

BLANEY



DONOHUE

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January 16, 2015

VIA OVERNIGHT MAIL
Honorable Nelson C. Johnson, J.S.C.
Atlantic City Civil Courts Building
1201 Bacharach Blvd. 3rd Floor
Atlantic City, New Jersey 08401

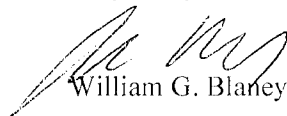
Re: Paff v. Cape May County Prosecutor's Office
Docket No: CPM-L-265-14

Dear Judge Johnson:

As per your Order, enclosed please find the requested materials pertaining to the Internal Affairs Investigation of Lt. Michael Hawthorne and Capt. David Mayer (WCPD Case IA 2013-5 a.k.a. "The Fallon Investigation") as well as what I believe to be all other documents in the possession of the Borough of Wildwood Crest and the Law Firm of Blaney & Donohue, P.A. related to the same. As requested, a Vaughn Index has been provided to guide you through the documents, audio, and video discovery contained on the enclosed USB drive (Bates Stamped 000001-001936) and 12 CDs. Also enclosed is a Certification of my Associate as to the production's completion.

In reviewing the documents, I ask that Your Honor take into account some of the information contained therein is confidential/privileged Attorney/Client material. It is only being produced because of Your Honor's Order and it is not the Borough's intention to waive its right to assert said privilege. Should you need any additional clarification or information about the attachments herein, please do not hesitate to contact me or my Associate Kyle D. Weinberg.

Very Truly Yours,



William G. Blaney

CC: ENCLOSED CERT. ONLY
James B. Arsenault, Counsel, Cape May County
Doreen Y. Corino, Solicitor, Borough of Wildwood Crest
J. David Meyer, Esquire
Joseph J. Rodgers, Esquire
Richard Gutman, Esquire

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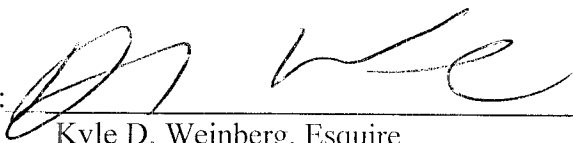
<p>JOHN PAFF, Plaintiff vs. CAPE MAY COUNTY PROSECUTOR'S OFFICE, Defendant(s).</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION CAPE MAY COUNTY Docket No.: CPM L-265-14 <i>Civil Action</i> CERTIFICATION OF KYLE D. WEINBERG, ESQUIRE</p>
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I, Kyle D. Weinberg, Esquire, hereby depose and say:

1. I am an attorney at law in the State of New Jersey and an Associate in the law firm Blaney & Donohue, P.A. Our office represents the Borough of Wildwood Crest in the above action. I have been the attorney primarily responsible for complying with the court's December 12, 2014 oral Order to produce documents in this case for in-camera review. As such, I am fully familiar with the facts and circumstances of this certification.
2. I make this certification in support of the Honorable Nelson C. Johnson's request to view in-camera all documents pertaining to Wildwood Crest Police Department's Internal Affairs Investigation 2013-5, a.k.a. "The Fallon Investigation."
3. I have used my best efforts to obtain and copy all electronic, digital, and requested documents from the following locations pertaining to the IA file 2013-5:

- a. Wildwood Crest Police Department's Internal Affairs Investigation file (IA File 2013-5)
 - b. Blaney & Donohue, P.A.'s case file
 - c. Blaney & Donohue, P.A. email system
 - d. Personnel files of the subject officer's involved in the IA investigation 2013-5
4. To the best of my knowledge and belief, and after diligent inquiry, I have fulfilled the Court's Order by providing the document, audio, and video materials requested that were in the possession of the Borough of Wildwood Crest and/or the Law Firm of Blaney & Donohue, P.A.
 5. I have also completed a Vaughn index of those documents as requested by the Court.
 6. I am unaware of any responsive documents that are being withheld. Should I subsequently discover the same, I shall immediately forward them to the court.

I, Kyle D. Weinberg, 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.

By: 

Kyle D. Weinberg, Esquire
BLANEY & DONOHUE, P.A.
Attorneys for Defendant(s)

Dated: January 16, 2015