

October 20, 2025

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BY eCOURTS & OVERNIGHT FEDEX

Chief Justice Stuart Rabner and Associate Justices

New Jersey Supreme Court

Richard J. Hughes Justice Complex

25 Market Street

P.O. Box 970

Trenton, New Jersey 08625

Re: *New Jersey Division of Child Protection and Permanency v. A.R. and P.W.*,

S. Ct. Docket No. 091230

***Amicus Curiae* Letter Brief in Support of Motion of Appellant-Movant J.R. for Leave to Appeal**

Dear Justices of the New Jersey Supreme Court:

We serve as *pro bono* counsel to the national and state child-advocacy non-profit organizations listed in Appendix A to the certification I respectfully submit along with this letter brief in lieu of a formal brief (together, the “Child-Advocacy Amici”). *See* R. 2:6-2(b), 2:6-4(a), and 2:8-1(a). On behalf of the Child-Advocacy Amici, we respectfully request that the Court grant the Motion of Appellant-Movant J.R. for Leave to Appeal and for Child-Advocacy Amici to appear and participate in the matter referenced above.

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The issues raised in this case are of profound importance not only to foster children in New Jersey, but also to foster children nationwide who receive federal benefits while in state foster-care systems, due to their own disability (SSI benefits) or due to the death of a parent (survivor's OASDI benefits). Federal law requires that these benefits be utilized in the child's best interests.¹ But the State of New Jersey, through its foster care agency, the Division of Child Protection and Permanency (the "Division"), has enacted a policy that runs contrary to those interests. After becoming a foster child's representative payee ("RP"), a fiduciary role, the State uses the foster child's benefits to reimburse itself for the child's basic care, rather than using those benefits for a child's current special needs, or conserving them so that they are available when the child ages out of foster care. This policy is by no means required by federal law, and it is in fact contrary to New Jersey law.

¹ Benefits may be used "only for the use and benefit of the beneficiary.... A payee must use benefits to provide for the beneficiary's current needs... or for reasonably foreseeable needs. If not needed for these purposes,... the payee must conserve or invest benefits on behalf of the beneficiary." Soc. Sec. Admin., *Program Operations Manual System (POMS) GN 00602.001, Use of Benefits*, <https://secure.ssa.gov/apps10/poms.nsf/lnx/0200602001> (last visited Oct. 19, 2025).

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This issue is of paramount importance to scores of foster children in New Jersey who are receiving or will receive these federal benefits. Nationally, based on the most recently available data, approximately 5.3% of all foster children receive SSI or OASDI benefits, and an estimated 10% or more are eligible for them.² As of December 2024, New Jersey had 2,937 children in foster care.³ In New Jersey, 203 foster children currently receive OASDI or SSI benefits.⁴ Thus, the State's policy of self-reimbursement currently affects over 200 of its most vulnerable foster children and will affect hundreds more in the future.

² Cong. Res. Serv., *Children in Foster Care and Social Security Administration Benefits: Frequently Asked Questions* 8, 24 (2021), <https://www.congress.gov/crs-product/R46975> (noting that one study estimated that 20% of foster children have qualifying disabilities); see also Eli Hager & Joseph Shapiro, *State Foster Care Agencies Take Millions of Dollars Owed to Children in Their Care*, NPR (Apr. 22, 2021), <https://www.npr.org/2021/04/22/988806806/state-foster-care-agencies-take-millions-of-dollars-owed-to-children-in-their-ca>.

³ Rutgers Univ. Sch. of Soc. Work, *Children in Placement – Point in Time*, <https://njchilddata.rutgers.edu/portal/children-in-placement> (last visited Oct. 16, 2025).

⁴ See N.J. Dep't of Child. & Fams., *Social Security or Insecurity: The End of Children Paying for Foster Care in New Jersey* (slide presentation, N.J.'s Annual Children in Court Conf. 2025).

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Moreover, depriving foster children of access to their own funds has a tremendous immediate and long-term impact on them. For example, it is well understood that children aging out of the foster care system are at a crucial crossroads. Many of them “struggle to find their footing once they leave care, experiencing negative outcomes in a range of areas.”⁵ Approximately 29% of youth who remain in foster care beyond their 17th birthday experience homelessness between the ages of 19 and 21.⁶ Less than 3% eventually obtain bachelor’s degrees.⁷ Not only may these children require access to their benefits to address their special needs that the state does not meet, but these benefits can also provide an irreplaceable lifeline for a child leaving the foster care system. In recognition of the importance of foster children having access to their own federal benefits, ten states (Arizona, Illinois, Kansas, Maryland, Massachusetts,

⁵ Peggy Kelly, *Risk and Protective Factors Contributing to Homelessness Among Foster Care Youth: An Analysis of the National Youth in Transition Database*, 109 Child. & Youth Servs. Rev. 104589 (2020), <https://doi.org/10.1016/j.chilyouth.2019.104589>.

