SETON HALL UNIVERSITY SCHOOL OF LAW
CENTER FOR SOCIAL JUSTICE
EQUAL JUSTICE LITIGATION CLINIC
833 McCarter Highway
Newark, New Jersey 07120

Jenny-Brooke Condon, Esq.
NJ Attorney ID: 025912003
Professor of Law
Equal Justice Clinic, Director
(973) 642-8700
Jenny-Brooke.Condon@shu.edu

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Supreme Court of New Jersey
Office of the Clerk
Richard J. Hughes Justice Complex
PO Box 970
Trenton, NJ 08625-0970
Attn: Yuri P. Albertao, Case Manager

Re: In re Petition for Rulemaking to Amend N.J.A.C. 10A:71-3.11; In re Petition for Rulemaking to Amend N.J.A.C. 10A:71-3.11, N.J.A.C. 10A:71-2.2, and N.J.A.C. 10A:71-3.20,
Supreme Court Docket No. 089529

On Petition for Certification from a Final Judgment of the Superior Court of New Jersey, Appellate Division Appellate Division Docket Nos. A-0494-22, A-1180-22

Mr. Albertao:

Pursuant to Rule 2:6-2(b), kindly accept this letter brief on behalf of Amicus Curiae Center for Social Justice at Seton Hall Law School, which appeared below as amicus in the Appellate Division, in support of Petitioner the Office of the Public Defender (OPD)'s petition for certification.

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PRELIMINARY STATEMENT

Amicus Seton Hall University School of Law's Center for Social Justice (Amicus or "CSJ") joins consolidated Petitioners-Appellants, Ronald Robbins and the Office of the Public Defender, in urging this Court to grant certification in this matter of significant public importance involving the New Jersey State Parole Board ("the Board")'s unlawful across-the-board denials of psychological and medical records to people seeking parole—the very subjects of those records. Petitioners' request for rulemaking reasonably asked the Board to conform its regulations to due process. But the Appellate Division wrongly upheld the Board's unreasonable rejection of that request, committing its own unsustainable errors in the process. Specifically, the panel patently misconstrued the Board's confidentiality rules, conflated an inapposite rule of the Department of Corrections ("DOC"), and ignored clear evidence of the Board's automatic withholding of these records as a matter of course in all parole proceedings.

On that last point, the Appellate Division wrongly concluded that there was a "sparse record" on whether the Board withholds confidential psychological records in every parole case. To the contrary, the Board virtually conceded that it keeps these records from parole seekers in every case. Indeed, it argued that doing so is consistent with due process and failed to name in briefing or oral argument a single case where it provided these records to a

parole seeker in the absence of an appellate decision directing it to do so. The Board likewise failed to counter the experience of amicus, recounted to the court below, that confirmed the routine nature of the Board's parole record secrecy.

Unless this Court grants certification and corrects these errors, the Board will continue to violate due process in parole proceedings. As set forth more fully below, secret evidence in parole proceedings poses profound risks for inaccurate decision-making and gamesmanship and undermines attorneys' duty of zealous advocacy. These are weighty interests of public importance in a parole system where a person's liberty hangs in the balance and most parole seekers are unrepresented by counsel. For all these reasons, amicus respectfully urges this Court to grant certification to correct the Appellate Division's errors and to ultimately enforce the demands of due process.

STATEMENT OF INTEREST OF AMICUS CURIAE

Amicus Seton Hall University School of Law's Center for Social Justice ("CSJ") is both a state-certified legal services provider and a clinical legal education program through which students and professors advance the rights and interests of low-income clients and other disempowered members of society. The CSJ includes the Equal Justice Clinic, which advocates for people seeking parole and those challenging extreme sentences. Given the CSJ's mission, amicus has a strong interest in ensuring that the Board abides by due process

and provides people seeking parole with appropriate access to their psychological and medical records. Amicus shares its unique perspective with the Court that by disadvantaging already vulnerable, often unrepresented, people in the parole process and undermining attorneys' duties to their clients, the Board's secrecy practices transgress the values of equal justice and zealous advocacy that we seek to inculcate in our students.

STATEMENT OF THE CASE

Amicus adopts the Statement set forth in the Petition for Certification.

ARGUMENT

I. Certification is Necessary to Correct the Appellate Division's Plain Misinterpretation of the Parole Board's Confidentiality Rules, Which Violate Due Process by Sanctioning the Per Se Denial of Psychological and Medical Records to People Seeking Parole.

