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ROBERT L. MESSICK, ESQ.  
Attorney I.D. 203231961  
41 Grove Street  
Haddonfield, NJ 08033  
(856) 429-2236  
FAX: (856) 429-1060  
Attorney for Defendant, Borough of Bellmawr

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JOHN PAFF,  
Plaintiff,

vs.

BELLMAWR BOROUGH COUNCIL,  
Defendant.

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION- CAMDEN COUNTY

DOCKET NO. CAM-L-000804-16

Civil Action

**ANSWER**

I, Robert L. Messick, am an attorney -at-law of the State of New Jersey, and I represent the Borough of Bellmawr, a municipal corporation of the State of New Jersey, who is the Defendant in this matter. By way of response to the Plaintiff's Complaint I say as follows:

PARTIES

1. Neither admitted nor denied.
2. Admitted.

VENUE

3. Admitted.

FIRST COUNT

4. Admitted.  
5. Neither admitted nor denied. Plaintiff is left to his proofs.

WHEREFORE, Defendant, Borough of Bellmawr, demands judgment dismissing Plaintiff's Complaint.

SECOND COUNT

6. Neither admitted nor denied. Plaintiff is left to his proofs.  
7. Neither admitted nor denied. Plaintiff is left to his proofs.  
8. Neither admitted nor denied. Plaintiff is left to his proofs.

WHEREFORE, Defendant, Borough of Bellmawr, demands judgment dismissing Plaintiff's Complaint.

CERTIFICATION PURSUANT TO R.138-7(b)

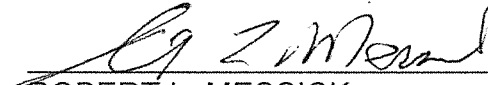
I certify that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future.

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to R.4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. In

addition, I recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

Dated: March 18, 2016

  
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ROBERT L. MESSICK  
Attorney for Defendant,  
Borough of Bellmawr

**CERTIFICATION OF MAILING**


I, FELICE BRAM, of full age, hereby certify that:

I am employed at the law office of Robert L. Messick, Esq., attorney for Defendant, Borough of Bellmawr, and on March 18, 2015 I mailed a copy of the within Answer to John Paff, Plaintiff, pro se, by:

- 1) First Class Mail with postage prepaid thereon to 2106 S. Cypress Bend Drive, Apt. 102, Pompano Beach, FL, 33069-4457; and
- 2) Email to paff@pobox.com

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: March 18, 2016

  
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FELICE BRAM