⁶ *Id.*

⁷ Molly Sarubbi et al., Education Comm’n of the States, *Strengthening Policies for Foster Youth Postsecondary Attainment* (2016), <https://files.eric.ed.gov/fulltext/ED570481.pdf>.

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Missouri, Nevada, New Mexico, Ohio, and Oregon) and the District of Columbia have enacted legislation or issued rules to prohibit or limit this practice.⁸

These legal issues frequently arise in foster children’s Family Part cases. More than ten similar cases are currently pending in the Appellate Division. *See, e.g., N.J. Div. of Child Prot. & Permanency v. J.L.P. & B.J.W.*, No. A-000097-24T2 (N.J. Super. Ct. App. Div.); *N.J. Div. of Child Prot. & Permanency v. A.R. & P.W.*, No. A-003075-23T1 (N.J. Super. Ct. App. Div.). Recognizing the recurring nature of these legal issues, on October 16, 2025, the Appellate Division ordered eight related cases to be calendared as back-to-back appeals before the same panel. *See N.J. Div. of Child Prot. & Permanency v. D.K.L.H. & T.T.H., Sr., I/M/O T.T.H. Jr. & C.C.P.H.*, No. A-003391-23T2 (N.J. Super. Ct. App. Div. Oct. 16, 2025) (order granting motion to consider related cases back-to-back). By granting certification here, this Court would provide

⁸ *See, e.g.,* Ariz. Rev. Stat. Ann. § 8-468 (2025) (requiring that federal benefits be saved for children’s own use when they exit foster care instead of being used to pay for the cost of care while in Department of Child Safety’s custody); Md. Code Ann., Fam. Law § 5-527.1(c) (2025) (requiring the Department of Human Services, when serving as representative payee for a child’s federal benefits, to allocate an increasing percentage of benefits for the child’s needs rather than reimbursing the State for care costs).

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much-needed clarity not only on the statutory and constitutional issues presented, but also to guide the resolution of numerous pending cases in New Jersey courts where foster children are challenging the State's diversion of their federal benefits.

In this case, J.R. was a foster child who received OASDI benefits after her father's death. Rather than conserving these benefits so that they were available to J.R. when she aged out of the foster care system, the Division took all of J.R.'s benefits to reimburse itself for her basic care. Through her Law Guardian, J.R. sought review of this taking in the Family Part, arguing that New Jersey statutes require the State to pay for the maintenance of children in its custody and that the Division's interception of her benefits for that purpose was therefore unlawful.

New Jersey's statutory scheme is clear that the State, not the child, is responsible for the cost of maintaining children in foster care. At the time of the proceedings below, it expressly required the State to seek reimbursement only from "responsible parties," and only adults, not children, can be responsible

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parties. N.J.S.A. 30:4C-29.1.⁹ Although N.J.S.A. 30:4C-22 authorizes the Division, in its discretion, to apply a child's funds toward maintenance in certain limited circumstances, it expressly prohibits doing so when the funds are held in the corpus of a trust. As the foster children's fiduciary, the Division holds their federal benefits in trust and must use the funds in the children's best interest. Thus, the State has no legal right under New Jersey law to use its control over foster children's property to reimburse itself for the cost of their care. Indeed, because children are not responsible parties, the State is expressly barred from doing so.

This is consistent with the general statutory framework. The Division is authorized to make payments for maintenance from the funds appropriated by the Legislature. N.J.S.A. 30:4C-29. N.J.S.A. 30:4C-27, -29, and -30 place the duty of maintenance squarely on the State and county treasuries, which amplifies the statutory prohibition. Read together, these provisions make clear that the Legislature intended the State to bear the financial responsibility for providing

⁹ Section 29.1 was repealed earlier this year to prevent the Division from seeking reimbursement from responsible persons. This repeal reinforces the impropriety of the policy of self-reimbursement from foster children.

