Posted Date	Name of Case (Docket Number)	Type
Aug. 15, 2023	STATE V. OSCAR R. JURACAN-JURACAN (A-32-22 ; 087849) In a criminal jury trial, there is a presumption that foreign language interpretation services will be provided in person, which is consistent with the New Jersey Judiciary's longstanding practice. The Court sets forth guidelines and factors to assist trial courts in deciding whether VRI should be used during criminal jury trials, and it remands the matter for the trial court to reconsider whether VRI is appropriate in the current case after assessing those factors.	Supreme
Aug. 14, 2023	VICTORIA CRISITELLO V. ST. THERESA SCHOOL (A-63-20 ; 085213) The "religious tenets" exception of N.J.S.A. 10:5-12(a) -- "it shall not be an unlawful employment practice" for a religious entity to follow the tenets of its faith "in establishing and utilizing criteria for employment" -- is an affirmative defense available to a religious entity when confronted with a claim of employment discrimination. Here, it is uncontroverted that St. Theresa's followed the religious tenets of the Catholic Church in terminating Crisitello. St. Theresa's was therefore entitled to summary judgment and the dismissal of the complaint with prejudice.	Supreme
Aug. 10, 2023	CAROL ANN CONFORTI V. COUNTY OF OCEAN (A-1-22 ; 086206) The definition of "medical facility" under N.J.S.A. 59:6-1 does not restrict the substantive immunities granted in N.J.S.A. 59:6-4, -5, or -6, which are also not "superseded in the jail suicide context." However, there was evidence presented in this case, both at the summary judgment stage and at trial, that falls outside of any immunities granted by N.J.S.A. 59:6-4, -5, and -6. The jury could reasonably have concluded from that evidence that the County defendants were negligent. The trial court was therefore correct to refuse to dismiss plaintiff's negligence count at the summary judgment stage and to refuse to overturn the jury's verdict after trial. The Court accordingly affirms the judgment of the Appellate Division, as modified.	Supreme
Aug. 9, 2023	STATE V. STEPHEN A. ZADROGA (A-22-22 ; 087156) The trial court did not abuse its discretion in finding manifest necessity justified a mistrial here. As the Appellate Division held, the State can present the counts of aggravated manslaughter and death by auto to a new grand jury based solely on the reckless driving evidence, without any evidence on intoxication.	Supreme
Aug. 8, 2023	SUZANNE CARDALI V. MICHAEL CARDALI (A-25-22 ; 087340) A movant need not present evidence on all of the cohabitation factors set forth in Konzelman v. Konzelman, 158 N.J. 185, 202 (1999) -- or in N.J.S.A. 2A:34-23(n), for cases in which the PSA was executed after the statute's enactment -- to make a prima facie showing. If the movant's certification addresses some of the relevant factors and is supported by competent evidence, and if that evidence would warrant a finding of cohabitation if unrebutted, the trial court should find that the movant has presented prima facie evidence of cohabitation and should grant limited discovery tailored to the issues contested in the motion, subject to any protective order necessary to safeguard confidential information. Here, defendant presented prima facie evidence as to several of the Konzelman cohabitation factors, and that evidence, if unrebutted, would warrant a finding of cohabitation. Defendant was therefore entitled to limited discovery.	Supreme
Aug. 7, 2023	STATE V. JASON M. O'DONNELL (A-17-22 ; 087023) The bribery statute applies to any "person" who accepts an improper benefit -- incumbents, candidates who win, and candidates who lose. N.J.S.A. 2C:27-2. The statute also expressly states that it is no defense to a prosecution if a person "was not qualified to act." Ibid. So even if a candidate is unable to follow through on a corrupt promise, the language of the bribery statute makes it a crime to accept cash payments for a promise of future performance. The bribery statute's history, relevant caselaw, and commentary from the Model Penal Code, on which the statute is modeled, confirm that the law extends to candidates.	Supreme
Aug. 3, 2023	LEANDER WILLIAMS V. NEW JERSEY STATE PAROLE BOARD (A-26-22 ; 087613) The Parole Board cannot mandate participation in an RTP for inmates administratively paroled under the EYWO Act. Although N.J.S.A. 30:4-123.59 generally authorizes the Parole Board to impose parole conditions on adult inmates who have been administratively released under the EYWO Act, an RTP is not among the conditions that can be imposed in that setting.	Supreme
Aug. 2, 2023	STATE V. DANTE C. ALLEN (A-55-21 ; 086699) The Court disagrees with the Appellate Division's conclusion that the trial court should have excluded all the detective's narration of the surveillance video. The trial court properly permitted the detective to testify about the manner in which he used the surveillance video to guide his investigation. Applying principles stated today in State v.	Supreme

	Watson, _ N.J. _ (2023) (slip op. at 46-60), the detective's testimony opining that the video showed defendant turning and firing his weapon should have been excluded from evidence. However, that error was harmless given the strength of the State's evidence.	
