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July 28, 2026

VIA EMAIL

Tony Michael opra+request-92776-e857fe53@requests.opramachine.com

**Re: OPRA Request
Princeton Housing Authority**

Dear Tony Michael:

On behalf of the Princeton Housing Authority, please accept the following response to your OPRA request for:

Your Request: Copies of ALL invoices for all fire extinguisher, kitchen fire suppression and fire alarm services from 2020 to present.

Response: Objection. This request is impermissibly overly broad as it pertains to: any and all written communications, internal memorandums, emails, text messages, correspondence, reports, and completed forms. While an exact definition of an impermissibly overly broad request is abstract, courts have found requests that require a custodian to exercise his discretion, survey employees, or undertake research to determine whether a record is responsive are overly broad and not encompassed by OPRA. See Doe v. Rutgers, State Univ. of N.J., 466 N.J. Super. 14, 27-28 (App. Div. 2021). This request requires the custodian to exercise discretion to determine whether to comply rather than specifically identifying documents. An OPRA applicant must identify with reasonable clarity those documents that are desired, and a party cannot satisfy this requirement by simply requesting all of an agency's documents. OPRA does not authorize unbridled searches of an agency's property. Renna v. Cnty. of Union, 407 N.J. Super. 230, 245, 970 A.2d 414 (App. Div. 2009) ("The custodian must have before it sufficient information to make the threshold determination as to the nature of the request and whether it falls within the scope of OPRA.").

Further, the request is also overburdensome in scope and time.

Tony Michael
Re: OPRA Request
July 28, 2026

Without waiving said objections, and with the right to supplement this response, your attention is directed to the accompanying documents stamped: **PHA 000001 to PHA 000011.**

Very truly yours,

**LENOX, SOCEY, FORMIDONI, GIORDANO,
LANG, CARRIGG & CASEY**

/s/ Robert F. Casey
Robert F. Casey

Enc.
c: Client (*via email*)