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maintenance to a child in foster care, and to permit use of a child's funds only as a narrow exception, not as a general reimbursement policy. *See* N.J.S.A. 30:4C-22; N.J.S.A. 30:4C-29.1; N.J.S.A. 30:4C-31; N.J.S.A. 30:4C-56. The statutory framework reflects a deliberate legislative choice: when the State assumes custody of a child, it also assumes full financial responsibility for that child's care.

Despite that strong statutory mandate and specific exclusion, the Appellate Division rejected J.R.'s challenge and held that the Family Part lacked jurisdiction to review the Division's use of J.R.'s survivor benefits because J.R. failed to administratively challenge at the federal level how her federal benefits were being used in accordance with federal regulations. In doing so, the court treated the case as a federal "payee appointment" dispute, even though the Division's appointment as RP was not at issue, and concluded that federal remedies need to be exhausted before any further challenge can be raised in state court. But no federal remedy is available here. The Social Security Act expressly prohibits SSA from requiring state and local agencies from returning funds that they misused. *See* 42 U.S.C.A. §§ 405(j)(1)(A), 405(j)(7)(A). Moreover, J.R.'s claim arises under state law, not federal law, and federal

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agencies lack jurisdiction to adjudicate alleged state-law violations by state agencies. Thus, the ruling leaves children like J.R. without a state forum to vindicate their property and statutory rights, as the SSA does not, and cannot, adjudicate questions of New Jersey law.

J.R.'s petition presents three important issues, all warranting review: First, whether federal administrative remedies must be exhausted before New Jersey courts can enforce New Jersey statutes. The answer is no. The SSA is prohibited from compelling the Division to repay J.R., and it has no power to determine whether the Division's diversion of benefits violates New Jersey's statutory scheme, which places responsibility for the cost of foster care on the State itself and prohibits the Division from using benefits it holds in trust for its own self-reimbursement. The Appellate Division erred in insisting that J.R. pursue federal remedies that do not exist and proceed in a federal forum that cannot hear her state-law claims. *See Abbott v. Burke*, 495 A.2d 376, 391 (1985) (explaining exceptions to the exhaustion doctrine include "when the administrative remedies would be futile"); *Deal Gardens, Inc. v. Bd. of Trs.*, 226 A.2d 607, 611 (1967) (holding that plaintiff was not required to exhaust its remedy before the board of adjustment because doing so would have been

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futile); *Rumana v. Cty. of Passaic*, 936 A.2d 971, 981 (Super. Ct. App. Div. 2007) (“[W]here the issue is a question of law and the application of administrative expertise is not required, the interests of justice and expediency negate the requirement of exhaustion.”); *cf.* N.J. Ct. R. 4:69-5 (“Except where it is manifest that the interest of justice requires otherwise, actions under R. 4:69 shall not be maintainable as long as there is available a right of review before an administrative agency which has not been exhausted.”); N.J. Ct. R. 2:2-3 (authorizing appellate review of decisions of state administrative agencies unless administrative remedies remain, “unless the interest of justice requires otherwise”). In other words, the Appellate Division’s decision requires foster children to pursue a federal administrative remedy that federal law expressly denies them. Forcing children to exhaust SSA remedies in this context effectively insulates the Division from judicial review of its compliance with New Jersey’s child welfare laws and deprives J.R. of a forum for redress, a clear denial of the core elements of due process: the rights to be heard and seek redress.

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Second, the Appellate Division incorrectly interpreted New Jersey state law. As discussed above, the combination of N.J.S.A. 30:4C-22 and 29.1 prohibited the Division from seeking reimbursement from foster children. N.J.S.A. 30:4C-27, -29, and -30 make clear that the State, not children in foster care, must bear the costs of maintenance. By allowing the Division to treat J.R.'s survivor benefits as reimbursement for state obligations, the decision below undermines this legislative mandate and diminishes the rights of children in out-of-home placement. This is not merely a technical dispute about funding streams; it is about whether foster children have meaningful rights to their own property while under state supervision.

Finally, the case raises constitutional concerns of due process and equal protection. Children in foster care who receive survivor or disability benefits are treated as second-class citizens by the State. Many of these children are disabled or orphaned, yet, instead of protecting their benefits for future needs, the Division diverts those funds to reimburse itself for foster care costs. No similar policy exists to seize the assets of non-disabled or non-orphaned children, such as wages from part-time jobs or inheritances. The result is that children with federal benefits are singled out to pay for their own foster care,

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while their peers without federal benefits receive the full value of state support. This disparate treatment discriminates against the most vulnerable children in New Jersey's foster care system and violates equal protection, while the lack of notice and meaningful opportunity to challenge the Division's actions raises serious due process concerns. Cases in other states have been addressing aspects of these issues; New Jersey needs to do the same.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Patrick J. Boyle
Patrick J. Boyle
(Attorney No. 036081997)

cc: All Counsel of Record (by eCourts only)

Certification that Submission Contains No Confidential Information or Confidential Personal Identifiers

This form shall be completed by any party who files a document in a public court matter in the Supreme Court or in the Appellate Division of the Superior Court.