Certification is warranted in this matter to correct the Appellate Division's egregious misinterpretation of N.J.A.C. 10A:71-2.2, a regulation which invites and sanctions systemic violations of due process. Specifically, the regulation allows the Board to shield all psychological and other medical records from people seeking parole in violation of Thompson v. N.J. State Parole Bd., 210 N.J. Super. 107, 120-21 (App. Div. 1986). That decision held that due process requires disclosure to a parole seeker of their own psychological and other medical records unless doing so would pose a risk to institutional security or would interfere with a person's rehabilitation. Id. at 123. The panel looked past

this clear conflict between the rule and settled due process law by erroneously relying upon an inapposite DOC regulation governing the Open Public Records Act ("OPRA") that has no bearing upon parole proceedings. N.J.A.C. 10A:22-2.7(a), (d), (e). That irrelevant regulation does not mitigate the facial conflict between N.J.A.C. 10A:71-2.2 and Thompson's due process demands. Certification should therefore be granted because "the decision under review conflict[s] with [Thompson: a] decision of the same…court." R. 2:12-4.

In Thompson, the Appellate Division reasoned that a qualified due process interest in release of a person's own psychological and other medical records exists because people seeking parole have a "protected liberty interest, rooted in the language of our parole statute, in parole release[.]" Id. Parole seekers are thus entitled to "certain procedural protections, among which is a limited right to disclosure of prison records in parole proceedings." Id. at 121. Thompson recognized that parole applicants' due process interests in disclosure may only be overcome where the Board demonstrates that release of specific documents poses a risk to institutional security or would interfere with a person's rehabilitation. Id. at 123. While Thompson evaluated an earlier, now-replaced version of the regulations, see id. at 118 (quoting then operative language of N.J.A.C. 10A:71–2.1(c)), its due process analysis still governs people's access to their own parole records.

Here, the panel below correctly noted that Thomspon "unequivocally" held that "'[a] Parole Board rule or policy flatly prohibiting prisoner access to parole files would no longer be sustainable.'" Pca34-35. Nevertheless, the panel erroneously upheld the Board's arbitrary refusal to conform N.J.A.C. 10A:71-2.2 to that decision's due process mandates. It veered off course in its egregious misreading of N.J.A.C. 10A:71-2.2. Pca34-25.

The Board's regulations mandate: (1) that all "medical, psychiatric or psychological" records "shall be deemed confidential" *see* N.J.A.C. 10A:71-2.2(a)(1)[1] and (2) that material "classified as confidential" shall not be produced to parole seekers. N.J.A.C. 10A:71-2.2(c). These rules thus invite and sanction the non-disclosure of all medical, psychiatric or psychological records notwithstanding the content of the reports, the nature of the case, or whether there are any individualized risks posed by disclosure. A plain reading of the regulations' clear terms shows that the rule permits the Board to engage in the "categorical denial" of records that the panel concedes would violate Thompson.

The panel elided this profound mismatch between the Board's secrecy rule and Thompson, by relying upon an inapposite, wholly irrelevant regulation governing the Department of Corrections. See N.J.A.C. 10A:22-2.7(d). That rule

[1] N.J.A.C. 10A:71-2.2(a)(2) (same as to "alcohol, drug, or other substance abuse" records).

also designates as confidential "[a]ny information relating to medical, psychiatric or psychological history, diagnosis, treatment or evaluation." N.J.A.C. 10A:22-2.3(a)(4). But, critically, unlike the Parole Board rule, the DOC rule, which governs OPRA, allows for discretionary consideration of factors similar to those outlined in Thompson. It allows a person to "obtain a copy of his or her medical records" unless institutional concerns require otherwise. N.J.A.C. 10A:22-2.7(a), (d), (e).

The OPRA rule governing the DOC plays no role in the parole proceedings. It does not apply or override N.J.A.C. 10A:71-2.2(c), which makes "material . . . classified as confidential by the Board" subject to withholding without exception. Accordingly, the panel not only wrongly construed the Board's regulations, it failed to resolve the due process problems raised in the petition for rulemaking. The Court should grant certification to address these clear errors that undermine settled precedent and sanction ongoing due process violations.

