A PUBLICATION BY THE NEW JERSEY DEFENSE ASSOCIATION / SPRING 2024

NEW JERSEY DEFENSE

PRESIDENT'S LETTER

Greetings fellow members of the New Jersey Defense Association and esteemed members of the Judiciary, and a belated 'Welcome to 2024' to all!

We are now over 8 months into this year's term, and I would like to pause for a moment and thank those of you who have been instrumental in making my tenure as President of the NJDA a success thus far. To our Board members and committee chairs, thank you for your tireless work attending meetings, organizing seminars, and advancing the interests of the defense bar. To members of the Judiciary, thank you for imparting your wisdom and insight through participation in our educational events, despite the ongoing judicial crisis. To our sponsors, thank you for providing your expertise to our members and for backing our events. To our Executive Director Maryanne Steedle, thank you for… well… EVERYTHING! And to our over 650 members, thank you for your continued support of our initiatives and for enriching our organization with your participation.

I dare say that we are beginning to turn the corner on the judicial crisis that has gripped our court system over the past several years. We wholeheartedly applaud the steadfastness of our State's judges in keeping the ship righted during this tumultuous time when judicial vacancies have been, not the outlier, but the norm. In short, the efforts put forth by those on the bench have been nothing less than heroic. As the number of judicial vacancies begins to diminish, we look forward to working with the bench to advance our cases towards trial and to reduce the backlog on the court's dockets.

Looking forward to the Spring and beyond: the NJDA has been granted amicus status in several matters pertinent to the defense bar. We are excited to participate on behalf of our members and hope to reproduce the successful results we have had over the past year. I hope to be able to report on our prevailing outcomes in the upcoming months. The NJDA Annual Convention 2024 is also on the horizon. Event and hotel registration are now open for the Annual Convention, which will be held at The Equinox in Manchester, Vermont from June 27 – 30, 2024. Please visit our website, www.njdefenseassoc.com, for further details and registration information. I hope to see you all there!

As we hit the home stretch of this year's NJDA term, I would once again like to reiterate my many thanks for all your dedication and support of this great organization. It has been an absolute pleasure serving this organization. I look forward to continuing our efforts through the conclusion of the term (and beyond!).

C. ROBERT LUTHMAN, ESQ.

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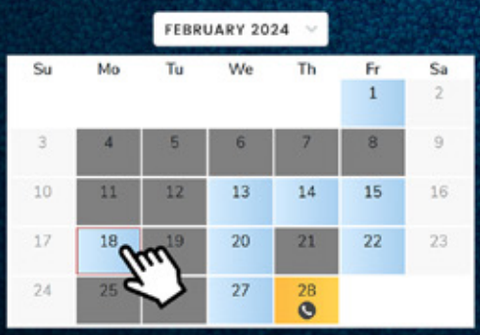

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FOLLOWING THE RULES: A SPOTLIGHT ON R. 4:25-8, THE MOTION IN LIMINE RULE

BY JANETT PATEIRO SMYTH, ESQ.

A motion in limine is a pretrial tool that can effectively topple your adversary's strategy by barring (or allowing) the admission of certain evidence at trial and, thereby, make the prospect of a settlement more appealing. The purpose of an in limine motion is to promote efficiency and fairness. More specifically, in limine motions seek rulings on evidence or arguments that have the potential to be prejudicial, irrelevant, or otherwise inadmissible, and which can unduly influence the jury or hinder the administration of a just trial. In limine motions do not follow the regular motion calendar and are, instead, argued before the judge (and outside the presence of the jury) at the commencement of trial. Thus, it is no accident that in limine is the Latin term for "at the threshold."

The need for New Jersey courts to codify best practices as to motions in limine became evident after the decision in Cho v. Trinitas Regional Medical Center, 443 N.J. Super. 461 (App. Div. 2015), certif. denied, 224 N.J. 529 (2016). There, the appellate court held that litigants may not file a dispositive motion, styled as a motion in limine, on the eve of trial because doing so would violate the opposing party's right to the due process of law. Id. at 464. The appellate court noted that, at the time of its ruling, there was no Court Rule explicitly addressing motions in limine, leading to "the timing of the motion, rather than its subject matter, to pass for a definition." See id. at 470. To correct this "missing" Rule, Court Rule 4:25-8, governing motions in limine, went into effect on September 1, 2020.

