

John D. Rue<sup>†</sup>  
(founder)

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Krista L. Rue

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Francis X. Geier

## RUE LAW GROUP\*

A PRIVATE PUBLIC INTEREST LAW FIRM

5 LAKE DRIVE

WOODLAND LAKES, RANDOLPH, NJ 07869

(862) 283-3155 (main)

(973) 860-0869 (facsimile)

April 26, 2026

Hon. Edward S. Kiel, U.S.D.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

**RE:** *C.P., et al. v. N.J. Dep't of Edu., et al.* (No. 1:19-12807)

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Dear Judge Kiel:

I write to submit a small number of materials as supplemental factual context relevant to Section III of my prior submission addressing ongoing harm.

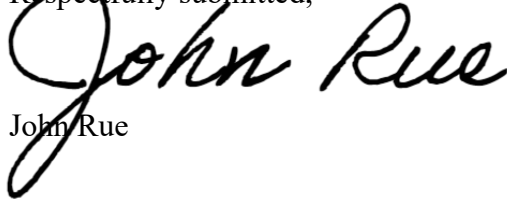
Attached are: (1) the Certification of Ashley Meyer, with an accompanying summary of case timelines compiled from publicly available decisions and parent-reported case histories; (2) the Certification of Kai Collins, a parent and non-attorney advocate with direct, ongoing contact with a large number of affected families; (3) the Certification of Favour Onyeka; and (4) the Certification of Crystal Jackson, describing her experience in due process proceedings.

These materials consist of sworn statements from parents and a parent advocate describing their direct experiences in due process proceedings, including delays, procedural irregularities, and the continuing impact on their children during the pendency of those matters. The accompanying summary is provided solely as an illustrative compilation to contextualize the timelines described in those accounts. The unsworn statement is submitted for the same limited purpose of providing the Court with an additional first-hand account.

These materials are not offered for the adjudication of any individual claim, but to provide the Court with direct accounts from affected families regarding current conditions in the administrative process during the period governed by the Consent Order.

No additional argument is submitted. To the extent that Class Counsel or the State wish to respond to these materials, Defendant does not object to an extension of the deadline for the submission of their reply brief within seven days of this letter.

Respectfully submitted,



John Rue

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*Bene facere bonum - Doing well by doing good*

<sup>†</sup> Licensed in New York as well as New Jersey

<sup>1</sup> John Rue & Associates, LLC has registered "Rue Law Group" as a DBA, to ensure compliance with NJ RPC 7.5 (incorporating RPC 7.1). The underlying legal entity remains John Rue & Associates, LLC.

# Exhibit A

Certification of Ashley Meyer (with timeline summary attached)

## CERTIFICATION

I certify that the following statements are true to the best of my knowledge and recollection:

I am the parent of a child with disabilities and have participated in multiple due process proceedings with my school district.

In or around June 2025, I attended a due process proceeding initiated by my child's school district. At the start of that proceeding, the Administrative Law Judge ("ALJ") stated that she had spoken with others about the case and made comments praising the district's attorney. I later filed a complaint regarding that conduct and received a written response stating that it did not rise to the level of an ethics violation.

In or around August 2025, a new matter was transmitted to the OAL after I had filed a due process petition due to the district's failure to provide home instruction and therapies. During a status conference in that matter, I was advised that the purpose of the call was to schedule a hearing and that no testimony or argument would be taken. Despite this, I experienced repeated pressure to settle the case. During the call, I was asked multiple times to explain why I would not agree to a settlement. I stated that I did not wish to settle. I also raised concerns about a proposed confidentiality provision. The ALJ stated that confidentiality provisions were typical and made comments suggesting that agreeing to settlement reflected whether I truly wanted relief. I continued to decline settlement unless the proposed language was modified. After the call, the district did not respond to my attempts to finalize any agreement. I later sought relief in the case, including requesting that the matter proceed based on the district's acknowledgment of owed services.

I was informed during the proceedings that the 45-day timeline would not begin until all filings were complete, which I understood to have been after the 45-Day timeline. I filed a motion to enforce the 45-day timeline. The ALJ did not rule on that motion. A scheduled call on or about September 22, 2025 was cancelled by the ALJ on short notice. A decision was eventually issued within 45 days of the completion of filings. My complaint was dismissed with prejudice, and I did not receive a finding regarding denial of a free appropriate public education.

In or around November 2025, I filed another due process petition after the district refused to provide student records and made a change to my child's individualized education program. During mediation in that matter, I was initially informed that issues relating to records could not be addressed. After I continued to raise concerns, the district ultimately produced the requested records and corrected the individualized education program, and I withdrew the petition.

In or around January 2026, I filed another due process petition after discovering that the district had failed to provide a significant number of required therapy sessions over an extended period.

During that proceeding, there was confusion regarding whether a scheduled event was a hearing or a conference, and I received inconsistent instructions regarding submission of evidence.