II. The Record Was Hardly "Sparse" on Whether the Parole Board Withholds Confidential Psychological Records in Every Case: The Board Virtually Conceded This and Amicus's Experience, Presented to the Court Below, Confirms It.

The Appellate Division erroneously concluded that there was a "sparse record" on whether the Board withholds confidential psychological records in every parole case. Pca35. To the contrary, the Board virtually conceded that it keeps these records from parole seekers in every case and as a matter of course.

Pa11. And it likewise failed to counter or justify the experience of amicus, recounted to the court below, laying bare the risk of inaccurate decision-making and gamesmanship wrought by this unlawful system. Accordingly, this basis for the panel's decision is not supported by the record before the Appellate Division.

Indeed, the Board's own positions and statements in this case about its practices are far from a "sparse record." The Board did not deny withholding all psychological evaluations from every parole seeker. In fact, it took the position that that it is legally entitled to do so, claiming that it "does not believe that it violates due process by withholding mental health evaluations" from parole seekers. Pa11. That concession alone should have been a red flag for the panel since its opinion correctly recognized that a "categorical denial" of confidential information to people seeking parole "would constitute an abdication of discretion as required in Thompson." Pca34-35 (alteration in original) (quoting Thompson, 210 N.J. Super. at 122). The Board's claim "that the current form [of the regulation] remains consistent with Thompson[,]" Pa10, and that "in practice the procedures outlined in Thompson have been followed[,]" Pa12, is entirely hollow.

Although this Court in Thompson recognized that withholding records could be appropriate and comply with due process if necessary for "the safe operation of a prison[,]" the Court was clear that such circumstances would be

"exception[s]" to the due process interest in disclosure. Thompson, 210 N.J. Super. at 123. The Court cited only two categories that could warrant such exception: "[d]isclosures threatening to institutional security," and "therapeutic matters...if it would interfere with prisoner rehabilitation and relationships with therapists." Id. (emphasis added). To adopt the Board's argument that its rule and practice conform to Thompson would accept that the exceptions to the presumption of disclosure are present in every case, since the Board denies access to records as a matter of course. Exceptions cannot swallow a rule mandated by the Constitution. Thompson, 210 N.J. Super. at 122 (rejecting "flat" prohibitions on "access to parole files" as inconsistent with due process).

The Board also claimed before the Appellate Division that it releases these material documents to parole seekers only when ordered to do so by "court order." Pa11. Indeed, counsel for the Board stated at oral argument that he was not aware of "a single instance where disclosure was granted by the Board," rather than a court. Pca35. Counsel did not supplement the record after argument to point to any other discovered instance of voluntary disclosure. The Board's inability to identify a single case where it provided these records to a parole seeker in the absence of an appellate decision directing it to do so should have been another red flag confirming the Board's systematic flouting of due process.

Unfortunately, the Appellate Division sanctioned this lawlessness. It concluded that "an appeal from a denial of disclosure" is the appropriate forum to create "a record with which to scrutinize whether the Board . . . violated the inmate's due process rights." Pca36. But that reasoning cannot stand where due process is not a second-class constitutional right that may be deferred until appeal and once your liberty interest have already been thwarted. As Thompson made clear: due process governs the parole proceeding in the first instance. 210 N.J. Super. at 121 (providing for "a limited right to disclosure of prison records in parole proceedings") (emphasis added).

Deferring compliance with constitutional rights until an appellate court can review the potential violation also invites further abuses and gamesmanship by the Parole Board as demonstrated by one of amicus's parole cases. Amicus is counsel in a parole appeal to a 72-year-old man with significant health issues which is currently pending before the Appellate Division. M.B. v. N.J. State Parole Bd., A-002117-22. Before retaining our pro bono representation on appeal, our client proceeded pro se before the Board and the Board, as it always does, withheld his psychological records. When counsel challenged the denial of our client's psychological records on appeal, the Board claimed in its opposition brief that our client waived this issue by not raising the due process claim as an unrepresented party in his parole proceedings. It made this claim

even though the fact of psychological report and the Board's reliance upon it to deny our client parole was never made known to him beyond a check box form decision that said the Board had "relied upon confidential records." So much for resolving the due process violations on appeal.[2] We continue to fight this on appeal, arguing that courts only decline to consider issues not presented below when "an opportunity for such presentation is available." Nieder v. Royal Indem. Ins. Co., 62 N.J. 229, 234, (1973).

