

NATHAN VAN EMBDEN  
 Attorney at Law  
 NJ ATTY ID #025191983  
 21 E. Main St., P.O. Box 428  
 Millville, NJ 08332  
 Tel: (856) 327-4220; Fax: (856) 327-2845  
 Attorney for Plaintiff, Township of Downe

|                     |   |                              |
|---------------------|---|------------------------------|
| TOWNSHIP OF DOWNE,  | : | SUPERIOR COURT OF NEW JERSEY |
|                     | : | LAW DIVISION, CIVIL PART     |
|                     | : | COUNTY OF CUMBERLAND         |
| Plaintiff           | : |                              |
| vs.                 | : | Docket No: CUM-L-            |
|                     | : | CIVIL ACTION                 |
|                     | : |                              |
| CUMBERLAND COUNTY   | : | <b>ORDER TO SHOW CAUSE</b>   |
| BOARD OF ELECTIONS, | : |                              |
|                     | : |                              |
| Defendant           | : |                              |
|                     | : |                              |

**THIS MATTER** being opened to the Court by Nathan Van Embden, Esquire, Attorney for Plaintiff, Township of Downe, seeking relief by way summary action pursuant to R. 4:67-1(a), based upon the facts set forth in the verified complaint filed herewith; and the court having determined that this matter may be commenced by order to show cause as a summary proceeding pursuant to and for good cause shown.

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2025, **ORDERED** that the Defendants appear and show cause on the \_\_\_\_\_ day of \_\_\_\_\_, 2025 before the Superior Court at the Cumberland County Court House, 60 W. Broad Street, Bridgeton, New Jersey at \_\_\_\_\_ o'clock in the forenoon, or as soon thereafter as counsel can be heard, on why judgment should not be entered for:

- A. Requiring a recount of the vote on the referendum for approval of a single liquor license in the Township of Downe.
- B. Vacating the certification of results issued by the Cumberland County Clerk's office on the referendum for approval of a single liquor license in the Township of Downe.

- C. Authorizing Downed Township to hold a special election for the liquor license question.
- D. Allocating the cost to conduct the special election between the Township of Downe and Cumberland County Board of Elections based upon the court's determination of responsibility through the conduct of election process.
- E. Granting such other relief as the court deems equitable and just.

***FURTHER ORDERED and ADJUDGED*** that:

1. A copy of this Order to Show Cause, Verified Complaint and all supporting affidavits or certifications submitted in support of this application be served upon the Defendant by Plaintiff's counsel by certified and regular mail within three (3) days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

2. The Plaintiff must file with the Court his proof of service of the pleadings on the Defendant not later than three (3) days before the return date.

3. Defendant shall file and serve a written answer (an answering affidavit or a motion returnable on the return date) to this order to show cause and the relief requested in the verified complaint and proof of service of the same by \_\_\_\_\_, 2025. The answer (answering affidavit or a Motion), as the case may be, must be filed with the Clerk of the Superior Court in the County listed above and a copy of the papers must be sent directly to the Chambers of Judge \_\_\_\_\_.

4. The Plaintiff must file and serve any written reply to the Defendant's Order to Show Cause Opposition by \_\_\_\_\_, 2025. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directed to the Chamber of Judge \_\_\_\_\_.

5. If the Defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default,

provided that the Plaintiff file proof of service and a proposed form of order at least three (3) days prior to the return date.

6. If the Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

7. Defendant takes notice that the Plaintiff have filed a lawsuit against you in the Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of the lawsuit. If you dispute this complaint, you or your attorney must file a written answer (an answering affidavit or motion returnable on the return date to the order to show cause) and proof of service before the return date of the order to show case.

These documents must be filed with the Clerk of the Superior Court in the County listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at:

[http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf). Include a \$300.00 filing fee made payable to the "Treasurer, State of New Jersey". You must also send a copy of your answer (answering affidavit or motion) to the Plaintiffs' attorney whose name and address appear above, or to the Plaintiffs, if no attorney is named above. A telephone call will not protect your rights; you must file and service your answer (answering affidavit or motion)(with the fee) or judgment may be entered against you by default.

8. If you cannot afford an attorney, you may call the Legal Services Office in the County in which you live or the Legal Services of New Jersey Statewide Hotline at: 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and you are not eligible for free legal assistance, you may obtain a referral to an attorney by calling Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at: [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

9. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than three (3) days before the return date.