Rule 4:25-8 defines a motion in limine as "an application returnable at trial for a ruling regarding the conduct of the trial, including admissibility of evidence, which motion, if granted, *would not have a dispositive impact on a litigant's case*." R. 4:25-8(a)(1) (emphasis added). The Rule's specific wording reinforces the importance of timely filing dispositive motions in accordance with R. 4:46, which governs motions for summary judgment, and not at the time of trial. The Comment to the Rule makes clear that a dispositive impact on a "litigant's" case can refer both to a plaintiff, such as a motion ruling that would effectively result in the dismissal of a complaint, or to a defendant, such as a motion that would suppress a defendant's defense and, thus, end the case.

As an example of a prohibited motion filed in limine, the Rule specifically lists a motion to bar expert testimony when such testimony is "*required as a matter of law to sustain a party's burden of proof.*" See R. 4:25-8(a)(1) (emphasis added). Importantly, not all motions to bar expert testimony are prohibited as in limine filings. For example, in a case alleging negligence and citing multiple injuries as evidence thereof, a motion to bar the entry of certain evidence where a party lacks the requisite expert testimony to prove a specific injury is permissible as long as the non-moving party would still have a viable negligence claim beyond the certain evidence sought barred. See also, Conforti v. County of Ocean, 255 N.J. 142, 170 (2023) (finding that a motion to exclude evidence of immunized conduct would not have been dispositive because plaintiff's negligence count was supported by evidence not subject to the immunity statute at issue).

The Rule further provides that motions in limine, with supporting briefs, are to be attached as exhibits to the parties' pretrial information exchange required under R. 4:25-7(b). See R. 4:25-8(a)(2). Thus, as submissions included in the parties' pretrial information exchange, motions in limine incur no filing fees. See R. 4:25-8(a)(1), (2).

The Rule also sets forth specific briefing requirements and page limitations, limiting the respective moving and opposing briefs to 5 pages, exclusive of tables of contents or authorities. See R. 4:25-8(a)(3). Additional highlights for practitioners to note are that:

- Each in limine motion is to embrace only one issue to the extent practicable, (R. 4:25-8(a)(3));
- No reply briefs are permitted unless requested by the Court, (R. 4:25-8(a)(3));
- If the trial court does not rule on a motion prior to opening statements, the court shall instruct the parties as to whether and to what extent they may refer to the disputed evidence, until such motion is decided, (R. 4:25-8(a)(4));
- Motions that do not comply with the Rule's mandates *need not be decided unless good cause is shown for the non-compliance*, (R. 4:25-8(b));
- A party failing to submit a motion in limine is *not* precluded from seeking to admit evidence or object to the admission of evidence during trial, (R. 4:25-8(c)); and
- The trial judge can reconsider or modify any in limine ruling either sua sponte or at the request of a party, given later developments during the trial, (R. 4:25-8(d)).

As a practical matter, if you have any basis to argue that certain evidence should be inadmissible, it is better strategy to file a motion in limine seeking to bar the entry of that evidence than it is to wait and object to its entry after the jury has already heard it. In other words – and to sum up every trial attorney's nightmare – once the jury hears evidence that is subsequently deemed inadmissible, it can be challenging if not impossible to unring the bell.

Janett Pateiro Smyth is Of Counsel at Hoagland, Longo, Moran, Dunst & Doukas, LLP. As a member of the firm's Civil Litigation and Commercial Litigation practice group, Janett focuses her practice on complex commercial litigation, general and product liability, and the defense of negligence and personal injury claims. Janett is a member of the District VIII Ethics Committee, a Trustee of the Middlesex County Bar Foundation, and a Board member of the Hispanic Bar Association of New Jersey. Janett speaks Spanish fluently.

PRE-SURGICAL DMES AND SPOLIATION OF EVIDENCE

BY ANGEL M. HIERREZUELO, ESQ., METHFESSEL & WERBEL P.C.

In cases where aggravation of a prior injury is alleged, it is often prudent to serve a preservation of evidence notice to the plaintiff where it is anticipated that the plaintiff will obtain a subsequent surgery. The notice practically accomplishes two mutually exclusive events that depend upon the plaintiff's action: should the plaintiff choose to disregard the notice and obtain the surgery, the defense litigator can claim a possible spoliation of evidence, on the other hand, where the plaintiff abides by the notice, defense counsel will obtain a vital defense medical examination ("DME") not tainted by a subsequent surgery.

