

John Paff  
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Plaintiff

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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 FOR SUMMARY JUDGMENT

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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 First Amended Complaint, with exhibits, filed in this case is attached as Exhibits 1 through 21. (Note that the Exhibits 5 - 21 also bear a "Complaint Exhibit" number in the lower left hand corner, which corresponds to the numbers assigned to those exhibits in the First Amended Complaint.)
3. On or about August 8, 2007, after the First Amended Complaint was filed and served, Defendant released unredacted versions of its March 27, 2006 and May 31, 2006 closed session minutes and a more narrowly redacted version of its February 1, 2006 closed session minutes. Accordingly, I have replaced Exhibits 10, 15 and 18 with the updated versions of these minutes.
4. All of the factual allegations contained with the attached First Amended Complaint are true.

5. A true copy of Defendant's Answer to First Amended Complaint is attached as Exhibits 22 through 24.

6. Attached as Exhibits 25 through 29 is the Appellate Division's unpublished opinion in Nevin v. Asbury Park City Council, WL 2847974, App. Div. November 1, 2005.

7. In accordance with R.1:36-3, I can find no other relevant unpublished opinions.

8. A copy of this Court's April 13, 2007 Order is attached as Exhibits 30 through 32.

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: November 8, 2007

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John Paff