1. Confidential information / confidential personal identifiers (must select one):

I certify that I have reviewed Rules 1:38-3, 1:38-5, and 1:38-7 and:

- This document does not contain any confidential information or any confidential personal identifiers; **OR**

- This document; previously contained confidential information or confidential personal identifiers, which have been redacted (meaning removed or made anonymous by using fictitious first names or initials, where applicable). The cover of the redacted version of the document contains the word "REDACTED." I acknowledge that a non-redacted version must be filed simultaneously with the redacted version in matters where the confidential information is necessary to the disposition of the matter: **OR**

- This document contains confidential information, but redaction is not required because the document is excluded from public access pursuant to court order, Rule, statute, or other authority. If applicable, skip paragraphs 2 and 3.

2. Return and resubmission:

I certify that if any confidential information is discovered in this submission and brought to the court's attention, the court will return the document to me, and I will be responsible to redact or remove the confidential information before resubmission. I understand the court could impose sanctions, including suppression of the brief, dismissal in extraordinary cases, and other measures for a failure to accurately make this certification or for the discovery of confidential information in a document that has been filed.

3. Briefs posted online:

I understand that the presence of confidential information or confidential personal identifiers in a document that has been posted on the Judiciary's public website will be grounds for the removal of such online posting, pending correction by the filing party, on an expedited timeline. The court in its discretion could postpone further proceedings pending the resubmission of the document.

This certification pertains to the following documents included in this filing:

AMICUS CURIAE BRIEF (MOTION +F FOR LEAVE TO APPEAR AMICUS CURIAE) (LETTER), MOTION FOR LEAVE TO APPEAR AMICUS CURIAE, AFFIDAVIT/CERTIFICATION IN SUPPORT

I certify that the forgoing 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.

10/20/2025

Date

S/ PATRICK J BOYLE, Esq.

Signature

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SUPREME COURT OF NEW JERSEY

APP. DIV. # **A-003075-23**

SUPREME COURT # **091230**

New Jersey Division of
Child Protection and
Permanency,
Plaintiff,
v.
A.R. and P.W.,
Defendants,

NOTICE OF MOTION
MOTION FOR LEAVE TO APPEAR AMICUS
CURIAE

In the Matter of J.R.,
a minor,
Appellant-Movant,
and
M.W., a minor.

PLEASE TAKE NOTICE THAT CHILDREN'S ADVOCACY INSTITUTE, CHILDREN'S RIGHTS, FACING FOSTER CARE IN ALASKA, JUVENILE LAW CENTER, LAWYERS FOR CHILDREN, LEGAL AID SOCIETY, NATIONAL CENTER FOR THE RIGHTS OF ABUSED CHILDREN, NATIONAL FOSTER YOUTH INSTITUTE, AND NEBRASKA APPLESEED CENTER FOR LAW IN THE PUBLIC INTEREST, BY AND THROUGH THEIR UNDERSIGNED COUNSEL, HEREBY MOVE BEFORE THE SUPREME COURT OF NEW JERSEY UNDER R. 1:13-9 FOR LEAVE TO PARTICIPATE AND APPEAR IN THIS ACTION AS AMICUS CURIAE.

PLEASE TAKE FURTHER NOTICE THAT IN SUPPORT OF THIS MOTION, MOVANTS SHALL RELY UPON THE ENCLOSED CERTIFICATION OF PATRICK J. BOYLE, ESQ., DATED OCTOBER 20, 2025.

PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO AND IN ACCORDANCE WITH R. L:13-9(E), A COPY OF THE PROPOSED AMICUS CURIAE LETTER BRIEF IS BEING SUBMITTED HEREWITH.

Attorney for CHILD-ADVOCACY

Dated: 10/20/2025

S/ PATRICK J BOYLE

VENABLE LLP

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*Pro Bono Counsel for Proposed
Child-Advocacy Amicus Curiae*

NEW JERSEY DIVISION OF
CHILD PROTECTION AND
PERMANENCY,

Plaintiff-Respondent,

v.

