

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 P-1 through P-3.
3. A true copy of Defendant's Counsel's Certification, submitted in response to the Court's April 13, 2007 Order, is attached as Exhibits P-4 through P-12.
4. A true copy of my response to Counsel's Certification is attached as Exhibits P-13 through P-15.
5. On or about May 7, 2007, I received a telephone call from the Court informing me that if I wished to contest the sufficiency of Counsel's Certification, I needed to proceed by way of formal motion.

6. A true copy of my May 1, 2007 letter to Counsel (without attachments) asking for his consent to allow me to file and serve an amended complaint is attached as Exhibit P-16.

7. As of the date of this certification, I have not received my adversary's consent for me to amend my complaint.

8. I first saw the redacted notes of the Defendant's 2006 nonpublic (executive or closed) meetings on Wednesday, March 21, 2007, which is the day that I was served with the Certification of Jessie Harris and Defendant's other paperwork in opposition to my summary judgment motion.

9. Attached as Exhibits P-17 through P-20 are the minutes from the nonpublic and public meetings held by Defendant on March 27, 2006. The nonpublic meeting minutes are redacted. Both were provided to me as exhibits to the Certification of Jessie Harris.

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: May 10, 2007

John Paff