Aug. 2, 2023	STATE V. ROBERSON BURNEY (A-14-22 ; 086966) The trial court erred in admitting both the testimony placing defendant's phone at or near the crime scene and the first-time in-court identification. Those errors, in combination, deprived defendant of a fair trial.	Supreme
Aug. 2, 2023	STATE V. QUINTIN D. WATSON (A-23-22 ; 087251) (1) Based on the identification evidence alone, defendant's conviction cannot stand. The inherently suggestive nature of first-time in-court identifications, conducted in front of a jury, risks depriving defendants of their due process rights. The Court holds that first-time in-court identifications may only be conducted when there is good reason for them and sets forth certain practices that must be observed in connection with in-court identifications. (2) The narration evidence in this case also ran afoul of the evidence rules, which do not allow for continuous, running commentary on video evidence by someone who has merely studied a recording. The Court identifies certain safeguards to underscore the limited use of narration evidence and adds that a party intending to present narration evidence should provide opposing counsel with a written summary of the proposed testimony before trial. (3) Confrontation Clause challenges are fact-specific. The testimony here about consultation with other law enforcement agencies violated defendant's right to confrontation, and the Court provides guidance for remand.	Supreme
July 25, 2023	ELIZABETH HRYMOC V. ETHICON, INC. (A-20/21/22/23-21 ; 085547) 510(k) evidence is generally inadmissible because the 510(k) clearance process solely determines substantial equivalency, and not safety and efficacy. However, in a products liability claim premised not only on principles of negligence, but particularly on the reasonableness of a manufacturer's conduct in not performing clinical trials or studies, evidence of 510(k) clearance has significant probative value under N.J.R.E. 401 that is not substantially outweighed by the risk of prejudice and potential juror confusion under N.J.R.E. 403. Therefore, under the specific facts and circumstances of this case, the Court affirms the judgment of the Appellate Division. However, the Court parts ways with the Appellate Division's decision as to its suggestion that the scope and admissibility of 510(k) evidence should be determined in a Rule 104 hearing. Instead, the scope and admissibility of 510(k) evidence should be resolved at the hearing on a motion in limine, which is how the issue was and, presumably, will be raised. Section 5 of the PLA does not bar plaintiffs' recovery of punitive damages, and because evidence of 510(k) clearance should have been admitted in the first stage of trial as relevant to the reasonableness of Bard's conduct in not performing clinical trials or studies, it would also be admissible in the second, punitive damages stage.	Supreme
July 3, 2023	STATE V. RAMI A. AMER (A-9-22 ; 086950) The trial court did not violate defendant's speedy trial rights under the IAD, and it properly denied defendant's motion to dismiss his indictment. The Court does not agree with the Appellate Division that defense counsel waived defendant's rights under the IAD. But the Court affirms the Appellate Division's other determinations -- that the IAD's 180-day time period was tolled during the pendency of defendant's pretrial motions and that defendant was "brought to trial" when jury selection began prior to the deadline.	Supreme
June 29, 2023	FACEBOOK, INC. V. STATE OF NEW JERSEY (A-61-21/A-7-22 ; 087054) Based on the language and structure of the relevant statutes, the State's request for information from users' accounts invokes heightened privacy protections. The nearly contemporaneous acquisition of electronic communications here is the functional equivalent of wiretap surveillance and is therefore entitled to greater constitutional protection. New Jersey's wiretap act applies in this case to safeguard individual privacy rights under the relevant statutes and the State Constitution.	Supreme