A.R. and P.W.,

Defendants,

In the Matter of J.R.,
a minor,

Appellant-Movant,

and

M.W., a minor.

SUPREME COURT OF NEW JERSEY
DOCKET NO.: 091230

CIVIL ACTION

APPELLATE DIVISION DOCKET
NO. A-3075-23

SAT BELOW:

HON. ROBERT L. GILSON, P.J.A.D.

HON. AVIS BISHOP-THOMPSON,
J.A.D.

HON. LORRAINE M. AGOSTINI,
J.A.D.

TRIAL COURT DOCKET
NO. FN-03-0139-23

CERTIFICATION OF PATRICK J. BOYLE

I, PATRICK J. BOYLE, hereby certify as follows:

1. I am a partner with the law firm Venable LLP, *pro bono* counsel to the national and state child-advocacy non-profit organizations listed in Appendix A to this certification (the “Proposed Child-Advocacy *Amici*”).

2. I respectfully submit this Certification in support of the Proposed Child-Advocacy *Amici*’s motion for leave to participate and appear in this matter as *amicus curiae*.

3. As discussed in the Proposed Child-Advocacy *Amici*’s letter brief accompanying this motion, the issues raised in this case are of profound importance not only to foster children in New Jersey, but also to foster children nationwide who receive federal benefits while in state foster-care systems, due to their own disability or due to the death of a parent. After becoming a foster child’s representative payee, a fiduciary role, the State of New Jersey uses the foster child’s benefits to reimburse itself for the child’s basic care, rather than using those benefits for a child’s current special needs or conserving them so that they are available when the child ages out of foster care. This case challenges the legality of that practice and therefore could have significant impact for foster children nationwide.

4. As addressed in more detail in the accompanying appendix, the Proposed Child-Advocacy *Amici* are well-versed and uniquely situated to offer

this Court insight and perspective on the importance of granting Appellant-Movant J.R.'s pending motion for leave to appeal and addressing the issues raised by that appeal.

5. The Proposed Child-Advocacy *Amici* are non-profits that specialize in youth advocacy and defending the rights of children, several of which with a particular focus on foster care, in states and jurisdictions across the country.

6. If the Court grants the Proposed Child-Advocacy *Amici* leave to participate and leave to Appellant-Movant J.R. to appeal, the Proposed Child-Advocacy *Amici* will file an additional brief on the merits of the appeal and issues raised by that appeal.

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: October 20, 2025

By: /s/ Patrick J. Boyle
Patrick J. Boyle (ID# 036081997)

APPENDIX A TO BOYLE CERTIFICATION: LIST OF AMICI ORGANIZATIONS SIGNING AMICI LETTER AND STATEMENTS OF ORGANIZATIONAL INTEREST

Children's Advocacy Institute (CAI).

Children's Advocacy Institute, founded at the nonprofit University of San Diego School of Law in 1989, is an academic, research, and advocacy nonprofit organization working to improve outcomes for children and youth, with special emphasis on improving the child protection and foster care systems. In its academic component, CAI trains law students and attorneys to be effective child advocates, and its research and advocacy, conducted in offices in San Diego, Sacramento, and Washington, D.C., leverage change for children and youth through impact litigation; regulatory, administrative and legislative advocacy; and public education. CAI has advocated for federal, state, and local reform to preserve the federal benefits of foster youth for 17 years.

Children's Rights.

Children's Rights is a national organization committed to improving the lives of children who are in or impacted by government child-serving systems. Through advocacy and legal action, Children's Rights investigates, exposes, and combats violations of the rights of children, and holds governments accountable for keeping kids safe, healthy, and supported. For 30 years, Children's Rights has achieved lasting, systemic change for hundreds of thousands of children across more than 20 jurisdictions throughout the United States. Children's Rights has specific experience related to improving the array of placements and services for older youth in the foster care system, including those designed to prevent grave outcomes for youth when they exit the foster care system.

Facing Foster Care in Alaska (FFCA).

Facing Foster Care in Alaska is a lifeline for Alaska foster youth and alumni. A statewide network of current and former foster youth, it leads efforts in advocacy, training, and peer support to improve the lives of thousands of foster youth across Alaska. FFCA empowers current and former foster youth to share their lived-expertise to be heard in key decisions affecting children and families. It advocates for the rights of

Alaska foster youth to obtain and utilize their federal benefits to meet current and future needs.

Juvenile Law Center (JLC).