The first instance where the issue of spoliation of evidence was addressed in the context of pre-surgical DMEs was in an unreported decision in the Eastern District of Louisiana, in Menges v. Cliffs Drilling Co., CIV. A. 99-2159, 2000 WL 765082 (E.D. La. June 12, 2000). In Menges, the plaintiff underwent surgery before he could be examined by defense-designated doctors at DMEs. The federal district court judge rejected all spoliation sanctions, stating that no case has been cited to the court equating breach of a duty to attend an DME as a spoliation of evidence. Id. at *3. The court noted that plaintiff had given to defendant "full access to his medical records, again before surgery, and defendant therefore had ample opportunity to investigate plaintiff's condition and to require an DME before plaintiff underwent surgery." Ibid.

Contrarily, and subsequent to Menges, the issue was addressed in New York State in Mangione v. Jacobs, 950 N.Y.S.2d 457, 460 (Sup. Ct. 2012). In Mangione, Plaintiff Susanna Mangione injured her back and shoulder after an accident while a passenger in a taxi. Id. at 460. Just a year prior, Mangione was involved in another accident where she injured her back and shoulder due to a fall she sustained while a passenger on a bus. Id. at 461. During litigation involving her injury in the taxi, defense counsel sought to have plaintiff attend a DME prior to plaintiff's spinal surgery. Id. at 462. Plaintiff, however, disregarded the notices and obtained the surgery. Id. at 463. Defense counsel therefore contended that plaintiff spoliated evidence as she deprived defendant from examining her condition following her second injury, but before she underwent the spinal surgery. Ibid. Ultimately, the appellate court found that "the court-ordered IMEs were of crucial importance for a jury to determine whether the plaintiff's present injuries were causally connected to the accident in the taxi in 2009, as opposed to that of her fall in the bus in 2008." Id. at 469. The court therefore dismissed the plaintiff's complaint on the grounds of spoliation of evidence. Id. at 474.

Importantly, it should be noted that the varying results in Menges and Mangione cases were likely due to defense counsel's actions in the respective cases. In Menges, the Court noted that the denial of spoliation sanctions was directly due to defense counsel's failure to have the plaintiff undergo a DME despite the opportunity existing to do so. See Menges, 2000 WL 765082 at *3. However, in Mangione, the Court noted that dismissal of plaintiff's complaint was proper because the plaintiff had failed to appear for multiple DMEs that were scheduled by defendant to be completed before plaintiff's back surgery. See Mangione, 950 N.Y.S.2d at 469. Notably, in 2021, an appellate court in New York abrogated Mangione, finding that the condition of one's body was not the type of evidence that can be subject to a spoliation analysis. Gilliam v. Uni Holdings, 159 N.Y.S.3d 401, 403 (App. Div. 2021).

New Jersey case law unfortunately does not directly address the issues raised in Menges, Mangione, or Gilliam. Nevertheless, though no longer precedential in New York, Mangione demonstrates the importance of proactively seeking a DME before a plaintiff undergoes surgery to a body part that was previously injured. Often, a subsequent surgery can irreparably alter the condition of the body part to an extent that complicates the analysis of whether the plaintiff's injuries were aggravated by the subsequent injury. Accordingly, it is imperative to use methods such as preservation letters and, in the event they go ignored, motions to compel a DME to ensure that a plaintiff is made to preserve their body for proper examination.

OVERVIEW OF POTENTIAL CLAIMS AGAINST CANNABIS BUSINESSES

BY ELIZABETH DALBERTH, ESQ., SWEENEY & SHEEHAN P.C.

As more cannabis dispensaries open in New Jersey, defense counsel should be aware of the types of claims that can be brought against cannabis businesses. To be sure, the plaintiff's bar will be evaluating what types of claims can be brought against growers, labs and dispensaries. This article will address several types of claims that are available under certain factual circumstances.

One area of litigation involves consumer fraud. The case of Centeno and Wilson v Dreamfield Brands, Inc. and Med for America, Inc., No. 22STCZ33980 (Cal. Super. Ct. Oct. 20, 2022), illustrates how consumers are using claims of consumer fraud to sue manufacturers and sellers of cannabis. In that case, the plaintiffs allege that the defendants committed fraud with regard to the manufacture, sale and marketing of pre-roll cannabis products. The complaint alleges that the advertising for the pre-rolls emphasized the potency of the strain, declaring, "This is the one joint that will get you to Mars quicker than Elon Musk." The pre-rolls listed THC content at 46%; however, the plaintiffs' testing of the product revealed a much lower THC content of 23% to 27%. If true, this means that the THC content was inflated by 70% to 100%. The suit is based on the premise that most consumers prefer and seek out cannabis with a higher THC content, and, because of this demand, the sellers can set a higher price for products with a higher THC content. Plaintiffs also allege that sellers "lab shop" and use whichever lab provides them with the highest potency rating. The plaintiffs claim that they were injured because they would not have purchased the product if they had known that the THC content listed on the product was inflated, and they also allege that they overpaid for the product due to the defendants' misleading labeling. This case is also illustrative of the conflict of interest caused by a grower's ability to choose labs for testing, which conceivably could motivate a lab to issue testing results favorable to that grower.