June 22, 2023	STATE V. CORNELIUS C. COHEN (A-50-21 ; 084493) Expanding the search to the engine compartment and trunk went beyond the scope of the automobile exception. Although the trooper smelled marijuana in the passenger compartment of the car, his initial search yielded no results and provided no justification "to extend the zone of the . . . search further than the persons of the occupants or the interior of the car." State v. Patino, 83 N.J. 1, 14-15 (1980). As a result, the seized evidence should be suppressed.	Supreme
June 21, 2023	STATE V. ANDREAS M. ERAZO (A-16-22 ; 086991) Defendant voluntarily went to the police station to give a witness statement. At the police station, defendant was interviewed twice. During his first interview, defendant was not in custody and thus not yet owed Miranda warnings. The factors set forth in O'Neill therefore do not need to be considered to assess the admissibility of the second interview. And before police interviewed defendant the second time, they properly administered Miranda warnings. With his rights in mind, defendant executed a knowing, intelligent, and voluntary waiver. During his second interview,	Supreme

	defendant confessed. Neither the Fifth Amendment nor state common law calls for suppression of defendant's statements.	
June 20, 2023	GANNETT SATELLITE INFORMATION NETWORK, LLC V. TOWNSHIP OF NEPTUNE (A-63-21 ; 085719) The Court affirms as modified the Appellate Division's judgment. The Court declines to adopt an exception to the American Rule for common law right of access claims to public records. Those claims impose significant burdens on municipal clerks and other records custodians; they require a careful balancing of competing interests and the application of an array of factors that can challenge even a seasoned judge. Imposing fee-shifting in this category of cases would venture far beyond the narrow exceptions to the American Rule that New Jersey courts have adopted to date. Accordingly, Gannett is not entitled to an award of attorneys' fees in this appeal.	Supreme
June 15, 2023	KATHLEEN DIFIORE V. TOMO PEZIC; DORA DELEON V. THE ACHILLES FOOT AND ANKLE GROUP; JORGE REMACHE-ROBALINO V. NADER BOULOS, M.D. (A-58/59/60-21 ; 087091) The Court affirms the Appellate Division's core holding that trial courts determine on a case-by-case basis what conditions, if any, to place on a DME -- including who may attend and whether it may be recorded -- with no absolute prohibitions or entitlements. The Court further affirms that video recording, in addition to audio recording, should be included in the range of options; that the parties shall enter into a protective order when a defense expert is concerned about the disclosure of proprietary information; that when third-party observation is permitted, the trial court shall impose reasonable conditions to prevent any disruption of or interference with the exam; and that, if a foreign or sign language interpreter is needed, a neutral interpreter shall be selected by the parties or, failing agreement, by the court.	Supreme
June 12, 2023	CATHERINE PARSELLS V. BOARD OF EDUCATION OF THE BOROUGH OF SOMERVILLE, SOMERSET COUNTY (A-21-22 ; 087261) Parsells did not knowingly waive her tenured right to a full-time teaching position, and the Court therefore affirms the Appellate Division's decision upholding the Commissioner's award of "full back pay, benefits, and emoluments, less mitigation." But the Court rejects the extension of Bridgewater-Raritan to impose a duty on school boards to notify, in advance, full-time teachers who consider voluntarily transferring to part-time teaching positions that they may not have a right to return to their full-time position.	Supreme
