalf of thousands of hard-working law enforcement officers, prosecutors, judges, and their family members through direct action for assigned claims. This ability to assign claims serves a critical role in the efficient enforcement of Daniel's Law, where thousands of individuals would otherwise be forced to individually identify potential violators and individually seek compliance, resulting in hundreds of thousands of separate lawsuits. Assignment is an important part of the enforcement mechanism for Daniel's Law by allowing Covered Persons to meaningfully enforce their rights and supports the proposed transfer of these matters to a single Vicinage to streamline legal issues, discovery, and related matters for additional efficiency.

### **CENTRALIZED MANAGEMENT IS APPROPRIATE**

Rule 4:38A and the Multicounty Litigation Guidelines support centralized management of these civil actions. In determining whether designation is warranted, the New Jersey Supreme Court considers the following factors, among others:

(1) whether the cases involve:

- (i) large numbers of parties;
- (ii) many claims with common, recurrent issues of law and fact associated with a single product, mass disaster, or complex tort;
- (iii) a geographical dispersement of parties;
- (iv) a high degree of commonality of injury or damages among plaintiffs;
- (v) value interdependence between claims; and
- (vi) remoteness between the court and actual decision-makers in the litigation;

- (2) whether there is a risk that centralization may unreasonably delay the progress, increase the expense, or prejudice a party;
- (3) whether centralized management is fair and convenient to the parties, witnesses, and counsel;
- (4) whether there is a risk of duplicative and inconsistent rulings, orders or judgments if the cases are not managed in a coordinated fashion;
- (5) whether coordinated discovery would be advantageous; and
- (6) whether centralization would result in the efficient utilization of judicial resources and the facilities and personnel of the court.

All of these factors favor coordination of these matters in a single Vicinage or designating these suits as a Multicounty Litigation. It is indisputable that these actions raise substantially similar legal and factual issues, including without limitation, determinations regarding liability, damages, and injunctive relief. Without centralized management, the courts and the parties face the risk of duplicative discovery, inconsistent rulings at the trial court level, multiplicity of appeals, and the unnecessary expenditure of resources.

**1. These Actions Involve a Large Number of Parties, Commonality of Injuries and Damages Among Plaintiffs, and Recurrent Issue of Law and Fact**

To begin, all the Daniel's Law Compliance Actions involve virtually identical plaintiffs and a large number of claims—based on the same causes of action under Daniel's Law, based on similar facts—assigned to Atlas. Each action was initiated by Atlas, as assignee for approximately 19,000 Covered Persons, as well as individual Plaintiffs Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, Peter Andreyev, and/or William Sullivan. The cases involve a large number of defendants, too. In each case, the defendant is a person, association, or company that profits from the disclosure, re-disclosure, or otherwise making available of protected personal information subject to Daniel's Law. The assignors and Plaintiffs are geographically dispersed throughout New Jersey, and the defendants in these actions are located in a variety of states and countries. For that reason, there is some degree of remoteness between any particular Vicinage and the actual decision-makers in the litigation, and decisions typically pass through layers of local, regional, and national outside defense counsel, as well as each defendant's in-house counsel or management team. Defendants have been coordinating among themselves as a joint-defense group across Vicinages and several counsel have been informally designated or identified as lead or coordinating defense counsel.

These cases also exhibit a high degree of commonality of injury and damages suffered by the Plaintiffs. In each case, Plaintiffs assert claims under Daniel's Law for actual or liquidated damages, punitive damages, attorneys' fees and injunctive relief. And in each case, Plaintiffs allege that substantially the same group of Covered Persons submitted written nondisclosure requests to the defendant, but the defendant nonetheless disclosed, re-disclosed, or otherwise made

available the home addresses and/or unpublished home telephone numbers of these Covered Persons, inflicting the same privacy injury, and threatening all of them with similar risks of harassment and violence.

Further, the claims asserted in these cases uniformly involve common, recurrent issues of law and fact that are associated with disclosures made by data brokers after Daniel's Law went into effect. Among other things, the claims implicate questions of law regarding (i) the constitutionality of the statute as applied to data brokers under the First Amendment and Article I, ¶¶ 6 & 18, of the New Jersey Constitution; (ii) federal preemption under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*, and Section 230 of the Communications Act of 1934, as amended by the Communications Decency Act of 1996, 47 U.S.C. § 230, among others; (iii) personal jurisdiction over out-of-state defendants who disclosed data subject to Daniel's Law; (iv) questions of statutory interpretation regarding terms and provisions in the statute;<sup>12</sup> and (v) the calculation of actual or liquidated damages under Daniel's Law. There are a myriad of other legal issues common across the cases regarding assignability, liability standards, equitable relief, prospective remedies and a number of affirmative defenses.

Factually, while there may be some questions specific to each defendant, generally, these cases involve common questions regarding the defendants' receipt and processing of nondisclosure requests, the adequacy and reasonableness of the defendants' procedures and controls for compliance with Daniel's Law, and other factual questions that arise from the application of the statute to data brokers.<sup>13</sup> In addition, the factual and legal questions posed to Plaintiffs and the assignors across matters are similar, if not identical. Because all of the claims depend on the resolution of these common questions, there is at least some degree of value interdependence between the claims. These common questions of law and fact should be resolved by a single judge to avoid duplicative motion practice, inconsistent rulings, and unnecessary and piecemeal appeals.

