



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Order – Motion to File Within Time Granted

Lorraine Gallagher
Complainant

GRC Complaint No. 2025-283

v.

Old Bridge Police Department (Middlesex)
Custodial Agency

Custodian of Record: Katherine Hutchinson
Request Received by Custodian: August 8, 2025
GRC Complaint Received: September 25, 2025

Order: The Complainant attempted to file a complaint on August 19, 2025, alleging she was denied access to a July 24, 2025 request on August 8, 2025. On August 21, 2025, the GRC advised of the proper method for filing a complaint and included a copy of the Denial of Access Complaint (“DOAC”) form. On September 25, 2025, the Complainant sought an update on her complaint and the GRC advised her that it never received same. The Complainant alleged she sent the completed DOAC form to the GRC on August 22, 2025 and included a copy thereof.¹ The Complainant subsequently submitted a motion to file within time on September 29, 2025. Custodian’s Counsel did not object to the complaint being accepted as within time.

However, the evidence of record contained in the motion to file within time shows that the Complainant submitted an e-mail request not referencing OPRA to the Township of Old Bridge (“Township”) via email on July 24, 2025 and again on August 6, 2025. On August 8, 2025, Records Clerk Marlo Bovo stated that Township Police Department policy did not allow for disclosure, but that she may submit an OPRA request; the Complainant did so on that day. Thereafter, as confirmed by Custodian’s Counsel, the Township did not respond within seven (7) business days, or August 19, 2025, because the OPRA request was sent to Mr. Bovo and not the Custodian. Thus, and notwithstanding the Complainant’s failure to provide evidence that she submitted her DOAC to the GRC on August 22, 2025, the actual “deemed” denial date of August 19, 2025 places the complaint filing within the forty-five (45) calendar day statute of limitations. Thus, this complaint shall be accepted as within time. N.J.S.A. 47:1A-6.

Effective Date of Disposition: March 31, 2026

Prepared By: Frank F. Caruso
Executive Director

Date: March 24, 2026
Distribution Date: April 2, 2026

¹ The GRC notes that it has no record of ever receiving the completed DOAC on August 22, 2025 and the Complainant did not provide evidence of such transmission with her motion to file within time.