Even if the Board's own statements were not enough to make clear that the Board never releases these parole records consistent with Thompson's requirements, the Appellate Division also had access to additional information from amicus recounting our clinic's experience representing clients in parole case. We highlighted the case of our client, R.M., which illustrates the systemic

[2] Similarly, while the Board claims that it "note[s] in the incarcerated person's file the basis for the withholding of a mental health evaluation from the incarcerated person" Pa11, the Board's per se approach to withholding in every case belies the individualized analysis contemplated by Thompson. 210 N.J. Super. at 126. Indeed, recent evidence suggests that the Board commonly ignores Thompson's procedural protections. See, e.g., Spillane v. N.J. Parole Bd., 2019 WL 3194274, Docket No. A-0880-15T2 *3 (App. Div. July 16, 2019) (noting that "the Board failed to note the reasons for nondisclosure in its decision denying appellant parole" and rejecting the proffered justification); R.M., 2022 WL 16825947 at *6 (noting there was "no indication the Board undertook" the analysis required by Thompson and that it provided "no rationale for withholding [a psychological] report from R.M." where there was "nothing to suggest R.M.'s access to the [psychological] Evaluation would pose a safety or security concern").[2]

due process problems, unfairness, and risk of inaccurate decision-making invited by the Board's flouting of Thompson's requirements.

Thompson directed the Board to describe "the reason for nondisclosure" of parole records in the Board's version of the file and then identify any confidential documents that "played a substantial role in producing [an] adverse decision" against the person seeking parole. Thompson, 210 N.J. Super. at 126 (emphasis added). This formulation assumed that the Board would only withhold evidence relied upon by the Board to deny parole subject to limitations and procedural protections. It apparently never contemplated that the Board would also deny people seeking parole favorable psychological evidence that supports release but which the Board inexplicably disregarded. This is exactly what happened in R.M.'s case.

Specifically, the Board designated a psychological evaluation it secured to address his eligibility for parole as "confidential" and withheld it from our self-represented client in his parole proceedings. That report by Dr. Andrew Greenberg ("the Greenberg Evaluation") concluded that R.M.'s decades of therapy and long-term psychiatric medication made him stable, devoid of anger issues, and capable of living a law-abiding life if released. R.M., WL 16825947, at *1-2. The Appellate Division later deemed the report "a material and highly favorable psychological evaluation" noting that it concluded that R.M. had a low

risk of reoffending. Id. at *6. Shockingly, in denying parole, the Board "never discussed or cited to" the evaluation. Id. at *2. Indeed, the Board's decision asserted that it did not rely upon any "confidential materials" at all.

Once amicus took R.M.'s case on appeal, the Board required counsel to sign a Consent Protective Order ("CPO") to receive the confidential report, which we did, while preserving our objection to this secrecy restriction. In briefing, counsel pointed out the obviously arbitrary and capricious nature of the Board denying parole while purporting not to consider a material and favorable report it secured for the very purpose of assessing R.M.'s potential for successful release. The Board then changed its tune. It claimed that the Greenberg Evaluation was part of the record and thus automatically considered, see id. at *2, even though the Board did not discuss or mention it in its decision.

The Appellate Division ultimately reversed and remanded, directing the Board to "conduct a new hearing and render a new decision expressly addressing the Greenberg Evaluation[.]"R.M., WL 16825947, at *1-2. But this story shows the danger of waiting to cure due process violations on appeal and not holding the Board to its obligation to comply with the constitution in every instance. The Board endeavored to have it both ways. It sought to ignore a favorable report in its decision denying release but kept it from our client and restricted counsel from discussing it with him. The Board never mentioned or considered this

material evidence in its decision until counsel pressed the issue. Had amicus not taken on R.M.'s initially pro se appeal pro bono and signed a CPO while preserving our objection to it, R.M. and possibly the Appellate Division might have never known about the "highly favorable" psychological assessment that went to the heart of the parole release decision. R.M.'s case thus demonstrates that without strict adherence to Thompson, the Board's handling of secret evidence invites unfair and inaccurate decision-making.