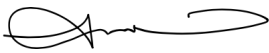
The district filed a motion for summary judgment. During a conference call, there were connectivity issues, and the ALJ referenced prior Due Process matters despite my clarification that this was a new case. I requested a hearing and explained that there were ongoing disputes, including the failure to implement services. The ALJ granted summary judgment based on representations that services would be provided in the future.

I submitted filings explaining that services had not been implemented and that the issues remained active. These arguments were not addressed in the decision. During the proceeding, the ALJ indicated that the timeline could be extended based on filings and communications, which I understood to further delay resolution. I repeatedly contacted the clerk's office seeking updates and was informed that a decision was pending. I ultimately received a decision dismissing my case with prejudice. The decision did not address several issues I had raised, including ongoing lack of services.

Based on my experiences, I encountered repeated delays, lack of clarity in scheduling and procedure, and difficulty obtaining timely resolution of due process matters without objection or escalation.

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.

Date: April 20, 2026

A handwritten signature in black ink, appearing to read 'Ashley Meyer', with a stylized flourish at the end.

Ashley Meyer

Case	Transmitted	Date of Decision	Number of Days
OAL DKT. NO. EDS 01028-24	January 25, 2024	Between February 14, 2024, through September 9, 2025 parent was forced into 10 different status calls,. Judge admitted it was excessive but necessary. Parent ultimately stopped calling in and Judge dismissed the case December 19, 2025	694
AGENCY DKT. NO. 2025-38819	March 25, 2025	Parent asked for Due Process not mediation. Mediation was held regardless on April 3 and April 29. Then prehearing conferences on May 6 and June 27. Judge then claims parent agreed to an extension to August 4. Decision still wasn't until October 27, 2025.	216
OAL DKT. NO. EDS 05891-25	April 30, 2025	Hearing was held on May 29, 2025, Decision October 3, 2025	156
OAL DKT. NO. EDS 21338-25	October 9, 2025	February 20, 2026	134
OAL DKT. NO. EDS 14603-25	December 3, 2025	February 11, 2026	71
OAL DKT. NO. EDS 14938-25	August 1, 2025	(Hearing was scheduled for November 12, 2025) Decision January 9, 2026	161
OAL DKT. NO. EDS 20205-25	December 9, 2025	January 21, 2026	43 days
OAL DKT. NO. EDS 15799-24	November 8, 2024	Conference call on December 10, 2024 Hearing scheduled February 10, 2025. Decision May 29, 2025	202 days
OAL DKT. NO. EDS 16713-24	November 26, 2024	“several telephone conferences “ Decision on a summary judgement motion was made on March 25, 2025	119 days
OAL DKT. NO. EDS 13507-24	September 27, 2024.	Motion for summary decision dated January 7, 2025. Final Decision March 20, 2025	174 days

**Others:**

- OAL DKT. NO. EDS 01532-26 Pro/se - Unsure how long until decision but it was filed January 15, 2026 and it took 20 days along just to survive a sufficiency challenge by the school.
- OAL DKT. NO. EDS 15122-24 Pro/se parent filed November 18, 2024, hearing wasn't scheduled until Hearing was scheduled to be held on December 13, 2024, and January 6, 2025 which would be 50 days.
- OAL DKT. NO. EDS 15034-24 Pro/se parent filed September 23, 2024. Order says hearing was November 26,

2024 was hearing, which was already 64 days letter. Then order says parent “acquiesced” to the school’s request to extend time. Parent didn’t get decision until October 1, 2025 over a year after she initial filed.

# Exhibit B

Certification of Kai Collins (Parent Advocate)

I, Kai Collins, certify as follows:

I am a parent and a non-attorney advocate who provides pro bono support to families navigating special education disputes, including due process proceedings, across New Jersey. I am affiliated with The New Jersey Coalition for Learners, where I help facilitate a private support network of more than 2,500 parents built over the past two years.

Through this work, I am in ongoing, direct communication with a significant number of families currently navigating special education issues, including active due process cases.

I have personally spoken with multiple parents whose cases were filed after February 16, 2023, the date of the Consent Order intended to ensure timely resolution of these matters. What I hear from families is consistent. The problems are ongoing.

Parents report that their cases are not moving within expected timelines. Instead, they describe repeated adjournments, motion practice, extensions, and delays,

many of which are unexplained or outside of their control, resulting in cases that stretch far beyond what families are told to expect.

Parents also report that even when their cases are moving, they are not always able to fully present them. Families describe difficulty getting educational records, limitations on what evidence is considered, issues being narrowed, and, in some cases, decisions being made without a full hearing.

I have also heard from parents who participated in teleconference proceedings where recording was denied, leaving them without any way to preserve what occurred.

The parents I speak with are often unrepresented, while school districts are represented by attorneys, frequently supported through insurance-funded defense.

Parents consistently describe how difficult it is to navigate the process, understand what is happening, and respond in real time under these conditions.

I have also spoken with both unrepresented parents and parents who have attorneys about whether they are willing to submit certifications or otherwise document their

experiences. Pro se parents have expressed hesitation about putting anything in writing because of concern about what could happen in their active cases, including how it may be viewed by the Administrative Law Judge.

