

John Paff
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Plaintiff

JOHN PAFF,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION, CIVIL PART
Plaintiff	:	CAMDEN COUNTY
vs.	:	DOCKET NO. L-7027-06
	:	
LAWNSIDE BOROUGH COUNCIL	:	Civil Action
	:	
Defendant	:	CERTIFICATION IN SUPPORT OF
	:	MOTION

John Paff certifies as follows:

1. I am the Plaintiff in this action and am fully and personally familiar with the facts of this case.
2. A true copy of the Court's April 13, 2007 Order Granting Partial Summary Judgment is attached as Exhibits 1 through 3.
3. A true copy of Defendant's Counsel's April 27, 2007 Certification, without attachments, submitted in response to the Court's April 13, 2007 Order, is attached as Exhibits 4 through 9.
4. A true copy of my May 1, 2007 response to Counsel's April 27, 2007 Certification is attached as Exhibits 10 through 12.
5. On June 8, 2007, this Court granted my motion contesting the sufficiency of Counsel's April 27, 2007 Certification and entered an Order, attached as Exhibits 13 and 14, requiring Defendant to "file and serve another certification that complies with the Court's April 13, 2007 Order."

6. On August 8, 2007, Defendant's Counsel submitted another certification in accordance with the Court's June 8, 2007 Order. A copy of the six-page certification, without attachments, is attached as Exhibits 15 through 20.

7. On August 16, 2007, I submitted an eight-page letter a) rebutting the arguments set forth in Defendant Counsel's August 8, 2007 Certification and b) asking the Court to schedule an *in camera* hearing. A copy of my letter, without attachments, is attached as Exhibits 21 through 28.

8. In late August or early September 2007, I received a voicemail from the chambers of Hon. Francis J. Orlando, A.J.S.C. informing me that an *in camera* hearing would only be scheduled by Order of the Court.

9. The only minutes that are still redacted and that are subject to *in camera* inspection are:

- a. January 23, 2006 (Exhibits 29 – 33)
- b. February 1, 2006 (Exhibit 34)
- c. February 22, 2006 (Exhibit 35)
- d. April 5, 2006 (Exhibit 36).

10. Prior to November 9, 2007, I will also move for summary judgment on the remaining counts in the Complaint. I will ask that the return date of that motion fall on December 7, 2007, so that argument on the summary judgment motion will coincide with the *in camera* inspection.

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.

Dated: October 30, 2007

John Paff