Another topical area of concern dealing with lab testing is that, as marijuana still remains a Schedule I controlled substance, there are no federal regulations with regard to testing cannabis. Recently, there has been a focus on cannabis being contaminated with pesticides, arsenic, fungus, lead and mold. See, e.g., Stephanie Armour, For Marijuana Users, Even Legalization Doesn't Guarantee Safety, Wall Street Journal, Feb. 20, 2024. These contaminants have been shown to cause fungal infections, numbness, movement disorders, seizures, muscle weakness and rapid heartbeat. People who are immuno-compromised are more susceptible to risk due to their weakened ability to fight off infections. State regulators have closed down labs and dispensaries for faulty testing and for contaminated products. In New Jersey, Curaleaf has been investigated for selling products that were not tested in a lab as required by state regulations. It was also subject to product recalls due to possible fungal contamination, which can cause allergic reactions or infections. Although causation may be the biggest issue of proof for a plaintiff who is alleging injury caused by consumption of tainted cannabis, it should be expected that lawsuits will result from ingestion of contaminated cannabis.

Another area of possible litigation involves mislabeling of products. Curaleaf settled a class action suit in Oregon after it sold CBD drops that actually contained THC. Williamson v. Curaleaf, Inc., 3:22-cv-00782 (D. Ore. May 30, 2022). THC is the psychoactive substance that produces intoxicating effects, and is stronger than CBD, which is not psychoactive and is mostly used for medicinal purposes. In Oregon, products containing THC are not permitted to be sold to consumers without a warning label disclosing the presence and amount of THC. The case alleges that the plaintiffs were harmed by the unintentional consumption of THC, and would not have purchased the product if it had been labeled properly. Another class action lawsuit was filed in California, alleging that the manufacturers overcharged customers by illegally selling products with a substantially lower THC content than what was set forth on the label. Gallard v. Ironworks Collective Inc. and Stiiizy LLC, 22ST-cv-38021 (Cal. Super. Ct. Dec. 6, 2022). Like the Centeno case above, this suit claims violations of consumer protection laws and false advertising, and that the defendants charged more for a product with a higher THC content. It claims that customers were deceived by relying on the inaccurate labels. Another labeling issue relates to a manufacturer's use of labels that look like popular children's candy, drinks and snacks. For example, there are cannabis products with packaging that look like Doritos or Jolly Ranchers, which are attractive to children. This has caused the

FDA and the FTC to issue warning letters to manufacturers of products that use packaging imitating foods and beverages favored by children. These letters could be used as evidence against the manufacturers in lawsuits alleging harm caused by accidental ingestion.

Products liability actions could also be brought on the basis of failure to warn, and design and manufacturing defects. These cases could allege that a manufacturer failed to properly warn consumers about risks, side effects or correct usage of a product. Manufacturing and design defect claims could be based on improper levels of contaminants in the growing process, as well as on products containing dangerous levels of THC. Cases involving products liability, as well as the other claims discussed herein, will inevitably rely on expert testimony to opine as to causation, and expert challenges by the defense as to methodology and valid science is one area where the cannabis industry can protect itself from future claims.

Negligence claims could be brought against dispensaries if budtenders fail to properly and effectively discuss usage of cannabis, especially with first-time users. For example, an incident in Denver, Colorado, involved a first-time user who ingested 6 times the suggested amount of an edible cookie, who jumped out of a window and died. The dispensary clerk advised the user and his 5 friends to split an edible cookie six ways, but when the user did not feel immediate effects he ate the entire cookie himself, seemingly unaware of its potency. Thus, cannabis businesses should ensure that labels properly disclose the risks associated with use of the product, and even the proper way to ingest it. Dispensaries should also ensure that budtenders are properly vetted and trained.