June 7, 2023	STATE V. BARRY BERRY; STATE V. KENNETH DANIELS; STATE V. LEVELL BURNETT (A-8-22 ; 086838) Judges are encouraged, when practical, to respond "yes" or "no" to unambiguous and specific questions posed by juries during deliberations rather than solely re-read sections of the final jury charge. In general, when a specific request for clarification clearly calls for and is capable of a "yes" or "no" answer, like here, then judges should respond accordingly. Here, the answer to the jury's question is indisputably "yes," one can be a "supervisor" but not hold a "high-level" position in a drug trafficking network. Instead of responding "yes" to the question, however, the judge re-read the entire model kingpin charge; opined that those elements, three and four, sounded similar; and may have implicitly suggested that being a "supervisor" is sufficient to establish that a defendant held a "high-level" position within such an organization. The response to the question was an error clearly capable of producing an unjust result.	Supreme
June 5, 2023	PHILIP PANTANO V. NEW YORK SHIPPING ASSOCIATION (A-19-22 ; 087217) Application of the Galvao multi-factor test -- which can involve matters of disputed fact and witness credibility -- is presumptively for a jury to determine. The court itself should not resolve the borrowed-employee issue unless the evidence concerning the factors is so one-sided that it warrants judgment in a moving party's favor as a matter of law. Because the evidence in this case concerning the Galvao factors was not sufficiently one-sided, the trial court incorrectly granted defendant's Rule 4:40-1 motion and deemed the worker who caused the accident a borrowed employee of plaintiff's own employer.	Supreme
May 30, 2023	STATE V. JAMIRE D. WILLIAMS; STATE V. TYSHON KELLY (A-4/5-22 ; 086598) An MDT query revealing that a vehicle's owner has a suspended New Jersey driver's license provides constitutionally valid reasonable suspicion authorizing the officer to stop the vehicle -- unless the officer pursuing the vehicle has a sufficient objective basis to believe that the driver does not resemble the owner. If, upon stopping the vehicle, it becomes reasonably apparent to the officer that the driver does not look like the owner whose license is suspended, the officer must cease the vehicle's detention and communicate that the motorist is free to drive away without further delay. Based on the specific facts presented here, the initial stop of the vehicle was valid because it was based on reasonable suspicion. However, the detention of defendants and the borrowed car was unconstitutionally prolonged after the officer recognized the driver was not the car's owner. The officer's admittedly uncertain ability to tell if he smelled marijuana was inadequate evidence of "plain smell" to justify a continuation of the stop and a search of the vehicle.	Supreme
May 9, 2023	STATE V. IZAIA M. BULLOCK (A-34-21 ; 086196)	Supreme

	Defendant's statements in the courtyard and stationhouse were both properly suppressed. Under the totality of the circumstances, the courtyard statements must be suppressed because the Miranda warnings given in the courtyard were lacking and could not have apprised defendant of his rights such that any waiver and agreement to speak to police was knowingly, voluntarily, and intelligently made. By the time defendant arrived at the police department and was given full Miranda warnings, he had already admitted to the very crime that the officers were investigating. Defendant had "let the cat out of the bag" with his admissions, see State v. Carrion, 249 N.J. 253, 275-76 (2021), so the psychological pressure of having already confessed was not cured by the administration of Miranda warnings prior to the interview at the station.	