The fact that there are numerous defendants does not undermine the centrality of common questions of law and fact, nor preclude transfer and coordination or an MCL designation. For example, our Supreme Court recently ordered cases with numerous different defendants and alleged bad actors to be centralized in In re Allegations of Sexual Abuse in Juvenile Detention Facilities Operated by the State of New Jersey (hereinafter In re Allegations of Sexual Abuse

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<sup>12</sup> See *infra* at pg. 12 for a discussion on a question of statutory interpretation that has already been answered differently by different judges.

<sup>13</sup> In discussing the federal and state standards for consolidation, the court in Martino v. Mazie noted that the MCL Guidelines do not require "that multicounty cases have the "same facts" or "substantially identical liability issues," but rather that the cases "need have only common, not identical, liability issues to be consolidated." 2022 WL 1443689, at \*7 (D.N.J. May 6, 2022).



MCL).<sup>14</sup> The fact that different alleged abuses were allegedly carried out by scores of different offenders at a dozen different facilities did not override the benefits of coordinated management where there were core issues of law and fact across all the cases. Similar principles apply here.

Consideration of overlapping recurring issues of law and fact outweighs the relatively marginal distinct issues of law or fact that some defendants may raise as an impediment to centralization. As the Federal Judicial Panel on Multidistrict Litigation has reasoned, although some individualized factual issues may arise, such issues do not negate the efficiencies to be gained by centralization. See In re: National Prescription Opiate Litigation, Docket No. 1:17-md-02804 (N.D. Ohio Nov. 04, 2022) (centralizing actions against numerous opiate manufacturer-and distributor-defendants because all actions implicated common fact questions as to the defendants' violations of the Controlled Substances Act); see also In re: FTX Cryptocurrency Exchange Collapse Litigation, Docket No. 1:23-md-03076 (S.D. Fla. Jun 05, 2023) (centralizing actions against non-overlapping defendants that would raise defendant-specific issues because the "common factual core warrant[ed] centralization despite the involvement of a number of different defendants"); In re Acetaminophen – ASD/ADHD Prods. Liab. Litig., 637 F. Supp. 3d 1372, 1374 (U.S. Jud. Pan. Mult. Lit. 2022) (centralizing actions against ten retailer-defendants because the presence of some retailer-specific factual issues was not significant where the actions arose from a common factual core); In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, Docket No. 4:22-md-03047 (N.D. Cal. Oct 06, 2022) (centralizing actions against five distinct social media defendants whose platforms and user interfaces operated differently because common issues overlapped all actions, and all defendants were likely to assert the same defenses).

Moreover, despite there being numerous defendants, they have already categorized themselves as falling into a few groups based on the type of service they provide, such as people search providers, reverse phone lookup providers, consumer reporting agencies or property information or real estate services, thus recognizing that they have many more similar attributes in connection with this litigation than differences.

And, many of these defendants have already interposed defenses in motions to dismiss. Those motions raised the same, relatively few, common issues. Thus, the first factor weighs heavily in favor of transferring these matters to a single Vicinage as requested.

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<sup>14</sup> See Allegations of Sexual Abuse at State-Operated Juvenile Detention Facilities Application, <https://www.njcourts.gov/sites/default/files/mcl/sexual-abuse-in-juvenile-detention-facilities-operated-by-the-state-of-new-jersey/application.pdf>.



## **2. Centralization Will Not Unreasonably Delay the Progress, Increase the Expense, or Prejudice the Parties**

Centralization will expedite the resolution of these cases, reduce expenses, and will not prejudice any party. If these actions proceed independently in separate counties, the parties will be forced to engage in duplicative motion practice and repetitive discovery disputes while laboring under inconsistent scheduling orders, which will increase expenses and inefficiency for all involved. As is, the parties face discovery, deposition notices, and competing deadlines across these 111 Daniel's Law Compliance Actions. Already, the cases have produced merits and discovery motion practice that raise the exact same issues across multiple counties and courts. Those courts are already inquiring as to how the others have analyzed and ruled on the same issues. In addition, these lawsuits have already led to—and invariably will lead to—more appeals. There is no reason that the appellate court should get embroiled in a labyrinth of appeals about the same issues.

Uniform discovery and case management will reduce the risk of duplicative motion practice and inconsistent rulings on these issues and the expense for the courts and the parties. See In re Phenylpropanolamine (PPA) Products Liability Litigation, 460 F.3d 1217, 1231 (9th Cir. 2006) (observing that when similar cases are coordinated for pretrial purposes, those cases are more likely to proceed toward resolution on the merits with less burden and expense overall than if each were litigated separately). For example, in Mercer County, defendants in 7 matters submitted a joint motion to dismiss on the common issues of law, with some parties then submitting supplemental motions to dismiss based on specific issues with respect to that defendant. The same occurred in Monmouth County, where defendants in 7 matters also submitted a joint motion to dismiss on the common issues of law, followed by some supplemental briefing on issues specific to each defendant. This approach saved each court time and resources, as it only needed or will need to address a single brief on the common issues. It is important to note that many of the legal issues raised in these types of coordinated submissions are also common across Vicinages, thus allowing for even greater efficiency for the court and the parties by having all of these matters handled by a single judge.

Similarly, with respect to discovery, in 5 cases in Monmouth County, the parties agreed that defendants would serve coordinated written discovery requests to plaintiffs and permitted each defendant to serve supplemental requests to the extent that they sought additional discovery from plaintiffs. Both plaintiffs and defendants benefited from this arrangement; each defendant did not need to propound individualized discovery on the common requests, and plaintiffs had to respond to those common requests once. Such a practice could be applied across all cases whether already pending or yet to be filed. A similar approach was taken in Bergen County where many cases are formally consolidated for discovery purposes. The current process, however, is far from ideal, with each Vicinage creating different deadlines resulting in each tackling similar legal issues and disputes. It cannot be reasonably contested that the current processes could be significantly streamlined through centralized management of these matters in a single Vicinage.

