

August 24, 2017

Via Email

Official Custodian of Records
Borough of Paulsboro
1211 Delaware Street
Paulsboro, New Jersey 08066
Email: xxxxxxxx@xxxxxxxxxxx.xxx

Re: Open Public Records Act

Dear Official Custodian of Records:

Pursuant to the New Jersey Open Public Records Act, N.J.S.A 47:1A-1 *et seq.*, we respectfully request copies of the following:

1. Documents¹ that regard, relate to, reference, or concern the car crash that occurred on Interstate 295 South near mile marker 17.7 at approximately 8:22 a.m. on April 26, 2015 in East Greenwich Township, Gloucester County, New Jersey. The Paulsboro Police Department responded to the crash.
2. Photographs that regard, relate to, reference, or concern the above-referenced crash.
3. Reports that regard, relate to, reference, or concern the above-referenced crash.
4. Documents that regard, relate to, reference, or concern the individuals involved in the above-referenced crash, including:
 - a. Victor M. Gonzalez, the owner of the 2007 Acura TL;
 - b. Jasmine M. Gonzalez, the driver of the 2007 Acura TL;
 - c. Nkemjika E. Anyim, a passenger in the 2007 Acura TL; and
 - d. Hector A. Ortiz, the driver of the 1999 Lexus 300.
5. Documents that regard, relate to, reference, or concern the highway products located at the scene of the above-referenced crash on Interstate 295 South near mile marker 17.7, including all median guardrail installations, guardrail panels, guardrail posts and blockouts, and component parts. This includes, but is not limited to, all records relating to the pre- and post-crash manufacture, distribution, sale, purchase, installation,

¹ "Documents" means and includes all reports, records, documents, and communications, and all written, printed, recorded, or graphic matter. It includes writings of every kind and description, and all electronic forms of communication, including email.

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inspection, maintenance, and repair of these median guardrails along Interstate 295 South near mile marker 17.7.

6. All other Open Public Records Act requests to Borough of Paulsboro and your response to such requests (including but not limited to cover letters and responsive documents) that regard, relate to, reference, or concern the above-referenced car crash, individuals, or highway products.

If possible, please provide the requested information in electronic format and via e-mail. We will pay the fees for this request. If, however, you estimate that the fees will exceed \$100.00, please contact me first and obtain our written approval before any charges are incurred.

If my request appears extensive or fails to reasonably describe the records, please email me at benjamin.goodman@xxxxxxxxxxx.xxx.

OPRA requires a response time of seven business days. If access to the records I am requesting will take longer than this, please contact me with information about when I might expect copies of the requested records.

If any portion of this request is denied in whole or in part, or any responsive documents are withheld, please provide: (1) a detailed justification for such in writing, including a citation to each specific exemption you feel justifies the refusal to release the information; (2) the name, address, telephone number, and email address of the person or body to whom an appeal should be directed; and (3) a written description of each document withheld and a reason for withholding it. We also request that you disclose any severable portions of records that are not exempt.

Please do not hesitate to contact me with any questions. Thank you for your prompt attention to this request.

Sincerely,



Benjamin Goodman
Phone: 214.651.5440
Fax: 214.200.0531
benjamin.goodman@haynesboone.com