There have also been wrongful death claims associated with the ingestion of cannabis as well. One case was brought by the sons of a man who suffered a psychotic break after ingesting an edible and killed his wife. Andrew Kirk v. Nutritional Elements and Gaia's Garden, 2016-cv-31310 (D. Colo. April 13, 2016). Although the case resolved, the plaintiffs' counsel had emergency room records and experts on hand to show that the ingestion of the cannabis led to the murder. Another wrongful death case was brought against Curaleaf, Inc. in federal court in Oregon by the estate of a 76 year old man who ingested CBD drops that actually contained THC. Yoakum v. Curaleaf, Inc., No. 3:22-cv-00001 (D. Ore. Jan. 1, 2022). His use of the product allegedly caused a marked decline in his communication and mobility, and caused stroke-like symptoms, requiring hospitalization on two occasions, and it is claimed that it caused a weakened immune system to the point where he was unable to fight off Covid. Again, there are causation issues but Curaleaf admitted that an employee confused two containers during the filling and packaging process, one containing CBD and one containing THC, and Curaleaf was fined and issued a suspension, which could be used as evidence at trial.

In sum, cannabis businesses should ensure that they are using labs that utilize proper testing methods. They should ensure they are not overrepresenting or underrepresenting the amount of THC in the product. Proper labeling of products is extremely important, and businesses should also ensure that they are compliant with state regulations. Adhering to these policies will reduce future risk to the company and will assist in the avoidance of litigation.

UNLOCKING THE SCHEMES ASSOCIATED WITH FRAUDULENT PERSONAL ARTICLES CLAIMS

BY MICHAEL GERSTEIN, ESQ.

At first glance, national news concerning the interception of counterfeit jewelry published by the U.S. Customs and Border Protection (CBP) may seem unrelated to insurance defense issues in the state of New Jersey. However, upon closer examination, the work of CBP officers is the first line of defense in helping to halt fraudulent jewelry claims. By stopping the influx of imitation jewelry, consumers are better protected from being taken advantage of by unscrupulous sellers and insurance carriers are better protected against illegitimate claims.
But what of the pieces that make their way through?

How are we to combat deceitful jewelry claims involving personal articles policies?

Many consumers and attorneys alike may not be intimately familiar with personal articles policies, let alone the fraud they invite. A personal articles policy provides an insured with extra coverage for more valuable items. Such policies often insure items that are easily lost, misplaced or have a higher likelihood of being stolen e.g., jewelry. These policies differ from homeowners policies which may specifically exclude from coverage high-end personal property unless there is a purchase of supplemental coverage. Personal articles policies generally insure a particular item for merely a fraction of its value – the premium is typically just 1% of the value of the jewelry piece. For those of you already thinking about the math, for only $1,000.00, prorated throughout a year, a person can insure a watch, chain, pendent, etc., worth $100,000.00.

You may already be noting the potential advantages with this type of arrangement if you place yourself in the mind of a fraudster: Secure a policy on a counterfeit item purchased for pennies on the dollar, obtain a fraudulent appraisal, pay a month or two of the premium, and then claim that the item is lost or stolen. When the claim materializes on the desk of a busy insurance adjuster, the facts of loss are often difficult to verify. After all, how does one prove that an insured's watch *didn't* fall off his wrist into the ocean while he was jet-skiing? How does one prove that an insured *wasn't* robbed of his chain at gunpoint in a dark alley?

Evaluating coverage for these types of claims requires not only scrutiny of the underlying claim, but also scrutiny of the ownership and legitimacy of the jewelry at issue.

What is required to insure a piece of jewelry under a personal articles policy? Carriers will almost certainly have two requirements to insure a piece of jewelry under a personal articles policy – proof indicia of ownership and proof indicia of value. Generally, both may be established by the insured's presentation of a receipt and appraisal. Often, it is only the appraisal itself that the prospective insured has on hand. What if the agent, because of underwriting guidelines, requires that the insured bring the jewelry into his or her office as part of the transaction, in order to obtain extra verification? Are insurance agents really going to be able to distinguish knock-offs from the real McCoy? Worse, what if an insured merely borrowed *real* jewelry from a friend or relative and simply fabricated the appraisal for purposes of securing the insurance policy? How is an insurance agent able to make such a determination in the moment?

As a starting point for addressing these claims, the underlying acquisition details associated with the jewelry have to be addressed to rule out whether there was any fraud in the inducement of the policy. Can the insured provide clear details relative to how he/she acquired the jewelry? Can the insured establish that he/she had not only the means to purchase a particular piece but, that the purchase was actually made? Are there corroborative witnesses, bank statements, and other documents and evidence that establish the acquisition of the jewelry. Especially in cases where there is no receipt from a reputable jeweler, or where the item in question was allegedly a gift from a witness not unable to be located, the specter of the piece being counterfeit and/or nonexistent is raised.