---

J.S.C.

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| TOWNSHIP OF DOWNE,  | : | SUPERIOR COURT OF NEW JERSEY |
|                     | : | LAW DIVISION, CIVIL PART     |
|                     | : | COUNTY OF CUMBERLAND         |
| Plaintiff           | : |                              |
| vs.                 | : | Docket No: CUM-L-            |
|                     | : | CIVIL ACTION                 |
|                     | : |                              |
| CUMBERLAND COUNTY   | : | <b>ORDER</b>                 |
| BOARD OF ELECTIONS, | : |                              |
| Defendant           | : |                              |
|                     | : |                              |

**THIS MATTER** having been brought before the Court by way of Order to Show Cause brought by Nathan Van Embden, Esq., attorney for the Plaintiff; and all parties in interest having received notice by certified and regular mail; and the Court having read the pleadings and considered the arguments of counsel and for good cause shown:

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2025;

**ORDERED AND ADJUDGED** as follows:

1. The certified results of the Downe Township liquor license referendum dated November 4, 2025 are vacated.
2. The Township of Downe is authorized to conduct a special election to determine the outcome of the liquor license referendum.
3. The Cumberland County Board of Elections shall contribute to the cost of such special election in the amount of \$\_\_\_\_\_.

\_\_\_\_\_  
 J.S.C.



New Jersey Judiciary  
Civil Practice Division

## Civil Case Information Statement (CIS)

Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed, or attorney's signature is not affixed.

### For Use by Clerk's Office Only

|                                                                                                                   |                                                                       |                                                                                    |                   |              |
|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------|--------------|
| Payment type <input type="checkbox"/> check<br><input type="checkbox"/> charge<br><input type="checkbox"/> cash   | Charge/Check Number                                                   | Amount<br>\$                                                                       | Overpayment<br>\$ | Batch Number |
| Attorney/Pro Se Name<br>Nathan Van Embden, Esquire                                                                | Telephone Number<br>(856) 327-4220 ext.                               | County of Venue<br>Cumberland <input type="button" value="v"/>                     |                   |              |
| Firm Name (if applicable)<br>Law Office of Nathan Van Embden                                                      |                                                                       | Docket Number (when available)                                                     |                   |              |
| Office Address - Street<br>21 E. Main St., PO Box 428                                                             | City<br>Millville                                                     | State<br>NJ                                                                        | Zip<br>08332      |              |
| Document Type<br>Order to Show Cause and Verified Complaint                                                       |                                                                       | Jury Demand<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |                   |              |
| Name of Party (e.g., John Doe, Plaintiff)<br>Township of Downe                                                    | Caption<br>Township of Downe vs. Cumberland County Board of Elections |                                                                                    |                   |              |
| Case Type Number (See page 3 for listing) <u>804</u>                                                              |                                                                       |                                                                                    |                   |              |
| Are sexual abuse claims alleged?                                                                                  |                                                                       | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                |                   |              |
| Does this case involve claims related to COVID-19?                                                                |                                                                       | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                |                   |              |
| Is this a professional malpractice case?                                                                          |                                                                       | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                |                   |              |
| If "Yes," see N.J.S.A. 2A:53A-27 and applicable case law regarding your obligation to file an affidavit of merit. |                                                                       |                                                                                    |                   |              |
| Related Cases Pending?                                                                                            |                                                                       | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                |                   |              |
| If "Yes," list docket numbers                                                                                     |                                                                       |                                                                                    |                   |              |
| Do you anticipate adding any parties (arising out of same transaction or occurrence)?                             |                                                                       | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                |                   |              |
| Name of defendant's primary insurance company (if known)                                                          |                                                                       | <input type="checkbox"/> None <input checked="" type="checkbox"/> Unknown          |                   |              |

**The Information Provided on This Form Cannot be Introduced into Evidence.****Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation**

Do parties have a current, past or recurrent relationship?

☒ Yes☐ No

If "Yes," is that relationship:

☐ Employer/Employee☐ Friend/Neighbor☐ Familial☒ Business☐ Other (explain) \_\_\_\_\_

Does the statute governing this case provide for payment of fees by the losing party?

☐ Yes☒ No

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition.



Do you or your client need any disability accommodations?

☐ Yes☒ No

If yes, please identify the requested accommodation:

Will an interpreter be needed?

☐ Yes☒ No

If yes, for what language?