May 4, 2023	STATE V. JOAO C. TORRES (A-15-22 ; 086812) The Court endorses and applies the two-factor test of State v. Lentz, 463 N.J. Super. 54, 70 (App. Div. 2020), authorizing delayed warrantless searches of a person incident to that person's arrest so long as both (1) the delay itself and (2) the scope of the search were objectively reasonable. The totality of circumstances here establishes such reasonableness, particularly given the officers' observation and video footage showing that defendant appeared to be removing some substance from his fingers and rubbing his clothing while he was being interviewed, as well as the risk that biological evidence would dissipate during the delay while the warrant application was processed.	Supreme
May 3, 2023	STATE V. ANTHONY MIRANDA (A-67-21 ; 086773) N.D. had apparent authority to consent to the officer's search of the storage trailer. However, the exigent-circumstances exception to the warrant requirement does not justify the officer's search of the black bag or his seizure of the weapons in that bag, and the denial of defendant's motion to suppress constituted error.	Supreme
April 3, 2023	IN THE MATTER OF THE ALLEGED FAILURE OF ALTICE USA, INC., TO COMPLY WITH CERTAIN PROVISIONS OF THE NEW JERSEY CABLE TELEVISION ACT AND THE NEW JERSEY ADMINISTRATIVE CODE (A-2/3-22 ; 086408) Section 543(a)(1) of the Cable Act does not preempt the proration requirement in N.J.A.C. 14:18-3.8. The regulation does not regulate "rates for the provision of cable service," but rather prevents cable companies from charging for cable service that customers have cancelled. The regulation does not set the "rate" that companies can charge. It simply protects cable users from paying for service they no longer want. Furthermore, contrary to Altice's alternative argument, neither Altice nor its predecessor sought or received a BPU waiver from prorating cable bills.	Supreme
March 30, 2023	STATE V. ANDRE HIGGS (A-28-21 ; 085863) The Court reverses as to all three issues and remands for a new trial. The Court prescribes a framework for trial courts to assess requests for access to internal affairs records and provides guidance for the application of that framework on remand in this case. Because the defense argues Officer Lee discharged his firearm first, defense counsel could potentially be allowed to explore Officer Lee's history of past shootings on cross-examination. On remand, defendant will be entitled to access the internal affairs file as outlined in the Court's opinion, and that evidence may be used to cross-examine Officer Lee subject to any objections pursuant to N.J.R.E. 403 or 404(b). Detective Green's testimony was based entirely on his lay opinion from watching the video, which was impermissible under N.J.R.E. 701. The video was already in evidence, so the jury was able to view the video and determine for themselves what the video showed. Finally, applying the factors in N.J.R.E. 609(b)(2), it was error for the trial court to admit defendant's remote convictions because the State did not meet its burden of establishing that the probative value outweighed the prejudicial effect of admitting the old convictions.	Supreme
March 16, 2023	STATE V. JOSEPH S. MACCHIA (A-49-21 ; 086334) The trial court properly instructed the jury on the State's burden in disproving self-defense and no specific unanimity charge was required.	Supreme
March 15, 2023	HAROLD HANSEN V. RITE AID CORP. (A-47-21 ; 086430) The Court concurs with the Appellate Division that the trial court properly exercised its discretion when it set the reasonable hourly rate for plaintiff's counsel's work, assessed the number of hours reasonably expended by plaintiff's counsel in pretrial proceedings and at trial, reduced the lodestar because of plaintiff's limited success and other factors, and determined plaintiff's application for an award of costs.	Supreme
March 13, 2023	KEVIN MALANGA V. TOWNSHIP OF WEST ORANGE (A-45-21 ; 086087) Like many older buildings, the Library needed improvements in a number of areas. But the record did not establish that it suffered from obsolescence, faulty arrangement, or obsolete layout in a way that harmed the welfare of the community. To designate property for redevelopment under the LRHL, a municipality must demonstrate that certain specified problems exist and that they cause actual detriment or harm. There is insufficient evidence in the record to meet that standard. The designation of the Library as an area in need of redevelopment is invalid.	Supreme

March 8, 2023	STATE V. KYLE A. SMART (A-6-22 ; 087315) The circumstances giving rise to probable cause in this case were not "unforeseeable and spontaneous." Those circumstances included investigating previous information from the CI and concerned citizen about defendant, the vehicle, and narcotics trafficking in the area; lengthy surveillance of defendant and the vehicle; reasonable and articulable suspicion that defendant had engaged in a drug deal; and a positive canine sniff of the vehicle. The Court therefore affirms the order suppressing the physical evidence seized from the vehicle.	Supreme
