



*State of New Jersey*

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MICHAEL T.G. LONG  
*Director*

March 16, 2023

**By Overnight Mail**

Honorable Michael J. Blee, A.J.S.C.  
Chancery Division  
Cape May County Superior Court  
9 North Main Street,  
Cape May, New Jersey 08210

Re: Department of Environmental Protection v. City of North  
Wildwood; "XYZ Corporations" 1-10; and "John and/or Jane  
Does" 1-10

DEP's Motion to Dismiss City of North Wildwood's  
Counterclaims

Dear Judge Blee:

On March 15, 2023, Plaintiff, New Jersey Department of Environmental Protection ("DEP") filed a Motion to Dismiss the City of North Wildwood's Counterclaims. In support of that Motion, DEP filed a certification from Peter Ramos. Today, DEP received a corrected copy of that certification from Peter Ramos. A copy of the corrected certification has been sent to the City of North Wildwood's counsel. The corrected certification is also included in the attached courtesy copies.



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March 16, 2023

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Thank you for the Court's attention to this matter.

Sincerely yours,  
MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Dianna E. Shinn  
Dianna E. Shinn  
Deputy Attorney General

Encls.

cc: Anthony S. Bocchi, Esq. (by e-mail)

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
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Attorney for Plaintiff State of New Jersey  
Department of Environmental Protection

By: Dianna E. Shinn (242372017)  
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NEW JERSEY DEPARTMENT OF,  
ENVIRONMENTAL PROTECTION,

Plaintiff,

v.

CITY OF NORTH WILDWOOD, "XYZ  
CONTRACTORS" 1-10, "JOHN  
AND/OR JANE DOES" 1-10

Defendants,

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SUPERIOR COURT OF NEW JERSEY  
CAPE MAY COUNTY - CHANCERY  
DIVISION

DOCKET NO. CPM-C-55-22

Civil Action

**CERTIFICATION OF PETER RAMOS**

PETER RAMOS, of full age, certifies and says:

1. I am employed as the Deputy Director, Division of Risk Management at the State of New Jersey Department of the Treasury.

2. By virtue of my position, I am familiar with and have access to the State of New Jersey's records regarding all notices of tort claim received thereby.

3. A search of our system database and files reveals that the State of New Jersey did not receive a notice of tort claim with regard to any of the allegations from Defendant City of North

Wildwood or anyone on their behalf in accordance with the New Jersey Contractual Liability Act, N.J.S.A. 59:13-5 et seq.

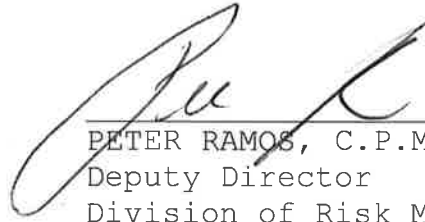
4. Pursuant to N.J.S.A. 59:13-5 et seq., public entities, such as the State of New Jersey, may by rule or regulation adopt forms specifying information to be contained in claims filed against it or its employee(s). Pursuant to this statute, the State of New Jersey is entitled to a particular Notice of Claims form, which provides specific details that enable it to initiate a satisfactory investigation of the alleged claims.

5. I am aware that the Defendant, in the above-captioned matter, claims damages in the amount of \$15 million as a result of certain allegations in its counterclaim filed February 17, 2023.

6. At the present time, State of New Jersey still has not received the Notice of Claim form in accordance with N.J.S.A. 59:13-5 et seq., from Defendant.

7. The Defendant's failure to serve a proper and complete notice of claim has made it difficult for the State of New Jersey to determine the extent of liability to which it is exposed as a result of Defendant's counterclaims.

I certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



---

PETER RAMOS, C.P.M.

Deputy Director

Division of Risk Management

NJ Department of the Treasury

Dated: March 16, 2023