Even if the purchase details are reasonably established by the insured, the appraisal must still be scrutinized. Jewelry appraisals can feature extreme and nonsensical disparities between the true value of a piece and its purchase-price. There are currently no U.S. laws or regulations that set educational standards or require certifications to become a jewelry appraiser. While there are industry standards for appraising (i.e., from the National Association of Jewelry Appraisers), the legitimacy of the appraisal will ultimately be a fact-based determination.

The appraisal should have the appraiser's contact information in terms of a phone number and address. It should be signed by the appraiser. It should, for example, not misspell the words "jewelry" or "appraisal" (yes, actually, this has happened). Further, the appraisal generally should not contain questionable photocopy marks and/or a photograph of the piece that is fuzzy or useless. Moreover, the valuation on the appraisal should also bear some semblance to the market value of the underlying precious metals, gems, or diamonds within the appraised jewelry piece. For rings, there should be mention of the type of metal the stone is set in. Moreover, the stones referenced on the appraisal, if any, should be described relative to the classic four "Cs" - cut, color, clarity and carat weight. For watch brands such as Rolex and Cartier, which ascribe individual and unique serial numbers for each item those brands produce, the serial number should be accounted for within the appraisal.

Appraisals that lack such fundamental information should raise several red flags as to the legitimacy of the jewelry, and ultimately, the claim itself. If the appraisal does not communicate how the appraiser arrived at a particular valuation and/or confirmed the authenticity of the piece, it is suspicious on its face. And we must also be mindful that the insured may have inadvertently purchased or received a counterfeit jewelry piece and/or inaccurate appraisal through no fault of their own.

Once the acquisition and appraisal details are confirmed to be legitimate, there must still be a thorough investigation into the underlying claim. Typically, there are two tools at our disposal to investigate claims made under personal articles policies – the examination under oath and document requests. Both are almost certainly contemplated in this type of policy. The underlying nature of the loss will inform the investigating attorney of what portions of the insured's narrative need to be confirmed through his or her testimony in order to verify the loss. For example, if the claim is that a piece of jewelry was stolen from a robbery, central questions will relate to how and when the insured reported the robbery to police and others and whether other items were stolen, and thereafter replaced after the loss, such as credit cards or an ID. Document requests may even cover the insured's bank transactions and/or cell phone step data on the day of the robbery to confirm the insured's timeline. Ultimately, if the facts dictate denial of the claim, it will most likely be through establishing that the insured has violated the personal article policy's concealment or fraud clause and/or has intentionally caused the loss. See Longobardi v. Chubb Ins. Co., 121 N.J. 530, 539 (1990) ("When an insurer clearly warns in a 'concealment or fraud' clause that it does not provide coverage if the insured makes a material misrepresentation about any material fact or circumstance relating to the insurance, the warning should apply not only to the insured's misrepresentations made when applying for insurance, but also to those made when the insurer is investigating a loss.")

Counterfeit jewelry will continue to make its way into New Jersey insurance claims and questionable jewelry claims will continue to plague New Jersey carriers who sell personal articles policies, as the fraud potential has low risk and high rewards. However, through the application of thorough examinations under oaths and diligent document requests, non-meritorious claims can successfully be resisted.

Michael Gerstein is a member of Bennett, Bricklin & Saltzburg, LLC. Michael has spoken on various insurance issues including ride-sharing, fraud and auto crime investigations. He is a member of NJDA's Insurance Law Committee.

SAVE THE DATE

NOVEMBER 11, 2024

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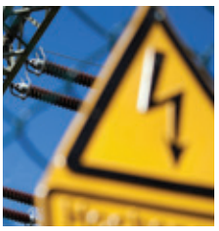




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OCTOBER 14, 2024

ANNUAL TRIAL COLLEGE
8:30 a.m. – 12:30 p.m.
Union County Court House
Elizabeth, NJ

NOVEMBER 11, 2024

15TH ANNUAL WOMEN & THE LAW SEMINAR
8:45 a.m. – 1:00 p.m.
APA Hotel Woodbridge
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NOVEMBER 26, 2024

NJDA/ICNJ ANNUAL AUTO LIABILITY SEMINAR
8:30 a.m. – 1:00 p.m.
APA Hotel Woodbridge
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