Indeed, across dozens of cases, plaintiffs and defendants are engaged in common disputes about the same categories of documents to be produced. To the extent these disputes must be resolved through motion practice, coordination would allow the parties to submit a single brief on those common issues, potentially followed by supplemental briefing on any case-specific issues, and a single ruling from the court for all parties. To the extent the court or parties wish to engage a special discovery adjudicator, having common discovery issues adjudicated uniformly meets the interests of justice and efficiency, and reduces issues on appeal.

This approach has already been utilized with success in federal court. There, common disputes arose about the scope of personal jurisdiction discovery across 16 cases. Judge Bartle ordered plaintiffs to submit a single motion to compel, and a single reply brief, and defendants to submit individualized opposition briefs, if desired. Judge Bartle then issued a single order that applied in all 16 cases, with common and consistent rulings across multiple defendants. Such an approach could be applied across all 111 cases in state court.

We believe that centralization here can operate efficiently using the principles and guidelines of the Manual for Complex Litigation (Fourth), as applied in the In re Allegations of Sexual Abuse MCL. Were the court to order these cases designated as multicounty litigation for centralized case management by a single judge, they could be managed in a similar manner as that MCL, or however the trial judge felt was appropriate under the circumstances. All parties could appear at the same status conference. All parties could receive notice of all activity in the MCL. The court could issue one order concerning interim measures such as discovery of computer-based information and electronically stored information, preservation of records, protective orders and document depositories. Discovery disputes could be handled through a coordinated meet and confer and court conference process. The assigned judge would then become familiar and proficient with the recurring relevancy, burden, and scope of discovery issues. Other pre-trial issues and dispositive motions could be managed in the same way.

Defendants will not be prejudiced by centralization, either. As noted above, Defendants are already working together across multiple counties, and have developed common arguments and strategies for dealing with most issues. Centralization will reduce the burden on Defendants in briefing motions on common issues of law and fact and in responding to Plaintiffs' discovery requests because agreements and disagreements as to the scope and extent of discovery can be handled and adjudicated through a coordinated and efficient processes among the parties and the court. In addition, matters of law that are the subject of appeal can be consolidated before the appellate division for efficiency in briefing and determinations.

Coordination on appeal has already seen efficiency in a facial constitutional challenge to Daniel's Law that is before the U.S. Court of Appeals for the Third Circuit. There, 67 Federal Court Defendants filed a joint motion to dismiss challenging the facial constitutionality of Daniel's Law. The New Jersey Attorney General intervened in those matters and submitted briefing on behalf of the State applicable to all matters. Judge Bartle reviewed the coordinated briefing, held

one oral argument, and issued a decision applicable to all cases. The decision was certified for appeal, and another single set of briefs were filed with the Third Circuit, which also conducted a single, coordinated oral argument in July of this year.

Recently, the Third Circuit certified questions to the New Jersey Supreme Court, which accepted a reformulated question and similarly ordered coordinated briefing. Transfer and coordination of these matters will necessarily take into account the pending decision from the New Jersey Supreme Court on the certified questions posed by the Third Circuit Court of Appeals. The alternative—and the current posture of the Superior Court matters—would be dozens of sets of briefing on different schedules, but on the same legal issues.

Transfer and coordination of these matters will also, as discussed below, mitigate any potential contradictory rulings, and would allow for the appointment of a special discovery adjudicator across all of the cases to resolve discovery disputes uniformly. This would not only streamline the discovery dispute resolution process, it would also split the cost of the adjudicator across a large number of parties, as opposed to two. Transfer and coordination will also permit scheduling of certain bellwether cases for trial before others have completed discovery and dispositive motion practice, if the assigned judge believes such trials are appropriate.

### **3. Centralized Management is Fair and Convenient to the Parties, Witnesses, and Counsel**

Centralized management would also be fair and convenient for parties, witnesses, and counsel. As explained, centralized management will spare the parties duplicative motions, inconsistent rulings, and unnecessary appeals. Centralization will also eliminate the need for duplicative deposition testimony for any fact and expert witnesses whose testimony is likely to be relevant across cases, reducing the burden on parties, witnesses, and counsel. Further, geographic centralization will increase convenience for the attorneys for both sides because the same firms represent all Plaintiffs, and many of Defendants' counsel represent multiple defendants in different counties.<sup>15</sup>

To this end, Plaintiffs believe Essex County is most convenient because a plurality of New Jersey counsel have offices in Essex County. In addition, there are over 50 attorneys already admitted pro-hac vice in all of these matters from out of state, with offices a short distance to Essex County (e.g., in New York City) or accessible via a flight to Newark Airport. Along with those lawyers, dozens of additional out-of-state attorneys have been part of conferences or discussions among counsel, or are involved in some material way. The Assigned Judge in Essex County has

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<sup>15</sup> There are over 20 law firms representing defendants in multiple cases, with one firm representing defendants in 11 cases, 2 firms each representing defendants in 6 cases, 1 firm representing defendants in 5 cases, and so on. One firm, for example, is representing defendants in cases in 4 different counties, Bergen, Mercer, Monmouth, and Essex.

already handled a multitude of conferences and motion practice on these matters, including motions to dismiss for failure to state a claim and related to personal jurisdiction, discovery-related disputes, and even a default judgment hearing, with determinations by the Court in favor of both plaintiffs and defendants. As such, Plaintiffs respectfully submit that centralized management of these matters in Essex County will be fair and convenient to the parties, witnesses, and all counsel.

