

Edwin B. Minchin III

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Pro se

EDWIN B. MINCHIN, III, Plaintiff, v. WILLIAM H. PANDOS, ESQ.; and LAVERY, SELVAGGI & COHEN, P.C., Defendants,	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: WARREN COUNTY DOCKET NO. WRN-L-000452-25 <i>CIVIL ACTION</i> PLAINTIFF'S SUPPLEMENTAL WRITTEN ARGUMENT (PART TWO) REGARDING DEFENDANTS' RULE 4:6-2(e) MOTION TO DISMISS
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Honorable Christopher M. Troxell, J.S.C.
Warren County Superior Court
Warren County Courthouse
413 Second Street 2nd floor
Belvidere, NJ 07823

Dear Judge Troxell:

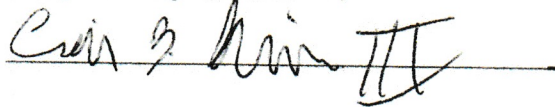
Oral argument on Defendants' Rule 4:6-2(e) Motion to Dismiss was held on 2/27/26 and Due to time limitations, I was unable to complete delivery of the second part of my prepared oral argument.

During argument, the Court noted that most cases do not go to trial and encouraged the parties to try to work something out beforehand. I understand and respect that guidance. From my perspective, honest and complete discovery is the key to the truth in this case. Once both sides exchange discovery fully and in good faith, I believe the facts will speak for themselves and any fair resolution will fall into place. I have already served Defendants with written discovery in this action on 2/13, and I am prepared either to discuss resolution on a truthful record AFTER full discovery is received and reviewed or, if that is not possible, to continue pursuing my claims through the legal process to the fullest extent the law allows so that what happened to

me does not happen to other people. Defendants were the ones who first chose to come after me in court in the Johnson litigation with aggressive threats about taking my money, wages, and property and punishing me "to the fullest extent of the law", only stopping because they had zero proof their verified complaint was legitimate and in good faith; I am simply asking to use the same court system and laws, lawfully and in good faith, to seek FULL accountability.

The attached "Supplemental Written Argument (Part Two)" simply memorializes the remainder of what I was prepared to say at oral argument. It does not raise any new issues, claims, or legal authorities beyond those already set forth in my previously filed written opposition and in the portion of my oral argument the Court heard. It is submitted solely so that the written record reflects the full scope of my position.

Respectfully submitted,

A handwritten signature in cursive script, reading "Edwin B. Minchin III", written over a horizontal line.

Edwin B. Minchin III
Plaintiff, Pro Se

3/2/26

ORAL ARGUMENT PART 2

We're here today because I'm suing William H. Pandos personally and his law firm Lavery, Selvaggi & Cohen. Like any other person that gets sued they didn't like it and have since motioned to dismiss the complaint. I, feeling 100% justified in filing the complaint, opposed their dismissal and now we're here today to talk about its legitimacy.

We first have to ask ourselves WHY am I suing them and so therefore we start at the beginning. Mr. Pandos got a call from John Johnson I'm guessing July/August of 2025 and was told that I had a website up that needed to be taken down IMMEDIATELY. Mr. Pandos upon receiving this request and doing whatever "investigating" he does according to his website bio, prior to acting, and developing a "tailored strategy" with Mr. Johnson thought it was a great idea to send me a cease and desist letter with a THREAT of filing a lawsuit against me in 48 hours if I didn't take the site down and a THREAT of punishing me to the fullest extent of the law. Up to this point I'd never heard of William H. Pandos or Lavery, Selvaggi & Cohen before.

This letter, even though it came to me via email only, honestly made me a little nervous, as I was receiving an official looking document from a lawyer COMMANDING me and THREATENING me, but being as I knew I wasn't lying on the website and the fact that this letter was only sent via email, not that a certified mail would've made any difference, I blew it off. Can't say I thought Mr. Pandos was just gonna give up and leave me alone at THAT point, although I'm sure he wishes he did now, but I just waited. While waiting I wrote up a hard hitting rebuttal to that cease and desist letter though which countered everything he wrote in anticipation of me having to go to court real soon and speak though. But 48 hours came and went and NOTHING.

Now at this point I'm laughing a little because I called this Pandos guys bluff and he didn't act. To be honest I thought Mr. Pandos gave up for a minute NOW because it took NINETEEN DAYS for him to contact me again.....but he did.....No, not with a lawsuit like he promised. This was another threatening email with the same commanding terminology. HELL NO I still wasn't taking

anything down because I was still telling the truth and that's not how I'm built. Gotta admit there was some anger inside me by this point as well now. This is now the second time somebody I don't even know is COMMANDING me and sending me THREATS online.

