

# THE NJSBA DOCKET



April 30, 2026



## Hello friends,

Welcome to the latest issue of *The NJSBA Docket*, a monthly bulletin with news from the legal community and Association highlights.

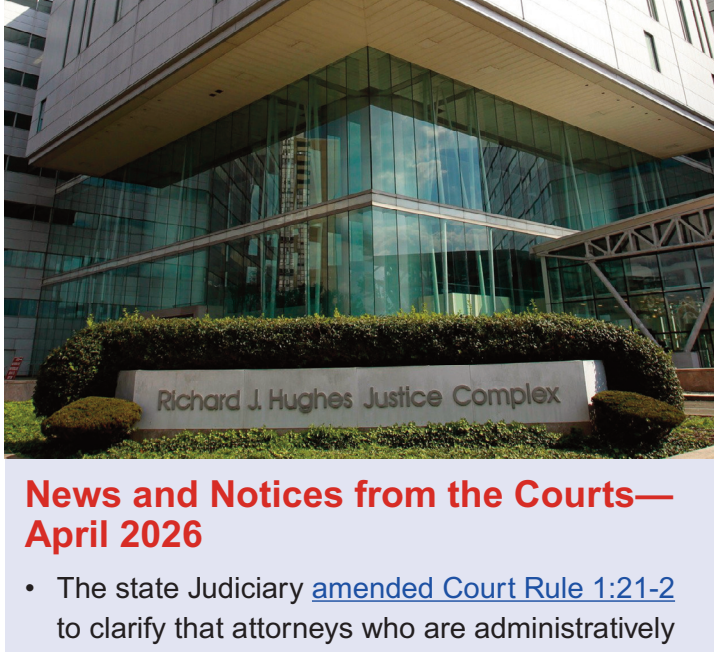
Be sure to check out the [calendar](#) for our lineup of educational offerings and networking opportunities. Here's a primer of what we have in store for the coming weeks, as well as the latest court notices from the Judiciary:



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## News and Notices from the Courts—April 2026

- The state Judiciary [amended Court Rule 1:21-2](#) to clarify that attorneys who are administratively ineligible to practice in New Jersey for failure to pay their Lawyers' Fund for Client Protection assessment cannot appear *pro hac vice*.
- The Judiciary issued [amendments to Rule 3.17](#) of the Code of Judicial Conduct governing disqualification.
- The Judiciary adopted rules changes to [child support guidelines](#) that will take effect on June 1.
- The Judiciary issued [amendments to Court Rules 1:20-15 and 1:20-15B](#) establishing term limits for members of the Disciplinary Review Board and Attorney Regulatory Board.
- The New Jersey Division of Law [invites applications](#) from law firms willing to represent the state as outside counsel in employment litigation matters.
- The state Supreme Court will hold an in-person [public hearing](#) on May 18 to cover Supreme Court Committee reports for the Civil Practice and Tax Court Committees, along with the Midcycle Report from the 2025-2027 Committee on the Rules of Evidence.
- The state Judiciary invites the legal community to attend its annual [Attorney Well-Being in Law Program](#) on May 28. This year's program will feature judges and attorneys from a range of practice settings who will share practical strategies to promote and sustain work-life balance in chambers, offices and firms. The program is presented in hybrid real-time format with limited on-site in-person seating at the Richard J. Hughes Justice Complex in Trenton and remote attendance via Zoom.
- The Judiciary issued a [directive](#) clarifying FN docket procedure for Title 30 summary hearings to determine whether a child's health, safety or well-being is at risk.



## Register for the 2026 NJSBA Annual Meeting and Convention

Don't miss the [premier annual event](#) of the New Jersey legal community. Take part in unparalleled educational and networking opportunities at the 2026 NJSBA Annual Meeting and Convention on May 13-15 at the Borgata Hotel, Casino & Spa in Atlantic City.



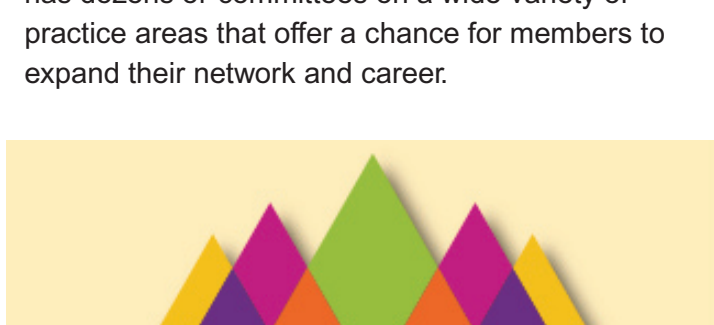
## NJSBA PracticeHQ Presents 60 Legal Tech Tips, Tricks, Gadgets and Websites in 60 Minutes

Join the NJSBA on May 6 for a [free lunchtime webinar](#) on the latest legal-specific tech, gadgets and utilities to help attorneys improve their practice.