Plaintiffs have put forth both Middlesex and Mercer Counties as alternative counties for assignment of these matters for similar issues of convenience, case management and knowledge of the Court of issues in these matters.

#### **4. There are Risks of Duplicative and Inconsistent Rulings, Orders and Judgments If the Actions Are Not Managed in a Coordinated Fashion**

Centralization of these cases is crucial to prevent conflicting rulings and avoid piecemeal litigation. Without centralization, there is an acute risk that courts in different counties will issue conflicting rulings on the common questions of law and fact identified above, common discovery issues and evidentiary questions, and issues regarding damages and injunctive relief. See, e.g., Union Cnty. Improvement Auth. v. Artaki, LLC, 392 N.J. Super. 141, 147 (App. Div. 2007) (holding that “consolidation should be granted to promote judicial economy and avoid inconsistent rulings....”). This risk of inconsistent rulings threatens prejudice to all parties, and litigating the same issues in multiple counties undermines judicial economy.

Indeed, different judges within the same Vicinages have already made conflicting legal rulings on the scope of Daniel’s Law, specifically, whether a product offered by multiple defendants—a “reverse lookup” tool—violates Daniel’s Law. Judge McMann in Morris County opined that such a product does violate Daniel’s Law. See April 23, 2025 Order and Hearing Transcript denying defendant’s motion to dismiss in Atlas Data Privacy Corp. v. Twilio, Inc., No. MRS-L-226-24. However, Judge Romankov, also in Morris County, found that such a product does not violate Daniel’s Law. See Atlas Data Privacy Corporation, et al. v. Telnyx, LLC, Docket No.: MRS-L-260-24.<sup>16</sup> This question is now pending before Judge Petrillo in Essex County in yet another case, with other defendants indicating that they intend to seek similar relief in other Vicinages.

#### **5. Coordinated Discovery Would Be Advantageous**

Coordinated discovery would clearly be advantageous for all parties, given that the claims and defenses asserted in these suits will rely on similar discovery. As noted, there has already been significant motion practice and court conferences about the exact same issues raised and adjudicated in other cases. In connection with the motions and conferences, different courts have

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<sup>16</sup> This decision, which was entered without prejudice, is subject to a motion for reconsideration filed by Plaintiffs that is fully briefed and pending argument and determination.

already asked about what has occurred in sister courts. The same issues regarding how defendants have disclosed the protected information, where they procured the protected information, how they received nondisclosure requests and what they did to prevent disclosure after receipt of a request arises in virtually every action. Every defendant also asks for similar discovery from Plaintiffs, such as how Atlas operates, how and when Covered Persons sent their nondisclosure requests, details on Covered Persons and how Atlas interacted with the Covered Persons, etc. All of these issues are uniform across cases and can be resolved by one judge.

Coordinated discovery would allow the court to enter general discovery and protective orders, as well as order consolidated depositions when appropriate, reducing duplication and costs for all parties. It is worth noting that discovery involves the protected information—the names, home addresses and unpublished home telephone numbers—of approximately 19,000 current or former New Jersey law enforcement officers, judges, prosecutors and their families. Ensuring the protection and privacy of that information is sacrosanct in privacy suits such as these matters.

Coordinated discovery will also spare fact and expert witnesses, including witnesses from Atlas and other non-parties, from testifying dozens of times in these cases to address the same issues, and obviate the need for the same expert discovery amongst all cases. See In re Aetna UCR Litig., No. 07-CV-3541, 2020 WL 13580932 at \*1 (D.N.J. Aug. 25, 2020) (the reasoning for the consolidation of cases is to “preclude[e] parties from being subject to and propounding duplicative discovery.”). Coordinated discovery will also allow for the appointment of a special discovery adjudicator, as discussed above. And, coordination will allow the court to assign certain matters for mediation to attempt resolution in advance of significant expenditures on protracted litigation.

## **6. Centralization Would Result in the Efficient Utilization of Judicial Resources**

It is indisputable that centralization of these matters will result in more efficient use of judicial resources. The judge designated to coordinate these cases will be able to manage discovery, briefing on dispositive motions, and hearings on major motions in a way that reaches uniform rulings of common legal and factual questions, and produces coordinated solutions for discovery issues. The parties can attend hearings at one location on one date. Appeals can be consolidated and streamlined through the appellate courts as opposed to engendering scores of appellate dockets at different times and with different appellate panels. See In re Aetna, 2020 WL 13580932 at \*2 (“The goal of the multidistrict litigation process is to ‘promote the just and efficient conduct’ of ‘civil actions involving one or more common questions of fact’ that are pending in different districts.”) (citing In re Asbestos Prods. Liab. Litig., 718 F.3d 236, 243 (3d Cir. 2013)). And, because the same Plaintiffs have 53 Daniel’s cases currently pending in the United States District Court for the District of New Jersey, centralization will facilitate coordination with a single New Jersey judge as needed.

