

REVISED

PORZIO, BROMBERG & NEWMAN, P.C.

100 Southgate Parkway

Morristown, NJ 07962-1997

(973) 538-4006

Vito A. Gagliardi, Jr., Esq. (024821989)

David L. Disler, Esq. (068112013)

Thomas J. Reilly, Esq. (245552017)

Attorneys for Amicus Curiae New Jersey State Association of Chiefs of Police

FILED

JUN 25 2024

Heather J. Baker
CLERK

CHARLES KRATOVIL,

Plaintiff-Petitioner,

v.

CITY OF NEW BRUNSWICK, and
ANTHONY A. CAPUTO, in his
capacity as Director of Police,

Defendants-Respondents.

SUPREME COURT OF NEW JERSEY
DOCKET NO: 089427

On Petition for Certification from a Final
Order of the Superior Court Appellate
Division

Docket No.: A-000216-23T1

Sat Below:

Hon. Robert J. Gilson, P.J.A.D.

Hon. Patrick DeAlmeida, J.A.D. and

Hon. Avis Bishop-Thompson, J.A.D.

CIVIL ACTION

**AMICUS CURIAE NEW JERSEY STATE ASSOCIATION OF CHIEFS
OF POLICE'S BRIEF IN OPPOSITION TO PLAINTIFF'S PETITION
FOR CERTIFICATION**

Of Counsel:

Vito A. Gagliardi, Jr., Esq. (024821989) vagagliardi@pbnlaw.com

On the Brief:

David L. Disler, Esq. (068112013) dldisler@pbnlaw.com

Thomas J. Reilly, Esq. (245552017) tjreilly@pbnlaw.com

RECEIVED

JUN 25 2024

SUPREME COURT
OF NEW JERSEY



Matthew T. Kelly
Deputy Clerk, Chief Counsel

Heather Joy Baker
Clerk of Court

Christine A. Muller
Deputy Clerk, Chief Administrator

Richard J. Hughes Justice Complex • P.O. Box 970 • Trenton, NJ 08625-0970

njcourts.gov • Tel: 609-815-2955

June 6, 2024

DEFICIENCY NOTICE

Vito A. Gagliardi, Jr., Esq.
Porzio, Bromberg & Newman, PC
100 Southgate Parkway
PO Box 1997
Morristown, NJ 07962-1997

Re: Charles Kratovil v. City of New Brunswick and Anthony Caputo
Supreme Court Docket Number **089427**

Dear Counsel:

On June 5, 2024, this office received the brief of the New Jersey State Association of Chiefs of Police in opposition to the petition for certification in the above matter. Please be advised that, according to the Appellate Division's opinion, the New Jersey State Association of Chiefs of Police participated as an amicus curiae in this matter. Therefore, the submission will be treated as an amicus curiae brief. Please be further advised that the following deficiencies were noted:

- **An amended brief cover is required.** Please submit three (3) amended covers to be affixed to your amicus curiae brief. The brief must be titled "Amicus curiae brief," and the New Jersey Association of Chiefs of Police must be designated as an amicus curiae on the cover.
- **Insufficient copies were provided.** It appears that you submitted an original and three (3) copies of the brief, and requested that one (1) copy be returned to your office. As a result of one (1) copy being returned to you, this office retained three (3) copies of your brief. Please submit one (1) additional copy of your brief, including a revised cover, as



requested in point one (1) above. If you wish to receive a copy stamped “received” in the future, you must submit an additional copy of any papers you wish to be returned.

Failure to correct the noted deficiencies may affect the submission of this matter to the Court for its consideration.

Sincerely,

Yuri P. Albertao
Court Services Officer
(609) 815-2955

c: Alexander Shalom, Esq.
Susan K. O’Connor, Esq.
Joseph B. Paravecchia, First Asst. Prosecutor
Randolph E. Mershon, III, Asst. Prosecutor
David L. Disler, Esq.
Matthew D. Areman, Esq.
Sheila Murugan, Esq.
Frank L. Corrado, Esq.
Robert R. Cannan, Esq.