Feb. 16, 2023	STATEWIDE INSURANCE FUND V. STAR INSURANCE COMPANY (A-62-21 ; 086440) A JIF established under the Joint Insurance Fund Act affords liability protection to public entities through "self-insurance," not insurance. Here, Star's "other insurance" clause is not triggered because "self-insurance" protection through JIF membership is not "other insurance." Star's coverage is therefore primary.	Supreme
Feb. 15, 2023	LIBERTY INSURANCE CORP. V. TECHDAN, LLC (A-52-21 ; 086219) Pursuant to N.J.S.A. 2A:15-5.2(a) and -5.2(d), the trial court should have charged the jury to allocate percentages of fault and should have molded the judgment based on the jury's findings. The trial court's failure to apply the CNA warrants a new trial on remand so that a new jury may apportion percentages of fault under N.J.S.A. 2A:15-5.2(a)(2). The Court does not disturb the first jury's findings on the issues of liability under the IFPA, the WCA, or Liberty's common-law claims, or its determination of total compensatory damages. The Court finds no plain error in the trial court's failure to give the jury an ultimate outcome charge in this complex matter.	Supreme
Feb. 14, 2023	STATE V. RICHARD GOMES; STATE V. MOATAZ M. SHEIRA (A-64/65-21 ; 087192) Persons who received pre-CREAMMA conditional discharges for specified marijuana offenses -- just like persons who had pre-CREAMMA convictions for those marijuana offenses -- are no longer categorically precluded from future admission into PTI. Instead, prosecutors and reviewing courts must consider the merits of their PTI applications, without regard to the existence or circumstances of the earlier marijuana-related conditional discharges. The holding harmonizes CREAMMA and its manifest legislative intent with the pre-existing general language of the PTI and expungement statutes, including the Legislature's command in CREAMMA to apply its reforms to "any case" that arose before its enactment.	Supreme
Jan. 23, 2023	STATE V. TERRELL M. CHAMBERS (A-35-21 ; 086317) A heightened discovery standard governs a defendant's motion for pre-incident mental health records from a sexual assault victim. The Court establishes the standard applicable to a formally filed motion and also outlines a less formal process through which defendants may make requests for discovery of the pre-incident mental health records of an alleged sexual assault victim by letter to the prosecutor's office. So that the new procedural and analytical framework can be applied in this case, the Court vacates the orders under review and remands the matter for further proceedings.	Supreme
Jan. 19, 2023	STATE V. DEJE M. COVIELLO (A-54-21 ; 086673) The sentencing court, and not the MVC, has the appropriate jurisdiction over defendant's motion for sentencing credit concerning the IID requirement.	Supreme
Jan. 18, 2023	W.S. V. DEREK HILDRETH (A-46-21 ; 086633) The plain meaning of N.J.S.A. 59:8-3(b) dictates that child sexual abuse survivors who file a CSAA complaint against a public entity after December 1, 2019 -- even if their cause of action accrued much earlier -- need not file a TCA notice of claim before filing suit.	Supreme
Jan. 11, 2023	STATE V. TIMOTHY J. CANFIELD (A-53-21 ; 086644) The Court affirms as modified the judgment of the Appellate Division substantially for the reasons stated in Judge Susswein's published opinion. The Court explains why it does not believe the Appellate Division's proposed procedural rule is necessary.	Supreme
Jan. 9, 2023	STATE V. A.M. (A-56-21 ; 087057) Based on the text of the new statute and its legislative history, the Court concludes the Compassionate Release Act affords judges discretion to deny relief, in exceptional circumstances, even if the law's medical and public safety conditions are satisfied. In individual cases, when the medical and public safety factors are met, courts can assess whether extraordinary aggravating factors exist that justify the denial of compassionate release. That high standard comports with the Legislature's goal to make greater use of compassionate release. Absent any such circumstances, petitions for relief should be granted.	Supreme
Jan. 9, 2023	STATE V. EDDIE L. OLIVER (A-57-21 ; 087088) Based on the text of the new statute and its legislative history, the Court concludes the Compassionate Release Act affords judges discretion to deny relief, in exceptional circumstances, even if the law's medical and public safety conditions are satisfied. In individual cases, when the medical and public safety factors are met, courts can assess whether extraordinary aggravating factors exist that justify the denial of compassionate release. That high standard	Supreme

	comports with the Legislature's goal to make greater use of compassionate release. Absent any such circumstances, petitions for relief should be granted.	