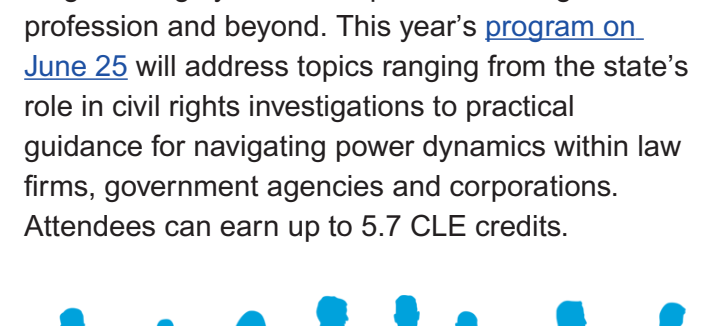
## Join an NJSBA Committee to Connect with Members and Expand Your Practice

NJSBA President-Elect Norberto A. Garcia invites members to [seek appointment](#) to the Association's committees for the 2026-27 bar year. The NJSBA has dozens of committees on a wide variety of practice areas that offer a chance for members to expand their network and career.



## NJSBA Diversity Summit Returns for 2026—Earn up to 5.7 Credits

The NJSBA Diversity Summit is a premier educational and networking event exploring power, justice and accountability within the context of longstanding systemic inequities in the legal profession and beyond. This year's [program on June 25](#) will address topics ranging from the state's role in civil rights investigations to practical guidance for navigating power dynamics within law firms, government agencies and corporations. Attendees can earn up to 5.7 CLE credits.



## Members in Motion

*New Jersey State Bar Association members form the core of the state's legal community. Read on for updates about the latest moves among members. Please share news about NJSBA members with [askthenjsba@njsba.com](#).*

Connell Foley LLP in Roseland added the following partners:

- **Abbey True Harris** joined as partner in the regulatory affairs and compliance group.
- **Samantha Diorio**, who will focus on complex commercial litigation, aviation and insurance matters as well as toxic torts and workplace discrimination.
- **Alexa Salcito**, who practices in commercial litigation, work in white-collar crime, cannabis, and insurance coverage.
- **Justin Vogel**, who practices in transportation law including catastrophic loss and emergency response as well as product liability, tort law and franchise breaches.
- The firm also welcomed **Carmel Joy Decker** who joined the firm's labor and employment law practice group.

**Sara Quigley**, former chief of staff to state Attorney General, joined Stevens & Lee Companies in Princeton as a shareholder and will serve as a managing director of Stevens & Lee Public Affairs.

**Amanda C. Wolfe** joined Norris McLaughlin P.A. in Bridgewater as a member of the firm in its real estate, finance, and land use and municipal law practice groups.

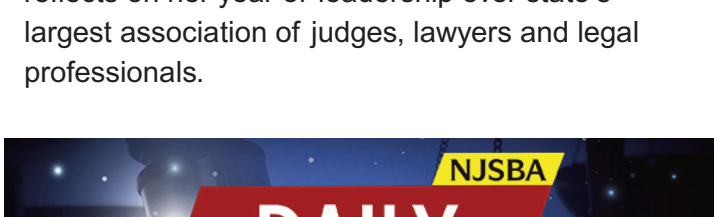
Sills Cummins & Gross P.C. in Newark added the following attorneys:

- **Michael J. Donnelly** is now of counsel to the firm's taxation and eminent domain practice group within its real estate department.
- **Charles W. Mondora** joined the firm's litigation department, where he focuses on complex business litigation and commercial disputes.
- **Steven S. Fernandez** joined as an associate in the firm's litigation department and will focus on complex commercial disputes.



## 'One Year, One Mission': NJSBA President Christine A. Amalfe Reflects on a Year of Service

Read outgoing NJSBA President Christine A. Amalfe's [farewell message](#) to members as she reflects on her year of leadership over state's largest association of judges, lawyers and legal professionals.



## Top News Stories for April

*Catch up on the top Daily Briefing articles of the month.*

### Key Justices Appear Skeptical of Limiting Birthright Citizenship

A majority of the U.S. Supreme Court appeared skeptical of President Trump's efforts to limit [birthright citizenship](#). Justices raised doubts about the constitutionality of the president's executive order that would end automatic citizenship for children born on U.S. soil to undocumented immigrants and some temporary foreign visitors.