**I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).**

Attorney/Self-Represented Litigant Signature: \_\_\_\_\_

# Civil Case Information Statement (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

## CASE TYPES

(Choose one and enter number of case type in appropriate space on page 1.)

### Track I - 150 days discovery

- 151 Name Change
- 175 Forfeiture
- 302 Tenancy
- 399 Real Property (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 Book Account (debt collection matters only)
- 505 Other Insurance Claim (including declaratory judgment actions)
- 506 PIP Coverage
- 510 UM or UIM Claim (coverage issues only)
- 511 Action on Negotiable Instrument
- 512 Lemon Law
- 801 Summary Action
- 802 Open Public Records Act (summary action)
- 804 Election Law
- 805 Civil Commitment Expungement
- 999 Other (briefly describe nature of action)

### Track II - 300 days discovery

- 305 Construction
- 509 Employment (other than Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (LAD))
- 599 Contract/Commercial Transaction
- 603N Auto Negligence – Personal Injury (non-verbal threshold)
- 603Y Auto Negligence – Personal Injury (verbal threshold)
- 605 Personal Injury
- 610 Auto Negligence – Property Damage
- 621 UM or UIM Claim (includes bodily injury)
- 699 Tort – Other

### Track III - 450 days discovery

- 005 Civil Rights
- 301 Condemnation
- 602 Assault and Battery
- 604 Medical Malpractice
- 606 Product Liability
- 607 Professional Malpractice
- 608 Toxic Tort
- 609 Defamation
- 616 Whistleblower / Conscientious Employee Protection Act (CEPA) Cases
- 617 Inverse Condemnation
- 618 Law Against Discrimination (LAD) Cases



**Track IV - Active Case Management by Individual Judge / 450 days discovery**

- 156 Environmental/Environmental Coverage Litigation
- 303 Mt. Laurel
- 508 Complex Commercial
- 513 Complex Construction
- 514 Insurance Fraud
- 620 False Claims Act
- 701 Actions in Lieu of Prerogative Writs
- 816 Affordable Housing

**Multicounty Litigation (Track IV)**

- 282 Fosamax
- 291 Pelvic Mesh/Gynecare
- 292 Pelvic Mesh/Bard
- 293 DePuy ASR Hip Implant Litigation
- 296 Stryker Rejuvenate/ABG II Modular Hip Stem Components
- 300 Talc-Based Body Powders
- 601 Asbestos
- 624 Stryker LFIT CoCr V40 Femoral Heads
- 626 Abilify
- 627 Physiomesh Flexible Composite Mesh
- 628 Taxotere/Docetaxel
- 629 Zostavax
- 630 Proceed Mesh/Patch
- 631 Proton-Pump Inhibitors
- 633 Prolene Hernia System Mesh
- 634 Allergan Biocell Textured Breast Implants
- 635 Tassigna
- 636 Strattice Hernia Mesh
- 637 Singulair
- 638 Elmiron
- 639 Pinnacle Metal-on-Metal (MoM) Hip Implants
- 640 Bard Implanted Port Catheter Products

If you believe this case requires a track other than that provided above, please indicate the reason on page 1, in the space under "Case Characteristics".

**Please check off each applicable category**

- ☐ Putative Class Action
 ☐ Title 59
 ☐ Consumer Fraud
- ☐ Medical Debt Claim

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| TOWNSHIP OF DOWNE,  | : | SUPERIOR COURT OF NEW JERSEY |
|                     | : | LAW DIVISION, CIVIL PART     |
|                     | : | COUNTY OF CUMBERLAND         |
| Plaintiff           | : |                              |
| vs.                 | : | Docket No: CUM-L-            |
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|                     | : |                              |
| CUMBERLAND COUNTY   | : | <b>ORDER TO SHOW CAUSE</b>   |
| BOARD OF ELECTIONS, | : |                              |
|                     | : |                              |
| Defendant           | : |                              |

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- A. Requiring a recount of the vote on the referendum for approval of a single liquor license in the Township of Downe.
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2. The Plaintiff must file with the Court his proof of service of the pleadings on the Defendant not later than three (3) days before the return date.

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provided that the Plaintiff file proof of service and a proposed form of order at least three (3) days prior to the return date.

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9. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than three (3) days before the return date.