The concealing of relevant evidence in this way is particularly problematic given that New Jersey law creates a presumptive right to parole and people "shall be released" unless the Board rebuts the statutory presumption by a preponderance of the evidence. N.J.S.A. 30:4-123.56. In R.M.'s case and others, blanket secrecy rules make it easier for the Board to conceal probative evidence bearing upon whether the Board meets its own rebuttal burden. Where a person seeking parole lacks counsel, such evidence could very likely go unnoticed if, as in R.M.'s case, it is never mentioned in the Board's written decision reviewed on appeal.

Norms regarding disclosure of material evidence in other civil and criminal contexts seek to avoid these harms and similar potential for gamesmanship. See, e.g., State v. Garcia, 245 N.J. 412 (2021) (holding that the erroneous withholding of relevant evidence from a jury enabled a prosecutor to

engage in "improper gamesmanship [that] had the clear capacity to unfairly tip the scales in this pitched credibility contest"); Rice v. Miller, 455 N.J. Super. 90, 105 (App. Div. 2018)(describing "obvious purpose" of disclosure requirements governing anticipated experts as promotion of "fair advocacy" and discouragement of "gamesmanship"); State v. Wyles, 462 N.J. Super. 115, 125 (App. Div. 2020) (reasoning that depriving full disclosure of material evidence in criminal case was "in direct contravention of the truth-seeking process and avoidance of gamesmanship established under the discovery rules and supporting case law"); United States Bank v. Wolosoff, 196 N.J. Super. 553, 562 (App. Div. 1984) (noting that in civil context New Jersey Courts "have emphatically discouraged gamesmanship and have liberally construed our discovery rules").

Amicus is not suggesting, of course, that disclosure of records in parole proceedings is governed by the same discovery rules applicable to other criminal or civil proceedings. Rather, the point is that the Board's compliance with the due process limitations set forth in Thompson protects and promotes values that are important to our system of justice: fairness, accurate decision-making, and avoidance of gamesmanship. See Thompson, 210 N.J. Super. at 123-24 ("[P]risoners are entitled not only to reasonable standards implementing a confidentiality exception which is no broader than its lawful purpose requires,

but also to good faith determinations, made pursuant to those standards, whether file materials are to be withheld.") (emphasis added).

These concerns are particularly salient given that most people who seek parole are not represented by counsel, both before the Board and on appeal. See Puchalski v. New Jersey State Parole Bd., 55 N.J. 113 (1969) (finding no right to counsel in parole proceedings under the 1948 Parole Act, which was subsequently replaced by the 1979 Parole Act). Ensuring standards that promote compliance with due process on the front end is thus essential to avoid the improper withholding of material information. Thompson recognized that people seeking parole are at particular disadvantage in detecting wrongful denial of parole records "in a system whose purpose is to prevent him from knowing anything about the materials which were removed from the file." Id. at 125.

R.M.'s fight for a fair parole proceeding is not over. Even after this favorable Appellate Division decision, the Board conducted a second psychological evaluation upon remand and again kept this second favorable psychological report from our client even though it was nearly identical to the first one that the Appellate Division ordered disclosed because its withholding was a due process violation. His case is currently on appeal to the Appellate Division for a second time and R.M. remains incarcerated several years and

counting after his initial defective parole proceeding. See R.M. v. N.J. State Parole Bd., A-003398-23 (pending).

In sum, R.M.'s case demonstrates that allowing the Board to automatically keep all parole records secret is inconsistent with fair and accurate decision-making. Rulemaking is necessary to bring the Board's parole secrecy practices into conformance with due process and the Appellate Division's decision to the contrary warrants this Court's certification.

III. This Case Presents an Issue of Public Importance Because the Board's Default Withholding of Often Material Evidence in Parole Proceedings Violates Due Process and Improperly Threatens Attorneys' Duty of Zealous Advocacy to their Clients.

The Board's default approach to secrecy in parole proceedings has two components: (1) it keeps all psychological reports and other medical reports secret as a matter of course, which as explained above cannot be countenanced with due process; and (2) it requires counsel to sign CPOs as a condition of receiving such evidence, which mandate that attorneys keep this information from their clients. As Thompson already recognized, permitting counsel to access records but then restricting their communications about them with their clients does not meet the requirements of due process. 210 N.J. Super. at 125. But even more so, asking attorneys to go along with this scheme undermines attorneys' ethical duties to their clients.