Parents who are represented by counsel have reported being advised not to submit certifications or participate in outside efforts while their cases are still pending.

As a result, families with active cases are often reluctant to come forward—not because these conditions do not exist, but because they feel there is risk in speaking while their case is ongoing. This makes it difficult to document what is happening in real time, even though the issues are widespread.

Critically, parents report that while these cases remain pending, their children are not receiving appropriate services or are stuck in placements that do not meet their needs. These delays are not neutral. Families describe ongoing educational, social, and emotional harm during periods that matter for their child's development.

Based on the volume and consistency of what I am hearing, these are not isolated situations. These conditions are continuing in cases filed after February 16, 2023, and remain present under the current framework.

As of the date of this certification, based on my direct work with families, parents without legal representation are, in practice, the primary way these issues are identified and brought forward.

At the same time, those same parents are navigating a complex legal process without counsel, while the other side is represented. And as described above, many are hesitant to speak outside of their own case because they are worried about the consequences while their matter is still pending.

This creates a situation where the people most directly affected are also the least able to safely and effectively bring these issues forward. As a result, these problems can continue without full visibility, even though families across the state are experiencing the same patterns.

Through my work with families, I also see the impact these extended proceedings have on both families and public resources. Parents consistently describe disputes that continue for long periods of time, requiring ongoing participation in a complex process while school districts remain represented throughout.

At the same time, families report that delays and procedural barriers often prolong disputes rather than resolve them. From the parent perspective, this creates a system where prolonged disputes can continue without timely resolution or meaningful correction, even as resources continue to be expended and children remain without appropriate services.

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.

Date: April 22, 2026

Signature: *Kai Collins*

Name: Kai Collins

# Exhibit C

Certification of Favour Onyeka

**PARENT CERTIFICATION**

I, Favour Onyeka, certify as follows:

I am the parent of a child with a disability who has been involved in special education due process proceedings in New Jersey.

On December 16, 2025, I requested independent educational evaluations for my child, including an educational evaluation, a psychological evaluation, and an augmentative and alternative communication (AAC) evaluation, based on concerns regarding my child's needs.

On January 5, 2026, the school district filed for due process seeking to deny my request for those evaluations.

The matter was transmitted to the Office of Administrative Law and filed as a contested case on January 15, 2026.

I participated in multiple teleconference proceedings related to my case. I requested that these proceedings be recorded so that I could maintain an accurate record; however, my request was denied for at least two of those conferences. As a result, I do not have a complete or reliable record of what occurred during those proceedings.

I participated in this process without legal representation due to the cost of retaining counsel, while the school district was represented by an attorney. This created a significant imbalance in the proceedings.

I proceeded with the assistance of a pro bono, non-attorney educational advocate. Despite this, I was advised during the proceedings that my advocate should be providing legal guidance, which she was not permitted to do. This further limited my ability to understand and respond to legal and procedural issues as they arose.

As a result of the process and its timeline, my child has not received the independent evaluations requested and has not been evaluated in all areas of suspected disability. This has delayed identification of my child's needs and the development of appropriate supports and services.

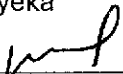
During the pendency of these proceedings, my child has not been educated in a setting that meets her needs. The impact of this has been ongoing and includes educational, social, and developmental harm during a critical period.

The delays and limitations within this process have not been neutral. They have directly affected my child's ability to access appropriate education and services.

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.

Date: April 22, 2026

Name: Favour Onyeka

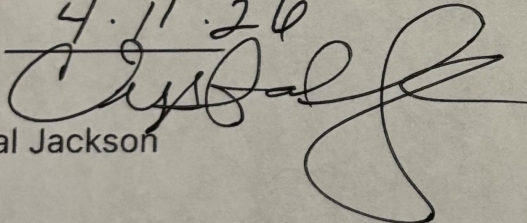
Signature:  \_\_\_\_\_

# Exhibit D

Certification of Crystal Jackson

3. The resolution period in my case expired on or about September 20, 2025, which should have triggered the 45-day timeline for a due process hearing and decision.
4. Despite that deadline, my case was not scheduled for a hearing within the 45-day period.
5. Instead, there were multiple telephone conferences over a period of months. These conferences were not requested by me and did not result in a timely hearing.
6. My case was ultimately placed on a hearing calendar for February 25–26, 2026, which was several months after the expiration of the 45-day timeline.
7. At one point, an extension was noted for "time to review documents." I did not meaningfully agree to delays that extended my case for several additional months.
8. The repeated conferences and lack of timely scheduling significantly prolonged the process and delayed any resolution of my claims.
9. As a result of these delays, I waited nearly five months after the expiration of the resolution period without receiving a hearing.
10. Due to the length of these delays and the lack of timely resolution, I ultimately withdrew my due process petition in or about March 2026.
11. I did not withdraw my petition because my concerns were resolved. I withdrew because of the delay and the impact that delay had on my child's access to services and relief.
12. Based on my experience, the delays in my case prevented me from obtaining a timely hearing and resolution.

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.

Date: 4.11.26  
  
Crystal Jackson