Gonna stop right there for a minute and address this COMMANDING and THREATENING issue I was experiencing. When I went to Johnson Cadillac to buy this car I was 6'1 240 lbs., lean, vascular, in a tank top, with a shaved head, covered in tattoos, a beard half way down my chest and confident because I could handle myself. I'm not a tough guy by any means but I know how people view me when they see me and how they react when they hear me speak in real life and know someone would NEVER COMMAND me like that or THREATEN me like that to my face. Ask the sales manager at Johnson Cadillac what I looked like and how he felt when I started speaking after he told me Johnson Cadillac doesn't have a front end rack, doesn't do front end alignments and if they had to certify every front end that left that building then NO car would be certified. Ask Jason Palecco what he thought when he saw me for the first time in person and how he felt after trying to offer me something to keep me in the car after scamming me and what I sounded like in his office that day. Ask the finance manager how I sounded on the phone and how HE felt when HE saw me in person and told me to my face "I'm just the finance manager, I have nothing to do with what they're lying to you about in the garage ". I know people feel like this because most of my adult life people would tell me things like they wouldn't want to make me mad, wouldn't want to get on my bad side and wouldn't want to piss me off. So I knew this Pandos guy would be the same, and no offense, but I can tell by looking at your picture and seeing your actions now that you've never been in a physical confrontation in your life and so this makes you what is called a KEYBOARD WARRIOR. But when I did my research for this I came across a term used in this field that fits you perfectly. PAPER TIGER. When you're close enough to someone where you can touch them people act MUCH differently. That's a FACT.

September 2 came though and I heard a knock on my door. Upon opening the door I'm greeted by an officer with a badge and a summons with a complaint with my name on it. The little bit of laughing I felt when Pandos lied about his 48 hour deadline quickly disappeared that day and was replaced with more nervousness and anxiety than the cease and desist letters together gave me.

This summons told me I had 35 days to respond, told me of possible legal assistance from the state and told me my money, wages and property could be seized. The complaint stated that I DEFAMED these individuals, that I wrote FALSE statements, that I had MALICIOUS conduct and is forcing me into court to have a jury trial. I don't know how to answer this complaint and I'm gonna have to go to court, there'll be a judge, there'll be a jury, I'll have to talk to I'm sure. WHOA!!!!!!

I'm not a lawyer and I don't play one on TV. I've never even worked in an office before. I've been a physical hands on guy my whole life and I got denied public assistance to help answer this, so now I had to figure it out on my own. I figured it out enough to get my answer in, and considering the circumstances of my website I obviously filed some legitimate counterclaims as well.

This is when things got interesting and took a MAJOR turn. Pandos went from this is the most important thing in the world, we need to act IMMEDIATELY in 48 hours, blah blah blah to SILENCE. I was figuring stuff out slowly. Albeit my documents were still sloppy, I served a safe harbor notice AND discovery to Mr. Pandos right after my counterclaims and Mr. Pandos chose not to respond to either. Pandos true colors were shining already by now with him ignoring his legal obligations I served him AND waiting until the last possible day to file his motion to dismiss my counterclaims AND for the FIRST TIME now wanted arbitration.

I did some research and in arbitration discovery is more limited and things can easily be kept away from an opposing party. SOUNDED GREAT though demanding a jury trial coupled with some COMMANDS from a guy with a fancy law degree. That should scare anybody right? And being as the goal was to scare me into submission and NEVER enter the court, this is exactly what Mr. Pandos did. So that made sense why they changed course. At this point it begs to ask the question if Pandos "fully investigated their claims" and "explored every possible defense" with them like his website bio so proudly boasts. The only defense I saw was the Bob and Weave. And if he did, his website bio also states he develops a "tailored LITIGATION Strategy". Again we all want to hear what this strategy was because it sounds like it was all posturing to get me to flinch. Your website bio also states you provide clients with an "unbiased assessment of risks and rewards in high stakes situations". You can't be serious putting that on your bio. THAT is DEFINITELY false advertisement!! Did you tell them that there was a chance that I could actually respond? Did you tell them I could file counterclaims against them

for the scam their running? Did you warn them that when your threats don't work you result to delays? And when delays stop working that you start using the VICTIM CARD?

NO, because you read THIS book by its cover, saw some bad words on a website, figured this was like shooting fish in a barrel and just wanted those shiny nickels Mr. Johnson was gonna give you. I googled how much a cease and desist letter cost and correct me if I'm wrong but it cost less than \$1,000. That's a lot of money for something I can write up in a couple of hours. But on the big scale of things \$1,000 is NOT a lot of money, and regardless the amount, one shouldn't stake their reputation on an EASY CATCH without doing ANY research because things can spiral out of control real fast. If you did ANY research William, in your lawsuit quoted version of my website, you wouldve seen I stated in there that I'm a nice guy.... A really nice guy..... Until I'm not a nice guy. Then..... I'm REALLY, REALLY, NOT a nice guy anymore. I warned you but you chose not to read or heed that warning. I modified my website early on so it no longer says that statement. But I should put that back on there because that statement is SPOT ON!

Mr. Pandos had a sense of urgency in August with his COMMANDS and THREATS but when it came time to poop or get off the pot he ran out the bathroom. All those claims of me defaming them, making false statements, falsely framing them and costing their client a lot of money in lost business would make any qualified, licensed, competent attorney act IMMEDIATELY and start showing evidence to prove their story, get swift justice and punish that lying, good for nothing, defamer to the fullest extent of the law like their client deserves. Right? That is of course unless the client is a lying scam artist, has zero proof to prove me wrong and their lawyer did absolutely ZERO background research. And that is the exact situation here so these 2 groups of individuals are a match made in heaven and deserve each other.

