

THE NJSBA DOCKET



June 26, 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—June 2026

- The state Judiciary implemented a revised process for complaints against [mediators and arbitrators](#) serving in court-annexed complementary dispute resolution programs.
- The Judiciary issued a [directive](#) updating the standards and rules governing New Jersey's Special Civil Part Officers.
- The Judiciary appointed [Jeff J. Horn](#) as secretary of the District IIIA Ethics Committee (Ocean County), effective July 1.
- The New Jersey Division of Law invites [applications](#) from law firms willing to represent the state as outside counsel in employment litigation matters.
- Read the court notices announcing the state Supreme Court's reappointments to the Board of Trustees of the [New Jersey Lawyers Assistance Program](#) and the [Advisory Committee on Judicial Conduct](#).
- The Judiciary's eCourts system now supports [electronic filing](#) in the Special Civil Part—Small Claims docket. Attorneys are encouraged to file all summonses and complaints in eCourts rather than through the Judiciary Electronic Document Submission system or on paper.
- The Judiciary issued amendments to clarify [term limit provisions](#) for board members of the New Jersey Lawyers' Fund for Client Protection and New Jersey Lawyers Assistance Program.



First Annual NJSBA Golf Outing Set for Sept. 1

Join fellow attorneys for a day of golf, networking and camaraderie at the NJSBA's [First Annual Golf Outing](#) on Sept. 1 at Fiddler's Elbow in Bedminster. The event features a four-player scramble open to golfers of all skill levels, along with a BBQ lunch, practice range access, networking opportunities and a post-golf cocktail reception and dinner. Space is limited. Secure your foursome or individual spot today.



Earn Up to 8 CLE Credits at the NJSBA Summer Conference

Register today for the NJSBA's Summer Conference on Aug. 20, [a special one-day virtual event](#) featuring timely programs on some of the most important issues facing attorneys today. Earn up to eight CLE credits while gaining practical insights in areas including personal injury, trusts and estates, criminal law, ethics, trial practice, artificial intelligence and more. Hear from an outstanding faculty of judges, experienced attorneys and industry professionals.



Call for Volunteers Support Veterans with Legal Aid

The NJSBA's Young Lawyers Division invites the legal community to participate in Wills for Warriors on July 11, a [volunteer event](#) where attorneys will provide free estate planning services to veterans and first responders. Training is required for first-time volunteers.



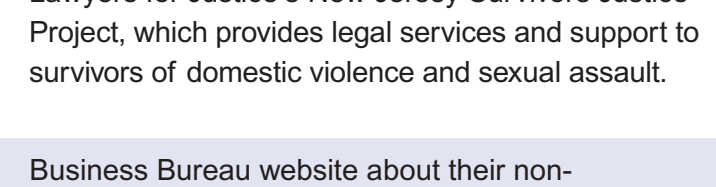
NJSBA 2026 Mid-Year Meeting Heads to Lisbon, Portugal

Join the NJSBA for its [2026 Mid-Year Meeting](#) from Oct. 11–17 in the stunning and historic city of Lisbon, Portugal. The event will be headquartered at the Hotel Tivoli Avenida Liberdade Lisboa, a luxury hotel located along the city's grandest avenue. Attendees will enjoy a unique blend of educational programming, networking opportunities and cultural experiences in one of Europe's most vibrant destinations.



Network and Give Back at YLD Fundraiser—All Members Invited

All NJSBA members are invited to join the Young Lawyers Division for a [networking fundraiser](#) on July 17 at Homestead Bar & Kitchen in Morristown. Connect with colleagues while enjoying food, drinks and a silent auction featuring unique items and experiences. Proceeds will benefit Volunteer Lawyers for Justice's New Jersey Survivors Justice Project, which provides legal services and support to survivors of domestic violence and sexual assault.



Business Bureau website about their non-refundable retainer policy. The judge also awarded Hendrickson attorney's fees and court costs. Lento Law Group solely appealed the dismissal of its defamation claim, arguing the judge: (1) misinterpreted UPEPA by applying the Rule 4:6-2(e) motion to dismiss for failure to state a cause of action upon which relief can be granted standard instead of the Rule 4:46 summary judgment standard; and (2) incorrectly ruled the social media posts were not defamatory. The Appellate Division concluded that the plain language of UPEPA authorizes the motion judge to apply the motion to dismiss standard and does not require application of the summary judgment standard. Moreover, in applying the Act, the judge correctly determined that the social media posts were a matter of public concern and that the Lento Law Group's pleadings failed to establish a prima facie case of defamation because the posts were opinions and, thus, non-actionable, the Appellate Division held.

