

DURKIN & DURKIN, LLC

By: Gregory F. Kotchick (NJ State Bar No.: 027971999)

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P: (973) 244-9969 - Our File No.: 4320-73

Attorneys for Plaintiff, New Jersey Turnpike Authority

**NEW JERSEY TURNPIKE
AUTHORITY,**

Plaintiff,

v.

DEVON TYLER BARBER,

Defendant.

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

DOCKET NO.: ATL-DC-007956-25

CIVIL ACTION

NOTICE OF MOTION

TO: Devon Tyler Barber
325 E. Jimme Leeds Road, Suite 7
Galloway, NJ 08205
e-mail: tylerstead@protonmail.com

PLEASE TAKE NOTICE that on Friday, December 19, 2025, at 9:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned shall move on behalf of the Plaintiff, New Jersey Turnpike Authority (the “Plaintiff” or “NJTA”), before the Superior Court of New Jersey, Law Division – Special Civil Part, Atlantic County, for the entry of a protective order pursuant to R. 4:10-3 limiting discovery in this matter to information relevant to the claims and defenses and quashing Defendant’s outstanding discovery demands as outside the scope of permissible discovery.

PLEASE TAKE FURTHER NOTICE that the Defendant shall rely upon the attached Letter Brief and Certification of Counsel, filed simultaneously herewith in support of its motion.

PLEASE TAKE FURTHER NOTICE that pursuant to R. 1:6-2(a), a copy of a proposed Order is annexed hereto.

PLEASE TAKE FURTHER NOTICE that pursuant to R. 1:6-2(d) the undersigned waives oral argument, unless timely opposition to this Motion is served.

PLEASE TAKE FURTHER NOTICE that the relief requested may be granted unless opposition papers are timely filed and served upon counsel no later than eight (8) days before the return date of this motion, unless the Court relaxes that time.

DURKIN & DURKIN, LLC

Attorneys for the Plaintiff

By: /s/ *Gregory F. Kotchick*
Gregory F. Kotchick

Dated: November 26, 2025

CERTIFICATION OF SERVICE

I certify that the within Notice of Motion, Brief, Certification of Counsel, and proposed form of Order were this date electronically filed with the Court, and a copy of same was served as follows:

Via Regular Mail & E-Mail

Devon Tyler Barber
325 E. Jimme Leeds Road, Suite 7
Galloway, NJ 08205
e-mail: tylerstead@protonmail.com

DURKIN & DURKIN, LLC

Attorneys for the Plaintiff

By: /s/ *Gregory F. Kotchick*
Gregory F. Kotchick

Dated: November 26, 2025

DURKIN & DURKIN, LLC

By: Gregory F. Kotchick (NJ State Bar No.: 027971999)

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CIVIL ACTION

ORDER

THIS MATTER having been opened to the Court upon the application of Durkin & Durkin, LLC, attorneys for the New Jersey Turnpike Authority (the “Plaintiff” or “NJTA”), for a protective order pursuant to R. 4:10-3, and the Court having considered all papers submitted, and heard oral arguments of counsel, if any, and for good cause shown;

IT IS on this _____ day of _____ 2025,

ORDERED that the Plaintiff’s motion for a protective order pursuant to R. 4:10-3 be and is hereby granted; and it is further

ORDERED that Defendant’s outstanding discovery demands, including interrogatories, requests for production, and requests for admissions dated October 27, 2025, are hereby quashed as outside the scope of permissible discovery; and it is further

ORDERED that discovery in this matter is limited to information relevant to the claims and defenses in this action, specifically whether Defendant incurred tolls and owes the resulting administrative fees resulting therefrom; and it is further

ORDERED that a copy of this Order shall be served upon all parties within _____ ()
days of entry.

The Honorable Dean R. Marcolongo, J.S.C.

Opposed: _____

Unopposed: _____