### **STRUCTURE OF COORDINATION**

For these reasons, Plaintiffs respectfully submit that centralized management in a single Vicinage of these suits by a single judge is appropriate under R. 4:38A. While these matters are not the traditional mass-tort cases with a large number of plaintiffs and few defendants, the benefits of transfer and coordination with a few plaintiffs and a large number of defendants equally apply. As noted above, Plaintiffs propose that the cases be consolidated in Essex, Middlesex, or Mercer County.<sup>17</sup> because there are a significant number of cases already pending there and those Vicinages are convenient for the parties and counsel:

1. Essex County: 18 of these suits are currently pending in Essex County, and a single judge is already presiding over those cases and has applied the Complex Business Litigation track rules to all of the matters. In addition, as noted above, a plurality of New Jersey counsel involved are located in Essex County and most non-New Jersey counsel are located either a short distance to Essex County in New York City or can conveniently access flights via Newark Airport.
2. Middlesex County: 13 of these suits are currently pending in Middlesex County, and a single judge is already presiding over those cases and coordinating briefing and other issues. Middlesex County is similarly central for many of the New Jersey counsel appearing in these matters.
3. Mercer County: 16 of these suits are currently pending in Mercer County, and a single judge is already presiding over those cases.

### **ALTERNATIVELY, THESE ACTIONS SHOULD BE TRANSFERRED TO ONE VENUE**

If the New Jersey Supreme Court determines that these suits are not appropriate for designation as Multicounty Litigation, Plaintiffs request in the alternative that the Court, by virtue of the Chief Justice's role as the administrative head of all New Jersey state courts<sup>18</sup>, order that these actions be transferred to a single venue, and assigned to a single judge for case-management coordination. Rule 4:38-1 permits consolidation when actions involve "a common question of law or fact arising out of the same transaction or series of transactions" even if those matters should be tried separately. As explained, these suits involve numerous common questions of law and fact. These suits also arise from a similar transaction or series of transactions, namely, Defendants'

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<sup>17</sup> To the extent the Court looks beyond the suggested Counties, Bergen County is the next rational choice given location and the number of active cases in that Vicinage that are all currently assigned to a single judge.

<sup>18</sup> See N.J. Const. Art. VI, § VII; see also State v. Linares, explaining that the Chief Justice has the power to "promulgate binding directives either directly or through the Administrative Office of the Courts." 192 N.J. Super. 391, 397 (Law Div. 1983).



disclosures of information subject to Daniel's Law after receiving nondisclosure requests from these Plaintiffs beginning in February 2024. For clarity, any such consolidation would be for discovery purposes only, as each of the matters likely will need to be tried separately.

The same factors that support designation of these cases as Multicounty Litigation also support transfer of these suits to a single venue and designation of a single judge for case management coordination. Consolidation for discovery purposes is appropriate when, as here, it would promote efficiency, avoid duplicative proceedings, and reduce the risk of inconsistent rulings without unfairly prejudicing any party. See Union Cnty. Improvement Auth. v. Artaki, LLC, 392 N.J. Super. 141, 147–48 (App. Div. 2007). And, although venue was properly laid in each of these suits, “venue requirements are not jurisdictional ... rather they are rules of practice designed to place litigation at a location convenient to parties and witnesses.” State, Dep’t of Env’tl Prot. v. Middlesex Cty. Bd. of Chosen Freeholders, 206 N.J. Super. 414, 420 (Ch. Div. 1985). Thus, courts may exercise “discretion” in transferring venue when consolidation is warranted and may “select venue on the basis of fairness after a consideration of all facts.” McFadden v. Nagle, No. BER-L-000829-21 (Law Div. Jun. 11, 2021) (quoting Robert T. Winzinger, Inc. v. Brennan Bros., Inc., 191 N.J. Super. 114, 119 (Law Div. 1983)).

### **CONCLUSION**

For these reasons, Plaintiffs respectfully request that these suits be designated as Multicounty Litigation and assigned to a designated judge in Essex County (or elsewhere) for centralized management pursuant to R. 4:38A and the Multicounty Litigation Guidelines. Designation of these actions as Multicounty Litigation will ensure the fair, efficient and consistent administration of these cases. Centralization will prevent inconsistent rulings, streamline discovery, and conserve judicial resources.

Please note that a Notice to the Bar regarding this application will appear in the New Jersey Law Journal and in the Multicounty Litigation Information Center on the Judiciary's Internet website providing information on where and within what time period comments on and objections to the application may be made.

Respectfully submitted,

**PEM LAW LLP**

/s/ Rajiv D. Parikh  
RAJIV D. PARIKH

- c: Chief Justice Stuart Rabner (via overnight mail)  
All Assignment Judges in Relevant Counties (via overnight mail)  
All Civil Presiding Judges in Relevant Counties (via overnight mail)



Hon. Michael J. Blee, J.A.D.  
November 3, 2025  
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All Assigned Judges (via eCourts and overnight mail)  
Administrator Director of the Courts (via overnight mail)  
Counsel of Record (via eCourts and electronic mail to coordinating counsel)  
New Jersey Attorney General's Office (via eCourts and electronic mail)

