



NEW JERSEY GOVERNMENT RECORDS COUNCIL

Administrative Complaint Disposition – Motion to File Within Time Denied

TRIDEV, LLC
Complainant

GRC Complaint No. 2026-316

v.

Township of East Hanover (Morris)
Custodial Agency

Custodian of Record: Felicia A. McDonald
Request Received by Custodian: Unknown
GRC Complaint Received: May 29, 2026

Complaint Disposition: The Complainant verified the instant complaint on May 28, 2026, alleging a “deemed” denial of access to their OPRA request on April 2, 2026, or fifty-seven (57) days prior. The Complainant argued the GRC’s communications regarding the Complainant’s insufficient complaint filing tolled the statute of limitations period and created an irreconcilable ambiguity as to the actual date same expired. The Complainant argued they cannot be charged with missing a deadline that expired during a “cure period the GRC required.” Custodian’s Counsel objected to the motion on the basis that the GRC was clear in its requirements for filing a proper complaint both in time and out of time.

Upon review, the GRC is persuaded that this complaint should not be accepted as filed within time. Specifically, the Complainant attempted to file on April 24, 2026, within the statute of limitations; however, it was deficient. The GRC returned the complaint on April 28, 2026 advising how to file a Denial of Access Complaint properly and that no complaint would be considered filed until any deficiencies were cured. The GRC also apprised the Complainant of the statute of limitations and the necessity to include a motion if the complaint were refiled out of time. However, the Complainant waited until May 19, 2026, or the forty-six (46) days after the April 2, 2026 “deemed” denial, to refile the complaint. Thus, the Complainant failed to show good cause to permit the complaint to proceed out of time. Therefore, this complaint shall be dismissed.

Applicable OPRA Provision: “A person who is denied access to a government record by the custodian of the record, at the option of the requestor who is accurately identified by name, may, within 45 days of the date of denial . . . file a complaint with the Government Records Council” N.J.S.A. 47:1A-6.

This is the final administrative determination in this matter. Any further review should be pursued in the Appellate Division of the Superior Court of New Jersey within forty-five (45) days. Information about the appeals process can be obtained from the Appellate Division Clerk’s Office, Hughes Justice Complex, 25 W. Market St. PO Box 006, Trenton, NJ 08625-0006.

Effective Date of Disposition: June 30, 2026

Prepared By: Maria M. Rossi
Staff Attorney

Date: June 23, 2026

Distribution Date: July 1, 2026