Juvenile Law Center fights for rights, dignity, equity, and opportunity for youth. It works to reduce the harm of the child welfare and justice systems, limit their reach, and ultimately abolish them so all young people can thrive. Founded in 1975, JLC is the first non-profit public interest law firm for children in the country. Its legal and policy agenda is informed by—and often conducted in collaboration with—youth, family members, and grassroots partners. Since its founding, JLC has filed influential amicus briefs in state and federal courts across the country to ensure that laws, policies, and practices affecting youth advance racial and economic equity and are consistent with children’s unique developmental characteristics and human dignity.

Lawyers For Children (LFC).

Lawyers for Children is a not-for-profit legal corporation dedicated to protecting the rights of individual children in foster care in New York City and compelling system-wide child welfare reform in New York State and throughout the country. This year, our attorney-social worker teams will represent children and youth in more than 5,000 proceedings in New York City Family Courts. In addition, LFC publishes guidebooks and other materials for both children and legal practitioners, conducts professional legal and social work training sessions, and works to reform systems affecting vulnerable children through legislative advocacy and impact litigation. LFC’s experience, expertise and insight as amicus curiae on matters pertaining to court-involved children has been accepted by state and federal courts throughout the country. LFC’s insight into the issues in this matter is borne of more than 40 years’ experience acting as court-appointed attorneys for children in matters pertaining to their care and custody.

Legal Aid Society

The Legal Aid Society is the nation’s largest and oldest provider of legal services to low-income families and individuals. The Society operates three major legal practices – Civil, Criminal and Juvenile Rights – providing comprehensive legal services throughout New York City. The

Legal Aid Society's Juvenile Rights Practice (JRP) represents approximately 90 percent of the children who appear before the New York City Family Courts in all five boroughs, typically serving as the attorney-for-the-child in approximately 30,000 proceedings annually. JRP represents children in proceedings dealing with allegations of abuse, neglect, juvenile delinquency, Persons in Need of Supervision, and other proceedings affecting children's rights and welfare. Its office represents most children placed in foster care in New York City, many of whom are or have been eligible for Supplemental Security Income and Old-Age, Survivors, and Disability Insurance. Collectively, its clients have had millions of dollars in federal benefits rerouted to pay for the foster care system. In addition to representing many thousands of children each year in trial and appellate courts, The Legal Aid Society pursues impact litigation and other law reform initiatives on behalf of our clients.

National Center for the Rights of Abused Children.

The Center for the Rights of Abused Children is a national public interest law firm that defends the constitutional and property rights of children in foster care. The Center has led successful reforms in Arizona, Colorado, Kansas, and Missouri to stop state agencies from seizing foster children's Social Security benefits and regularly trains attorneys and judges on safeguarding foster youths' Social Security benefits and property rights.

National Foster Youth Institute (NFYI).

The National Foster Youth Institute is a nonprofit organization dedicated to ensuring that current and former foster youth have a voice in shaping the policies and systems that affect their lives. NFYI has a strong interest in this case because the financial security and equitable treatment of current/former foster youth are central to its mission.

Nebraska Appleseed Center for Law in the Public Interest.

The Nebraska Appleseed Center for Law in the Public Interest is a public interest, legal advocacy organization that works to improve a variety of public systems Nebraskans interact with through community, policy, and legal advocacy. This includes over twenty years of extensive advocacy specifically focused on improving Nebraska's child welfare system to ensure families interacting with it have meaningful access to the supports and services they are entitled to receive. Recently, this has included

passing multiple pieces of legislation to increase the rights of Nebraska's foster youth receiving Social Security benefits and helping attorneys and child welfare professionals implement those in individual cases.

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SUPREME COURT OF NEW JERSEY
APP. DIV. # A-003075-23
SUPREME COURT # 091230

CRIMINAL ACTION

New Jersey Division of
Child Protection and
Permanency,
Plaintiff,
v.
A.R. and P.W.,
Defendants,

CERTIFICATION OF SERVICE

In the Matter of J.R.,
a minor,
Appellant-Movant,
and
M.W., a minor.

I hereby certify that the following documents, MOTION FOR
LEAVE TO APPEAR AMICUS CURIAE, AFFIDAVIT/CERTIFICATION IN SUPPORT,
AMICUS CURIAE BRIEF (LETTER), CERTIFICATION OF CONFIDENTIAL
IDENTIFIERS were submitted and transmitted to the parties listed
below in the following format:

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The firm address appearing in red cannot be validated with the Judiciary's Central Attorney Management System and is, therefore, reflecting the last known address on file.

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.

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Dated: 10/20/2025