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| TOWNSHIP OF DOWNE,  | : | SUPERIOR COURT OF NEW JERSEY    |
|                     | : | LAW DIVISION, CIVIL PART        |
|                     | : | COUNTY OF CUMBERLAND            |
| Plaintiff           | : |                                 |
| vs.                 | : | Docket No: CUM-L-               |
|                     | : | CIVIL ACTION                    |
|                     | : |                                 |
| CUMBERLAND COUNTY   | : | <b>CERTIFICATION IN SUPPORT</b> |
| BOARD OF ELECTIONS, | : | <b>OF ORDER TO SHOW CAUSE</b>   |
| Defendant           | : |                                 |
|                     | : |                                 |

I, Michael Rothman, residing in the Township of Downe, County of Cumberland and State of New Jersey, make this Certification in Support of Plaintiff's application for relief:

1. I am the Mayor of Downe Township.
2. During the last voting cycle held on November 4, 2025 a ballot question was posed asking the residents of Downe Township whether they supported the issuance of a single liquor license in the township which has none.
3. I am aware of several residents who had difficulty registering their votes on the ballot question due to malfunctioning voting machines and due to the absence of emergency ballots and conditional ballots or due to failure of such ballots being offered in lieu of working machines.
4. These residents were sent home without the opportunity to vote and their votes were not counted.

5. The referendum results were close enough that this voting problem could affect the outcome. The certified results were 277 against and 255 for the question. ( Exhibit A)

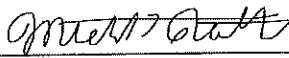
6. I believe the results of the referendum will have a significant impact on Township business and opportunity for economic advancement and failure to count every vote may skew the results away from voter intent.

7. There is period of repose where the same ballot question cannot be considered following a denial of the ballot question. Accordingly, the failure to count all votes may have the result of denying an opportunity to resolve the problem unless the initial tally is vacated in favor of an opportunity for a special election.

8. In view of the above, I respectfully request that the Court grant Plaintiff immediate relief.

9. 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: 11/24/2025

  
Michael Rothman, Mayor of Township of Downe

# EXHIBIT A



| 1 DOWNE TOWNSHIP QUESTION |              |                      |             |             |     |     |             |
|---------------------------|--------------|----------------------|-------------|-------------|-----|-----|-------------|
|                           |              |                      |             |             | 1   | 1   | 1           |
|                           |              | Registered<br>Voters | Voters Cast | Turnout (%) | YES | NO  | Total Votes |
| Downe 1                   | Early Voting | 692                  | 29          | 4.19%       | 10  | 15  | 25          |
| Downe 1                   | Election Day | 692                  | 230         | 33.24%      | 115 | 107 | 222         |
| Downe 1                   | Mail-In      | 692                  | 66          | 9.54%       | 29  | 35  | 64          |
| Downe 1                   | Provisional  | 692                  | 0           | 0.00%       |     |     |             |
| Downe 1                   | Emergency    | 692                  | 44          | 6.36%       | 16  | 24  | 40          |
| Downe 1                   | Total        | 692                  | 369         | 53.32%      | 170 | 181 | 351         |
| Downe 2                   | Early Voting | 387                  | 12          | 3.10%       | *** | *** | ***         |
| Downe 2                   | Election Day | 387                  | 165         | 42.64%      | 71  | 75  | 146         |
| Downe 2                   | Mail-In      | 387                  | 21          | 5.43%       | 7   | 12  | 19          |
| Downe 2                   | Provisional  | 387                  | 0           | 0.00%       |     |     |             |
| Downe 2                   | Emergency    | 387                  | 0           | 0.00%       |     |     |             |
| Downe 2                   | Total        | 387                  | 198         | 51.16%      | 82  | 94  | 176         |
| Downe Prov                | Early Voting | 0                    | 0           |             |     |     |             |
| Downe Prov                | Election Day | 0                    | 0           |             |     |     |             |
| Downe Prov                | Mail-In      | 0                    | 0           |             |     |     |             |
| Downe Prov                | Provisional  | 0                    | 7           |             | *** | *** | ***         |
| Downe Prov                | Emergency    | 0                    | 0           |             |     |     |             |
| Downe Prov                | Total        | 0                    | 7           |             | *** | *** | ***         |
| Downe Township            | Early Voting | 1079                 | 41          | 3.80%       | 14  | 22  | 36          |
| Downe Township            | Election Day | 1079                 | 395         | 36.61%      | 186 | 182 | 368         |
| Downe Township            | Mail-In      | 1079                 | 87          | 8.06%       | 36  | 47  | 83          |
| Downe Township            | Provisional  | 1079                 | 7           | 0.65%       | *** | *** | ***         |
| Downe Township            | Emergency    | 1079                 | 44          | 4.08%       | 16  | 24  | 40          |
| Downe Township            | Total        | 1079                 | 574         | 53.20%      | 255 | 277 | 532         |
| Total - Early Voting      |              | 1079                 | 41          | 3.80%       | 14  | 22  | 36          |
| Total - Election Day      |              | 1079                 | 395         | 36.61%      | 186 | 182 | 368         |
| Total - Mail-In           |              | 1079                 | 87          | 8.06%       | 36  | 47  | 83          |
| Total - Provisional       |              | 1079                 | 7           | 0.65%       | *** | *** | ***         |
| Total - Emergency         |              | 1079                 | 44          | 4.08%       | 16  | 24  | 40          |
| Contest Total             |              | 1079                 | 574         | 53.20%      | 255 | 277 | 532         |