Dec. 13, 2022	NANCY L. HOLM V. DANIEL M. PURDY (A-39-21 ; 086229) Informed by the Legislature's expression of public policy in N.J.S.A. 34:15-36, the Court concurs with the Appellate Division that defendant had a duty to advise the LLC members, at the time of the workers' compensation policy's purchase or renewal, that an LLC member actively performing services on the LLC's behalf is eligible for workers' compensation coverage, but that the LLC must elect to purchase such coverage in order to obtain it. Consistent with N.J.S.A. 34:15-36, however, the Court holds that defendant may not be held liable for breach of that duty unless the damages alleged were caused by defendant's willful, wanton or grossly negligent act of commission or omission. The Court disagrees with the trial court's assessment of the evidence presented by plaintiff on the question of proximate cause.	Supreme
Nov. 28, 2022	IN THE MATTER OF OFFICER GREGORY DIGUGLIELMO AND NEW JERSEY INSTITUTE OF TECHNOLOGY (A-33-21 ; 085064) A plain reading of the relevant statutes dictates that special disciplinary arbitration is not limited to municipal officers, so arbitration is available to public university police officers like Officer DiGuglielmo. Further, pursuant to N.J.S.A. 40A:14-210, an officer suspended with pay prior to termination is eligible to engage in special disciplinary arbitration. The Court therefore reinstates PERC's decision.	Supreme
Nov. 22, 2022	STATE OF NEW JERSEY IN THE INTEREST OF E.S. (A-41/42-21 ; 086554) The Court agrees with the Appellate Division that the trial court did not abuse its discretion in deciding to hear the defendant's waiver motion before considering his suppression motion. The Court declines, however, to adopt a preference that the Family Part hear suppression motions before waiver motions, holding instead that it is within the discretion of the Family Part to determine its schedule of proceedings and manage its calendar. The Court sets forth factors that Family Part judges should take into consideration in exercising their discretion as to the order in which to hear waiver and suppression motions.	Supreme
Nov. 21, 2022	STATE V. OSCAR RAMIREZ (A-1-21 ; 085943) After reviewing the relevant statutes and authorities that must be considered in balancing the competing interests and rights of a sexual assault victim and the person accused of the sexual offense, the Court sets forth a framework of procedures and considerations to apply going forward when a prosecutor seeks to withhold from discovery a sexual assault victim's address. Because neither the ruling of the trial court nor that of the Appellate Division sufficiently addresses the competing interests explored in the Court's opinion, the Court remands the matter for a more fulsome balancing of the competing interests.	Supreme
Nov. 17, 2022	GREEN KNIGHT CAPITAL, LLC V. GABRIEL CALDERON (A-40-21 ; 086367) The Tax Sale Law bears no hostility toward investors who otherwise meet the requirements of N.J.S.A. 54:5-89.1 when they prematurely attempt to redeem. Although the investor must always intervene before being allowed to redeem, a misstep like that which occurred here puts the tax sale certificate holder in no worse position than it would have possessed had the error not occurred. Here, because the LLC provided Calderon with more than nominal consideration and because the parties had the benefit of the chancery judge's full consideration of their competing legal and equitable arguments, the LLC's premature attempt to redeem should not vitiate the right to redeem it fairly acquired.	Supreme
Nov. 16, 2022	STATE V. JAMAL WADE (A-31-21 ; 085198) It was error to admit defendant's statements after detectives failed to honor his invocation of the right to counsel, and that error was not harmless in light of the circumstantial nature of the evidence against defendant and his statements' capacity to undermine his credibility before the jury.	Supreme
Oct. 26, 2022	MORGAN DENNEHY V. EAST WINDSOR REGIONAL BOARD OF EDUCATION (A-36-21 ; 086350) The coach's acts and omissions alleged here are governed by a simple negligence standard rather than the heightened standard of recklessness the Court applied when one participant injures another during a recreational activity.	Supreme