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Supreme Court, Appellate and Third Circuit Decisions—June 2026

(U.S. Court of Appeals for the Third Circuit)

Employment—Alleged Whistleblower Retaliation

[Jodi Asay v. New Jersey Transit Rail Operations, Inc.](#)—Jodi Asay appealed a summary judgment in favor of her former employer, New Jersey Transit Rail Operations, Inc., who she claimed fired her in retaliation after she blew the whistle on NJT's unsafe practices. The Third Circuit affirmed the lower court, ruling that Asay failed to adduce evidence that anyone who influenced the decision to fire her knew about her protected activity.

Civil—Attorneys' Fees

[Artem V. Gelis v. BMW of North America LLC](#)—Class action counsel serve a valuable role in our legal system and deserve to be paid. But not twice. To ensure counsel are paid only reasonable attorneys' fees, courts often calculate fees using the lodestar method—the product of class counsel's reasonable hours on a case multiplied by their reasonable hourly rates. In certain cases, however, courts may increase the resulting lodestar using a "lodestar multiplier" to account for special circumstances. In which cases is that permissible? The Supreme Court has curtailed the use of lodestar multipliers to calculate reasonable attorneys' fees awarded under federal fee-shifting statutes, see *Perdue v. Kenny A.* ex rel. Winn, 559 U.S. 542 (2010), but it has not addressed the use of multipliers when fees are awarded under contractual fee-shifting provisions. In this case, the appellant BMW appealed the District Court's use of a lodestar multiplier in awarding fees pursuant to a settlement agreement. The Third Circuit vacated the District Court's fee award and remanded for further proceedings, concluding that the Supreme Court's constraints on the use of lodestar multipliers in statutory fee-shifting cases also apply in contractual fee-shifting cases.

(New Jersey Supreme Court)

Health—Charitable Immunity Act

[Cassandra Gigi Smith v. Newark Community Health Centers, Inc. \(Essex County and Statewide\)](#)—The state Supreme Court considered whether Newark Community Health Centers, Inc.—a federally qualified health center founded to "provide affordable, quality healthcare" to underserved populations—is entitled to immunity under New Jersey's Charitable Immunity Act as an entity "organized exclusively for religious, charitable or educational purposes," N.J.S.A. 2A:53A-7(a), or is instead entitled only to a \$250,000 cap on damages as an entity "organized exclusively for hospital purposes," id. at -8. The Court held that, as a provider of medical and dental services, NCHC is organized exclusively for hospital purposes under N.J.S.A. 2A:53A-7(b) and -8 and is therefore entitled only to the cap on damages under N.J.S.A. 2A:53A-8.

Government—OPRA

[A-72-24 Alex Rosetti v. Ramapo-Indian Hills Regional High School Board of Education \(Bergen County and Statewide\)](#)—The state Supreme Court considered whether logs of personal, private email accounts containing government-related emails are government records pursuant to the Open Public Records Act. In January 2023, respondent Alex Rosetti made an OPRA request to the Ramapo-Indian Hills Regional High School Board of Education and its records custodian, Thomas Lambe, seeking certain records, including "email logs of all past and current Board members for all email accounts in which they have conducted or discussed Board of Education matters." The Board produced a redacted log derived from Board-issued government email accounts, but it did not produce email logs from Board members' personal email accounts which they used to conduct Board business. Rosetti reaffirmed his position that the Board is required to produce the requested email logs. In December 2023, the trial court denied Rosetti's request. The Appellate Division reversed and held that email logs from Board members' personal email accounts discussing Board business are subject to OPRA disclosure. On appeal, the Court held that logs of government-related emails contained in personal email accounts are government records under OPRA.

(New Jersey Appellate Division)

Civil—Defamation

[Lento Law Group PC vs. Carly Hendrickson \(Mercer County and Statewide\)](#)—The Appellate Division interpreted the Uniform Public Expression Protection Act (UPEPA), which allows persons sued for defamation to seek prompt dismissal of meritless lawsuits intended to chill their constitutionally protected free speech. Applying UPEPA, the motion judge dismissed the plaintiff Lento Law Group, P.C.'s lawsuit against its former client, the defendant Carly Hendrickson, alleging defamation and tortious interference with prospective economic advantage. Hendrickson posted unfavorable comments on the Better

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.](#)