### Lawsuits Over Sex Abuse of Children in State Custody Could Cost NJ \$340M+

[Ongoing lawsuits](#) filed by people who say they were sexually abused as children while in juvenile detention centers, foster care, and other state-supervised placements could cost New Jersey at least \$340 million, judging by past payouts.

### New Jersey Cannot Regulate Kalshi's Prediction Market, US Appeals Court Rules

A federal appeals court ruled that [New Jersey gaming regulators](#) cannot prevent Kalshi from allowing people in the state to use its prediction market to place financial bets on the outcome of sporting events. The three-judge panel of the 3rd U.S. Circuit Court of Appeals ruled 2-1 in finding that the U.S. Commodity Futures Trading Commission has exclusive jurisdiction over the sports-related event contracts that Kalshi allows people to trade on its platform.

### U.S. Supreme Court Wrangles With Police Use of Cell Location Data to Find Suspects

In two hours of oral arguments, the U.S. Supreme Court [debated](#) how the Constitution's traditional protections apply to the rapidly changing technology that has made it easier for the police to scoop up vast amounts of data to assemble a detailed look at a person's movements and activities.

### NJ Spent \$54M on Outside Lawyers Last Year, Prompting Lawmaker's Concern

New Jersey's law division spent almost [\\$54 million](#) on outside counsel last year, according to [eyebrows](#) among legislators looking for ways to scale back spending amid ongoing budget discussions.



## Supreme Court, Appellate and Third Circuit Decisions—April 2026

### U.S. Court of Appeals for the Third Circuit

#### Gambling—Sports Betting

[Kalshix LLC v. Mary Jo Flaherty](#)—KalshiEX LLC (Kalshi) moved preliminarily to enjoin the New Jersey Division of Gaming Enforcement from enforcing state law against Kalshi's sports-related event contracts. The District Court granted Kalshi's motion. The Third Circuit affirmed, holding that Kalshi demonstrated a reasonable chance of success on its argument that the Commodity Exchange Act preempts otherwise applicable state law.

#### Business—Injunctive Relief

[Johnson & Johnson v. Samsung Bioepis Co Ltd](#)—The Third Circuit affirmed the denial of relief, agreeing that Janssen failed to establish irreparable harm. The Third Circuit wrote: Rarely do courts grant injunctive relief before the plaintiff secures a judgment. And even more rarely is that relief granted in contract cases, where it is usually the case that monetary damages can later be quantified, so the plaintiff's injury does not qualify as "irreparable harm." Nevertheless, in some contexts, the Third Circuit has recognized that the complexity or risk of permanent alteration of a given market can make ascertaining legal loss impossible and thus render monetary damages impractical. In the present case, the appellants Johnson & Johnson and Janssen Biotech, Inc. claimed that appellee Samsung Bioepis Co., Ltd. issued a license to a subsidiary of the Cigna Group in violation of Samsung's contract with Janssen, and that a preliminary injunction should issue against Samsung because the harms to Janssen would otherwise be irreparable.

#### Bankruptcy—Mass-Tort Bankruptcy

[In re: Whittaker Clark & Daniels Inc.](#)—Plagued by tort claims related to their historical production, storage, and distribution of asbestos-laden talc, Whittaker, Clark & Daniels, Inc. and three of its affiliates filed for bankruptcy in 2023. However, as is often the case in mass-tort bankruptcies, their proceedings were contested from the start. On appeal, the appellants—the receiver appointed for Whittaker by a South Carolina Court and the Official Committee of Talc Claimants—contested whether Whittaker's Chapter 11 petition was improperly filed. If the debtors rightly entered bankruptcy, the Committee further contended certain successor liability claims that have been or could be asserted against a third-party purchaser belong exclusively to its constituent talc creditors. The Third Circuit concluded that Whittaker properly filed for bankruptcy, and the successor liability claims the talc creditors seek to assert against the purchaser are property of the Debtors' bankruptcy estates. Accordingly, the Third Circuit affirmed the lower court.

### New Jersey Supreme Court

#### Criminal—Cell Site Location Information Evidence

[State v. Jule Hannah \(Cumberland County and Statewide\)](#)—The Supreme Court considered whether a lay witness can testify regarding cell site location information specifically, the locations of cell towers that cell phones connect to, or whether an expert witness is required. The Court held that, pursuant to N.J.R.E. 702, cell site location information involves technical and specialized knowledge that must be presented to a jury by an expert witness at trial.