\*\*\* Indicates vote data was suppressed due to voter privacy settings.

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|                     |   | : COUNTY OF CUMBERLAND         |
| Plaintiff           | : |                                |
| vs.                 | : | : Docket No: CUM-L-            |
|                     | : | : CIVIL ACTION                 |
|                     | : |                                |
| CUMBERLAND COUNTY   | : | <b>VERIFIED COMPLAINT</b>      |
| BOARD OF ELECTIONS, | : |                                |
| Defendant           | : |                                |
|                     | : |                                |

Township of Downe, having offices at 288 Main Street in the City of Newport, County of Cumberland and State of New Jersey, by way of Verified Complaint against the Defendants, does hereby say:

**FIRST COUNT**

1. Downe Township, Cumberland County participated in the November 4, 2025 Election cycle and posed a ballot question considering the authorization of a single liquor sales license in the Township.
2. There were reports of voting machines failing and the election staff failing to offer emergency or provisional ballots to those who were affected by the machine failures. It appears many voters were turned away because of the poll workers' unfamiliarity with the process of issuing emergency or provisional ballots.
3. A list of persons who are identified as having been unable to cast their ballots on the liquor license referendum include:

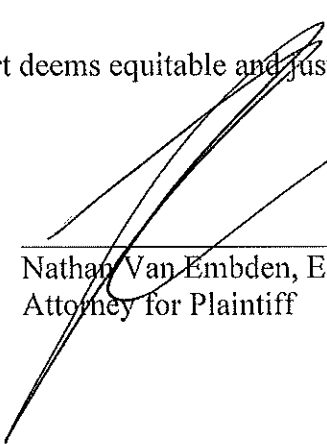
- a. Jesse Hoffner
  - b. Toby Postalwaite
  - c.
4. The Clerk of Cumberland County Certified the vote results on Thursday, November 20, 2025.
5. The results reported were 255 votes for the liquor license and 277 votes against the liquor license.
6. The impact of a denial of this ballot question includes a waiting period of 5 years before a similar question can be posed.
7. Voting discrepancies of the sort experienced in Downe Township may have impacted the results of the referendum and failed to represent the intent of the voting populace.
8. Pursuant to NJSA 19:28-1 the Township may request a recount following voting certification.
9. It is respectfully asserted that failure to promptly repair the voting machines or provide emergency ballots constitutes "malconduct" under NJSA 19:29-1(a) requiring the setting aside of the election results.
10. Additional relief contemplated by the statute allows for the holding of a special election to determine the outcome of the public proposition regarding the liquor license.

11. Downe Twp requests relief setting aside the certified results of the liquor license referendum and allowing the Township to conduct a special election to determine the outcome of the liquor license referendum.

**WHEREFORE**, Plaintiff, Township of Downe, demands Judgment against the Defendants as follows:

- (1) Vacating the Cumberland County Clerk's Certified Results of the Downe Township Liquor License Question considered on November 4, 2025 ballot.
- (2) Permitting the holding of a special election to determine the outcome of the public proposition regarding issuance of a liquor license in Downe Township.
- (3) Allocating the cost of such special election based upon the court's determination of responsibility for the failure of election officials to offer emergency ballots and/or provisional ballots; and
- (4) For such other relief as the Court deems equitable and just.