In flatly rejecting an approach to due process that would depend upon the parole applicant's counsel accessing such evidence but keeping it from their clients, Thompson noted the additional argument that such an approach would also "interfere with the attorney-client relationship." Id. That concern remains highly relevant 38 years later. The record is now clear that CPOs provide only limited oversight of the Board's per se approach to secrecy in parole determinations. This leaves pro se parole seekers without protection against secret evidence and undermines the attorney-client relationship by restricting attorneys' zealous representation of their clients.

This Court has long recognized that the "duty of zealous representation" is an "attorney's primary duty" LoBiondo v. Schwarz, 199 N.J. 62, 73 (2009), and that "our system of justice depends" upon it. Id. at 101; see also GEOFFREY C. HAZARD, JR. & W. WILLIAM HODES, THE LAW OF LAWYERING: A HANDBOOK ON THE MODEL RULES OF PROFESSIONAL CONDUCT (1985) (describing zealousness as "the fundamental principle of the law of lawyering"). As we teach our students in the Center for Social Justice, the duty of zealous advocacy encompasses several professional obligations, including the duty of loyalty to the client, see R.P.C. 1.7, and the duties of diligence, R.P.C. 1.2, communication, R.P.C. 1.3, and competence, R.P.C. 1.1. An attorney is hampered in their ability to fulfill each of these obligations when "counsel

cannot effectively evaluate materials purporting to report on the client without consulting the client about them." Thompson, 210 N.J. Super. at 125.

Specifically, attorneys cannot competently ensure the accuracy of information relied upon in the record and communicate with the client to investigate further. Simply because a professional prepares a report does not mean the information within it is sacrosanct or accurate. See State v. Kuntz, 55 N.J. 128, 144 (1969) (as a matter of "rudimentary fairness" defendants are entitled to review presentence reports to verify the information within them); Thompson, 210 N.J. Super at 117 ("Unless a defendant could see the report, no one with the requisite knowledge and interest would be able to point out error[.]"); Acoli v. N.J. State Parole Bd., 250 N.J. 431, 446 (2022) (noting two psychologists retained by the Board six years apart "arrived at completely different conclusions" based on "the same exact" information).

Moreover, under the Parole Act, once a person reaches their parole eligibility date, they are presumptively eligible for release. See N.J.S.A. 30:4-123.56. In re Trantino Parole Application, 89 N.J. 347, 355–56 (1982) (the Act "effectively established a presumption in favor of parole"). The Parole Act then "shifts the burden to the State to prove" by a preponderance of credible evidence that person should not be released, which is the Board's burden alone. New Jersey Parole Bd. v. Byrne, 93 N.J. 192, 205 (1983). As this Court recently

recognized, the statutory requirement to rebut the presumption of release requires "the Board [to] show that there is a substantial 'probability' that an inmate will reoffend [which] is a fairly high predictive bar that must be vaulted[.]" Acoli, 250 N.J. at 456. No competent and zealous advocate would permit a pivotal piece of evidence relied upon the Board to vault "a fairly high predictive bar" to stand without further inquiry. And no client-centered attorney, an ethic which amicus nurtures in our students, would assume they know best what to make of such evidence without communication with their client.

Indeed, the third-year law students who work with amicus are uniformly confused and outraged when they learn that, as a condition of obtaining access to record evidence, the Board asks counsel not to share material evidence with our clients. "How can we effectively represent our clients if we cannot speak to them about the evidence," they ask? Those instincts are right. The Board's secrecy practices disadvantage vulnerable, often unrepresented parole seekers and undermine attorneys' duties to their clients. This strikes at the heart of equal justice and zealous advocacy—values amicus strives to inculcate in our students.

Moreover, most people who seek parole are not represented by counsel either before the Board or on appeal. Pro bono counsel can only take on a small fraction of the cases and remedying some violations on appeal does not solve the systemic due process problem. That some small number of parole seekers with

counsel might eventually right a wrong on appeal is no answer. Only systematic change through rulemaking will cure the Board's chronic violation of due process in parole proceedings.

CONCLUSION

For all these reasons, amicus respectfully submits that the Court should grant certification to address these issues of general public importance.

Respectfully submitted,

Center for Social Justice
Seton Hall Law School

/s/Jennifer B. Condon
Jennifer B. Condon
833 McCarter Highway
Newark, NJ 07102
(973) 642-8700
Jenny-Brooke.Condon@shu.edu
NJ Attorney ID: 025912003

Amicus Curiae
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