Enclosures

# **EXHIBIT A**

#	Matter Name	Docket Number	Vicinage	Judge	Default Pending	Defendants' Attorney (Firm)
1	Atlas v. Amsive, LLC	BER-L-000918-24	Bergen	John D. O'Dwyer		Akerman LLP
2	Atlas v. Atdata, LLC	BER-L-000867-24	Bergen	John D. O'Dwyer		Troutman Pepper Hamilton Sanders LLP
3	Atlas v. Boundary Solutions, Inc.	BER-L-000793-24	Bergen	John D. O'Dwyer	Default Pending	
4	Atlas v. Claritas	BER-L-000868-24	Bergen	John D. O'Dwyer	Default Pending	Gordon, Rees, Scully & Mansukhani, LLP
5	Atlas v. Corelogic, Inc.	BER-L-000773-24	Bergen	John D. O'Dwyer		Troutman Pepper Hamilton Sanders LLP
6	Atlas v. Costar Group, Inc.	BER-L-000770-24	Bergen	John D. O'Dwyer		Latham & Watkins, LLP
7	Atlas v. Enformion	BER-L-000767-24	Bergen	John D. O'Dwyer		Troutman Pepper Hamilton Sanders LLP
8	Atlas v. Equifax, Inc.	BER-L-000919-24	Bergen	John D. O'Dwyer		King & Spalding LLP, Clark Hill PLC
9	Atlas v. Lusha Systems, Inc.	BER-L-000814-24	Bergen	John D. O'Dwyer	Default Pending	Gordon, Rees, Scully & Mansukhani, LLP
10	Atlas v. Main Street Response LLC d/b/a ID True	BER-L-000855-24	Bergen	John D. O'Dwyer	Default Pending	
11	Atlas v. MyLife.com, Inc.	BER-L-000768-24	Bergen	John D. O'Dwyer	Default Pending	
12	Atlas v. National Search Association	BER-L-000866-24	Bergen	John D. O'Dwyer	Default Pending	
13	Atlas v. OfficialUSA	BER-L-000849-24	Bergen	John D. O'Dwyer	Default Pending	
14	Atlas v. OnXmaps, Inc.	BER-L-000813-24	Bergen	John D. O'Dwyer		Dorsey & Whitney LLP
15	Atlas v. Precisely Holdings, LLC	BER-L-000819-24	Bergen	John D. O'Dwyer		Troutman Pepper Hamilton Sanders LLP
16	Atlas v. RE/MAX, LLC	BER-L-000871-24	Bergen	John D. O'Dwyer		Kelley Drye & Warren LLP
17	Atlas v. Sagewire Research, LLC	BER-L-000869-24	Bergen	John D. O'Dwyer		Leopold Law, LLC
18	Atlas v. Social Catfish, LLC	BER-L-000769-24	Bergen	John D. O'Dwyer		The Chilla Business Counsel, LLC, Internet Law Center

#	Matter Name	Docket Number	Vicinage	Judge	Default Pending	Defendants' Attorney (Firm)
19	Atlas v. Swordfish AI, Inc.	BER-L-000794-24	Bergen	John D. O'Dwyer		Manatt, Phelps & Phillips, LLP
20	Atlas v. Sync.me Technologies, Ltd.	BER-L-000822-24	Bergen	John D. O'Dwyer	Default Pending	Barnes & Thornberg, LLP
21	Atlas v. Transunion, LLC	BER-L-000810-24	Bergen	John D. O'Dwyer		Buchanan Ingersoll & Rooney PC
22	Atlas v. Unmask, LLC	BER-L-000815-24	Bergen	John D. O'Dwyer		The Chilla Business Counsel, LLC, Kronenberger Rosenfeld LLP
23	Atlas v. USPhoneSearch.com	BER-L-000970-24	Bergen	John D. O'Dwyer	Default Pending	
24	Atlas v. Babel Street, Inc.	ESX-L-007260-24	Essex	Stephen L. Petrillo		Covington & Burling LLP
25	Atlas v. Calleridtest.com	ESX-L-003310-25	Essex	Stephen L. Petrillo		Klein Moynihan
26	Atlas v. CellRevealer.com	ESX-L-003309-25	Essex	Stephen L. Petrillo		
27	Atlas v. Cole Information Services, Inc.	ESX-L-007209-24	Essex	Stephen L. Petrillo	Default Pending	
28	Atlas v. Constella Intelligence, Inc.	ESX-L-007212-24	Essex	Stephen L. Petrillo		Kaufman Dolowich LLP
29	Atlas v. DrivenIQ Corporation	ESX-L-007211-24	Essex	Stephen L. Petrillo	Default Pending	
30	Atlas v. EmailTracer.com	ESX-L-003307-25	Essex	Stephen L. Petrillo		
31	Atlas v. Leak-lookup.com	ESX-L-008330-25	Essex	Stephen L. Petrillo		
32	Atlas v. Microbilt Corporation	ESX-L-003308-25	Essex	Stephen L. Petrillo		Hudson Cook, Montgomery McCracken Walker & Rhoads
33	Atlas v. njtaxrecords.net	ESX-L-003303-25	Essex	Stephen L. Petrillo		
34	Atlas v. PeekYou LLC	ESX-L-003299-25	Essex	Stephen L. Petrillo		Dunnington Bartholow & Miller LLP
35	Atlas v. Pentester LLC	ESX-L-008352-25	Essex	Stephen L. Petrillo		
36	Atlas v. publicdatausa.com	ESX-L-003318-25	Essex	Stephen L. Petrillo		