#### New Jersey Appellate Division

##### Criminal—Other Crimes Evidence

[State of New Jersey vs. Eric T. Seddens \(Camden County and Statewide\)](#)—In considering the defendant's manslaughter conviction, the Appellate Division weighed the admissibility of "other crimes" evidence about the defendant's aggravated assault of the same victim at the same location two years earlier. The state to prove his motive and identity as the homicide perpetrator. The defendant argued the court misapplied Rule 404(b) and abused its discretion in admitting proof of the prior assault. He contended the two offenses are not "signature

crimes" and that that state had ample, less inflammatory evidence to establish both his identity and alleged motive to kill the victim. Alternatively, even if the Rule 404(b) proof is deemed admissible for those purposes, he asserted the trial court should have sanitized it to omit highly prejudicial details. The Appellate Division affirmed the trial court's application of Rule 404(b) in these circumstances.

##### Criminal—Miranda Rights

[State of New Jersey vs. Christopher Reynoso \(Passaic County and Statewide\)](#)—The appeal, which arose from a jury trial murder conviction, addressed the constitutional rights of juvenile interrogees, focusing on whether the state proved beyond a reasonable doubt the voluntariness of the defendant's initial waiver of Miranda rights and the ensuing statements he made before eventually invoking those rights. The defendant Christopher Reynoso appealed his jury trial convictions for murder, attempted murder and weapons offenses stemming from a May 2017 drive-by shooting. The Appellate Division held that the state did not meet its burden of proving voluntariness beyond a reasonable doubt. The Appellate Division vacated the defendant's convictions and remanded for a new trial.

##### Criminal—Expungement

[In the Matter of the Expungement of the Criminal Juvenile Records of R.G.C. \(Bergen County and Statewide\)](#)—The petitioner appealed from the motion court's denial of her second petition for expungement under the "clean slate" statute. Although the petitioner satisfied the statute's 10-year time requirement, she had not fully satisfied the civil judgment for restitution. She paid only restitution while incarcerated but made no payments following her release. The petitioner asserted her noncompliance was not willful. Rather, she attributed her inability to satisfy the significant remaining restitution to her deportation to Italy in 2017, her subsequent relocation to Canada, dependence on limited public assistance as a non-citizen; and significant medical issues. The petitioner, however, did not present competent evidence to substantiate her claim that noncompliance with the judgment was not willful. On appeal, the Appellate Division weighed whether the petitioner's failure to pay constituted willful compliance under the statute. The Appellate Division affirmed the lower court, holding that the petitioner's failure to pay restitution following her release from prison amounted to willful noncompliance with the judgment. The court concluded that absent competent and credible evidence demonstrating the petitioner's inability to satisfy her restitution obligation, her nonpayment could not be excused.

##### Civil—Personal Injury/Ski Act

[Martin McGuinniss, et al. vs. Ski Campgaw Management LLC, et al. \(Bergen County and Statewide\)](#)—An interlocutory appeal, the Appellate Division held that the Legislature intended the Ski Act to apply to snow tubing activities, and the plaintiff cannot demonstrate that the operator of the snow tubing site had actual or constructive notice of a hazard he alleged caused his injuries. The Appellate Division reversed an order denying the defendant summary judgment.

##### Employment—Labor Relations

[In the Matter of State of New Jersey and Council of New Jersey State College Locals, AFT, et al. \(New Jersey Public Employment Relations Commission\)](#)—New Jersey challenged the final agency decision of the Public Employment Relations Commission (PERC) that 28 employees working in 11 positions at Kean University, Montclair State University and the College of New Jersey can be members of collective bargaining units. The Appellate Division rejected the state's challenge, holding that PERC's ruling was not arbitrary, capricious or unreasonable and was consistent with the record and the applicable law.

##### Estate—Arbitration Provision

[In the Matter of the Estate of Samuel P. Hekemian, Deceased \(Bergen County and Statewide\)](#)—The Appellate Division considered, as a matter of first impression, the validity of an arbitration provision contained in a testamentary instrument. The parties appeared before the Appellate Division to challenge the arbitration provision set forth in the 2002 last will and testament of Samuel P. Hekemian, survived by his wife and four sons. The Appellate Division held that the arbitration provision failed for lack of mutual assent to the arbitral forum between the parties and is contrary to the state's statutory scheme governing the Administration of Estates of Decedents and Others Act, N.J.S.A. 3B:1-1 to :20-1. The Appellate Division affirmed the lower court.

Whether you are a law student just starting out, a mid-career professional looking to reinvigorate your practice, or an experienced practitioner, the NJSBA has something for you. Join a powerful network of 16,000 legal professionals today. [Learn more here.](#)