Dated: 11/24/2025



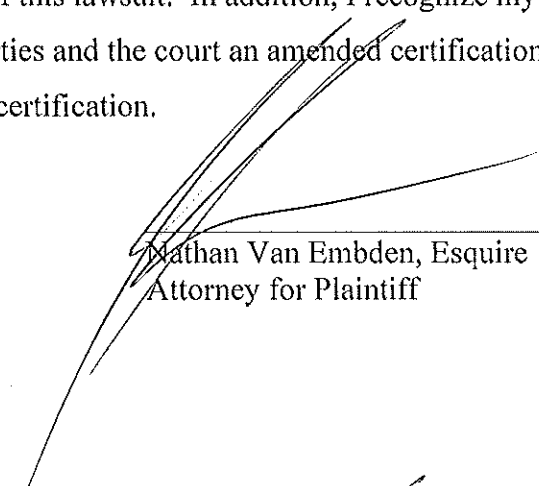
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Nathan Van Embden, Esquire  
Attorney for Plaintiff

**CERTIFICATION OF NO OTHER ACTIONS**

I certify that the dispute about which I am suing is not the subject of any other pending action in any court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration is contemplated. Further, other than the parties set forth in this complaint I know of no other parties that should be made part of this lawsuit. In addition, I recognize my continuing obligation to file and serve all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 11/24/2025

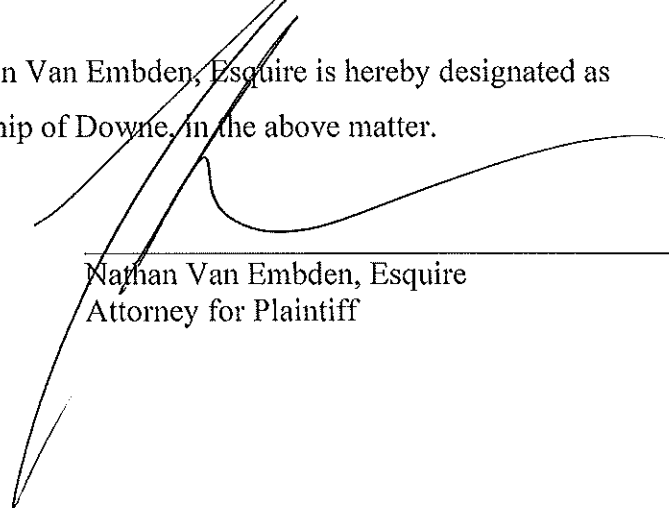


\_\_\_\_\_  
Nathan Van Embden, Esquire  
Attorney for Plaintiff

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, Nathan Van Embden, Esquire is hereby designated as Trial Counsel for the Plaintiff, Township of Downe, in the above matter.

Dated: 11/24/2025

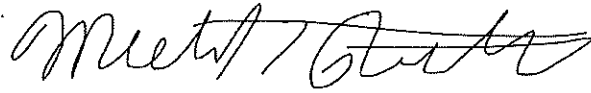


\_\_\_\_\_  
Nathan Van Embden, Esquire  
Attorney for Plaintiff

VERIFICATION OF PLAINTIFF

1. I certify that I am the Mayor of the Township of Downe, Plaintiff, in the foregoing Verified Complaint to which this is annexed.
2. I have read the Verified Complaint and the information contained therein and I hereby attest to the truthfulness based upon my personal knowledge.

Dated: 11/24/2025

A handwritten signature in black ink, appearing to read "Michael Rothman", written over a horizontal line.

Michael Rothman, Mayor of Township of Downe,  
Plaintiff

# Civil Case Information Statement

## Case Details: CUMBERLAND | Civil Part Docket# L-000832-25

**Case Caption:** TONWSHIP OF DOWNE VS  
CUMBERLAND COUNTY

**Case Initiation Date:** 11/24/2025

**Attorney Name:** NATHAN VAN EMBDEN

**Firm Name:** NATHAN VAN EMBDEN

**Address:** 21 EAST MAIN STREET P. O. BOX 428

MILLVILLE NJ 08332

**Phone:** 8563274220

**Name of Party:** PLAINTIFF : Tonwship of Downe

**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** ELECTION LAW

**Document Type:** Order to Show Cause

**Jury Demand:** NONE

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by: Tonwship of Downe?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** YES

**If yes, is that relationship:** Business

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO  
Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

11/24/2025  
Dated

/s/ NATHAN VAN EMBDEN  
Signed