#	Matter Name	Docket Number	Vicinage	Judge	Default Pending	Defendants' Attorney (Firm)
37	Atlas v. Realpeoplesearch.com	ESX-L-008332-25	Essex	Stephen L. Petrillo		
38	Atlas v. Realtyhop.com	ESX-L-008331-25	Essex	Stephen L. Petrillo		
39	Atlas v. SnusBase.com	ESX-L-003302-25	Essex	Stephen L. Petrillo	Default Pending	
40	Atlas v. USA-Official.com	ESX-L-003326-25	Essex	Stephen L. Petrillo		
41	Atlas v. Vonage Holdings Inc.	ESX-L-007208-24	Essex	Stephen L. Petrillo		Latham & Watkins, LLP
42	Atlas v. Acxiom, LLC	MER-L-000283-24	Mercer	Douglas H. Hurd		Troutman Pepper Hamilton Sanders LLP
43	Atlas v. Adstra, LLC	MER-L-000311-24	Mercer	Douglas H. Hurd		Venable LLP
44	Atlas v. Attom Data Solutions, LLC	MER-L-000273-24	Mercer	Douglas H. Hurd		Traub Lieberman
45	Atlas v. Besthistorysites.net	MER-L-002292-25	Mercer	Douglas H. Hurd		
46	Atlas v. Black Knight Technologies, Inc.	MER-L-000271-24	Mercer	Douglas H. Hurd		McCarter & English, LLP
47	Atlas v. Cocofinder	MER-L-000319-24	Mercer	Douglas H. Hurd	Default Pending	
48	Atlas v. Dynata, LLC	MER-L-000308-24	Mercer	Douglas H. Hurd		Manatt, Phelps & Phillips, LLP
49	Atlas v. Hiya, Inc.	MER-L-000285-24	Mercer	Douglas H. Hurd		Vedder Price P.C.
50	Atlas v. Lightbox Parent, L.P.	MER-L-000309-24	Mercer	Douglas H. Hurd		Latham & Watkins, LLP
51	Atlas v. Lucky2Media, LLC	MER-L-000286-24	Mercer	Douglas H. Hurd	Default Pending	
52	Atlas v. Previlon, LLC	MER-L-000294-24	Mercer	Douglas H. Hurd	Default Pending	
53	Atlas v. SCSD Holdings, LLC	MER-L-000299-24	Mercer	Douglas H. Hurd	Default Pending	
54	Atlas v. TelephoneDirectories	MER-L-000335-24	Mercer	Douglas H. Hurd	Default Pending	

#	Matter Name	Docket Number	Vicinage	Judge	Default Pending	Defendants' Attorney (Firm)
55	Atlas v. The Lifetime Value Co. LLC (Beenverified)	MER-L-000272-24	Mercer	Douglas H. Hurd		McCarter & English, LLP, Hogan Lovells US LLP
56	Atlas v. Valassis Digital Corp.	MER-L-000290-24	Mercer	Douglas H. Hurd		Saul Ewing LLP, Loeb & Loeb LLP, Manatt, Phelps & Phillips, LLP
57	Atlas v. Whitepages, Inc.	MER-L-000270-24	Mercer	Douglas H. Hurd		Vedder Price P.C.
58	Atlas v. 6Sense Insights, Inc.	MID-L-000988-24	Middlesex	Bruce J. Kaplan		Clark Hill PLC
59	Atlas v. First American Financial Corporation	MID-L-000915-24	Middlesex	Bruce J. Kaplan		Montgomery McCracken Walker & Rhoads, Hudson Cook
60	Atlas v. Giant Partners, Inc.	MID-L-000989-24	Middlesex	Bruce J. Kaplan		The Chilla Business Counsel, LLC
61	Atlas v. Glad I Know Inc.	MID-L-000850-24	Middlesex	Bruce J. Kaplan	Default Pending	
62	Atlas v. Infopay, Inc.	MID-L-000815-24	Middlesex	Bruce J. Kaplan		Constangy, Brooks, Smith & Prophete, LLP
63	Atlas v. Insidere, LLC	MID-L-000991-24	Middlesex	Bruce J. Kaplan		Morgan, Lewis & Bockius LLP
64	Atlas v. NJ Property Records, LLC	MID-L-000811-24	Middlesex	Bruce J. Kaplan		Law Offices of Elliott Malone, Esq., LLC
65	Atlas v. Outside Interactive, Inc.	MID-L-000849-24	Middlesex	Bruce J. Kaplan		Gordon, Rees, Scully & Mansukhani, LLP
66	Atlas v. OWMN, LTD.	MID-L-000992-24	Middlesex	Bruce J. Kaplan		Orloff, Lowenbach, Stifelman & Siegel, P.A.
67	Atlas v. Radaris, LLC	MID-L-000847-24	Middlesex	Bruce J. Kaplan		Arseneault & Fassett LLC; Boston Law Group
68	Atlas v. RevealName	MID-L-000901-24	Middlesex	Bruce J. Kaplan		Pro se
69	Atlas v. Teltech Systems, Inc. (Epic Enterprises)	MID-L-000859-24	Middlesex	Bruce J. Kaplan		Carlton Fields
70	Atlas v. Verisk Analytics, Inc.	MID-L-000903-24	Middlesex	Bruce J. Kaplan		McCarter & English, LLP

#	Matter Name	Docket Number	Vicinage	Judge	Default Pending	Defendants' Attorney (Firm)
71	Atlas v. Batchservice LLC	MON-L-000485-24	Monmouth	Owen C. McCarthy		Manatt, Phelps & Phillips, LLP
72	Atlas v. CheckPeople, LLC	MON-L-000506-24	Monmouth	Owen C. McCarthy		The Chilla Business Counsel, LLC, Kronenberger Rosenfeld LLP
73	Atlas v. Data Axle, Inc.	MON-L-000483-24	Monmouth	Owen C. McCarthy		Koley Jessen P.C., LLO, Tressler LLP
74	Atlas v. Epsilon Data Management	MON-L-000533-24	Monmouth	Owen C. McCarthy		Faegre Drinker Biddle & Reath LLP, Croke Fairchild Duarte & Beres
75	Atlas v. LTRAC, LLC	MON-L-000694-24	Monmouth	Owen C. McCarthy		Constangy, Brooks, Smith & Prophete, LLP
76	Atlas v. Neighbor.Report	MON-L-000537-24	Monmouth	Owen C. McCarthy	Default Pending	
77	Atlas v. People Data Labs, Inc.	MON-L-000515-24	Monmouth	Owen C. McCarthy		Starr, Gern, Davison & Rubin P.C., ZwillGen PLLC
78	Atlas v. Peopleconnect, Inc.	MON-L-000484-24	Monmouth	Owen C. McCarthy		Latham & Watkins, LLP, O'Toole Scrivo, LLC
79	Atlas v. PIPL, Inc.	MON-L-000481-24	Monmouth	Owen C. McCarthy		Kublanovsky Law, LLC, Dart Law
80	Atlas v. Red Violet, Inc.	MON-L-000482-24	Monmouth	Owen C. McCarthy		Troutman Pepper Hamilton Sanders LLP
81	Atlas v. Search Quarry, LLC	MON-L-000516-24	Monmouth	Owen C. McCarthy		Clark Hill PLC
82	Atlas v. Specialists Marketing Services, Inc.	MON-L-000539-24	Monmouth	Owen C. McCarthy		Gordon, Rees, Scully & Mansukhani, LLP
83	Atlas v. Wiland, Inc.	MON-L-000577-24	Monmouth	Owen C. McCarthy		Dentons US LLP
84	Atlas v. 411.Info Corp.	MRS-L-000229-24	Morris	Jennifer McAndrew-Vuotto	Default Pending	
85	Atlas v. AGR Group, Inc.	MRS-L-000483-24	Morris	Jennifer McAndrew-Vuotto		Freeman Mathis & Gary, LLP
86	Atlas v. Blackbaud, Inc.	MRS-L-000243-24	Morris	Jonathan W. Romankow		Carlton Fields, Parker Poe Adams & Bernstein LLP
87	Atlas v. CallerSmart, Inc.	MRS-L-000237-24	Morris	Frank DeAngelis	Default Posture	



#	Matter Name	Docket Number	Vicinage	Judge	Default Pending	Defendants' Attorney (Firm)
88	Atlas v. Carco Group, Inc.	MRS-L-000270-24	Morris	Jonathan W. Romankow		Troutman Pepper Hamilton Sanders LLP
89	Atlas v. Clustrmaps	MRS-L-000256-24	Morris	Frank DeAngelis	Default Pending	
90	Atlas v. Commercial Real Estate Exchange	MRS-L-000271-24	Morris	Jonathan W. Romankow		Dentons US LLP
91	Atlas v. Databaseusa.com LLC	MRS-L-000230-24	Morris	Jonathan W. Romankow	Default Pending	
92	Atlas v. dehashed.com	MRS-L-000242-24	Morris	Stephan C. Hansbury	Default Pending	
93	Atlas v. Information.com LLC	MRS-L-000245-24	Morris	Jonathan W. Romankow		Wade Clark Mulcahy LLP, Kronenberger Rosenfeld LLP
94	Atlas v. LocatePLUS Holdings Corp.	MRS-L-000247-24	Morris	Jonathan W. Romankow	Default Pending	
95	Atlas v. REIPro, LLC	MRS-L-000231-24	Morris	Jennifer McAndrew-Vuotto		Brinen & Associates, LLC
96	Atlas v. Remine, Inc.	MRS-L-000258-24	Morris	Jonathan W. Romankow		Troutman Pepper Hamilton Sanders LLP
97	Atlas v. Skopenow, Inc.	MRS-L-000241-24	Morris	Jonathan W. Romankow		Flanagan Barone O'Brien
98	Atlas v. Spokeo, Inc.	MRS-L-000227-24	Morris	Jennifer McAndrew-Vuotto		Sills Cummis & Gross P.C., Mayer Brown LLP
99	Atlas v. SpyCloud, Inc.	MRS-L-000263-24	Morris	Jennifer McAndrew-Vuotto		Baker & Hostetler LLP
100	Atlas v. Telnix, LLC	MRS-L-000260-24	Morris	Jonathan W. Romankow		McCarter & English, LLP
101	Atlas v. Thryv, Inc.	MRS-L-000261-24	Morris	Jonathan W. Romankow		Sheppard Mullin Richter & Hampton, LLP
102	Atlas v. Twilio, Inc.	MRS-L-000226-24	Morris	Jennifer McAndrew-Vuotto		Orrick, Herrington & Sutcliffe LLP, O'Toole Scrivo, LLC
103	Atlas v. FindPeopleSearch, LLC	UNN-L-001740-25	Union	Mark P. Ciarrocca		Lomurro Munson, LLC
104	Atlas v. KB Synergy Holdings, Inc.	UNN-L-001731-25	Union	Mark P. Ciarrocca	Default Pending	Allen, Mitchell & Allen PLLC
105	Atlas v. numlooker.com	UNN-L-001744-25	Union	Mark P. Ciarrocca		

#	Matter Name	Docket Number	Vicinage	Judge	Default Pending	Defendants' Attorney (Firm)
106	Atlas v. Skip Force LLC	UNN-L-001734-25	Union	Mark P. Ciarrocca	Default Pending	Allen, Mitchell & Allen PLLC
107	Atlas v. Skip Genie LLC	UNN-L-001735-25	Union	Mark P. Ciarrocca	Default Pending	Quadros, Migl & Crosby
108	Atlas v. SkipSmasher LLC	UNN-L-001736-25	Union	Mark P. Ciarrocca	Default Pending	
109	Atlas v. TopHap, Inc.	UNN-L-001747-25	Union	Mark P. Ciarrocca		Constangy, Brooks, Smith & Prophete, LLP
110	Atlas v. Trestle Solutions, Inc.	UNN-L-001737-25	Union	Mark P. Ciarrocca		Baker & Hostetler LLP
111	Atlas v. Validnumber.com	UNN-L-001738-25	Union	Mark P. Ciarrocca		