We had our first oral arguments and like today I was prepared and when I spoke everything was well documented. I was feeling more confident by this point with what I was filing and knowing Pandos filed a frivolous lawsuit against me, failed to answer the safe harbor notice I sent him, failed to answer the discovery I served him, and the fact that this guy came after ME threatening to punish ME to the fullest extent of the law, I filed this lawsuit against him and was gonna let him know what it feels like to have a badge come knock on his door and serve him papers. Judge Troxell eventually and correctly ruled in my favor regarding

dismissal and arbitration and I'm sure, after it was ruled in December in my favor, that panic and anxiety were soaring at Johnson Cadillac and In William Pandos head.

The only times Pandos acts with any urgency is when he's in trouble and so he filed his appeal IMMEDIATELY.

If I was William H. Pandos I'd be nervous and anxious as hell by now after all this and let's go over the reasons why.

Reason #1 is William H. Pandos is a "professional", licensed attorney, who failed on many levels while threatening me and lying to the court. And me? I'm a nobody off the street with nothing more than a potty mouth right? This is YOUR world. YOU Brought ME here. You went to school for this? AND I just showed to the court and to anybody that will see this transcript that your website bio is a complete LIE.

Reason #2 YOU brought ME into your world with a threatening cease and desist letter with a 48 hour deadline that YOU didn't follow through on. That sounded like HARASSMENT. How come when you created your Certification for THIS lawsuit though when you describe that same cease and desist letter you sent me on August 8, 2025 not only do you not make any mention of your threat to bring this matter to COURT in that document, you make no mention that arbitration was NEVER asked for at anytime there either, you don't acknowledge that your 48 hour timeline was not acted on and that you threatened to punish me to the fullest extent of the law? You know why you didn't mention those small details? Because they make you look bad. But it's all true, so that's why I'M putting them on the record here. You're welcome.

Reason #3 YOU threatened to punish ME to the fullest extent of the law in the COURT via JURY, to scare me with no intent of following through in court and got called out on it...and NOW you had to file an appeal. This is after YOU told the court in YOUR VERIFIED complaint that YOU, William H. Pandos, Esq, are hereby designated as TRIAL counsel for the plaintiffs, that YOU DEMANDED a JURY TRIAL and that YOU CERTIFIED there were no other pending ARBITRATION proceedings. Can't get much more assuring of what someone's intentions are and where they want to be than that. And not only did you want to bring me to court, you brought me to your home field in Warren County. I'm sure being it's your home field you sat in front of Judge Troxell MANY times before and now you're worried that someone not even schooled in law that YOU brought

to your home filed in front of a judge you know and conduct business with regularly with expose you for who you are in the worst possible platform.

Reason #4 YOU filed a VERIFIED Complaint which is the equivalent to sworn testimony and considering I haven't defamed anyone, made any false statements or had any malicious conduct that sounds like perjury. Let's face it, if there was a lick of evidence that the car I purchased was CERTIFIED and passed, it would've been on the docket back in September. There isn't. You know why? Because I told the truth and there is NOTHING that they can produce that'll exonerate them from my claims. In YOUR VERIFIED complaint YOU state PRIOR to delivery of the vehicle, suspension issues were found and that a body shop was doing the repairs. Considering I bought a CERTIFIED used vehicle from Johnson Cadillac and the car shouldn't of needed ANY repairs PRIOR to delivery YOU YOURSELF knew when you filed the VERIFIED complaint that the car could not have been CERTIFIED and that's why you wrote in your FACTS that the car was only a CERTAIN car. You knew I was telling the truth then but it's too late for you now, you're tangled in the same web they are.

Reason #5 When YOU filed your VERIFIED Complaint you also filed an Order To Show Cause which in my research I've learned is like an emergency 911 call. The judge denied it. If it was such an emergency back in August of 2025 and You and Johnson Cadillac can prove that I didn't get scammed buying the car, then why 6 MONTHS later have you not shown any proof of them not scamming me on that purchase? Because the proof proves Johnson Cadillac is a scammer. The ONLY thing you've done is try to run away and....delay.... delay.... delay.

Reason #6 You convinced Jason Palecco that it was a safe idea for him to sign the VERIFICATION, and considering the lies that have been exposed so far with just the voicemails and the few admissions, Jason is sitting in an extremely HOT seat right now with his VERIFICATION stating he knows he'll be punished when caught lying and it's partly YOUR fault.

Reason #7 YOU didn't answer the FIRST safe harbor notice I sent you which caused me to file a motion for sanctions against you. I gave you an opportunity to withdraw or amend your complaint against me but that was obviously beneath you to even answer, so you just ignored me. You think that helped matters?

Reason #8 YOU didn't answer my FIRST discovery I sent you which caused me to file a motion to compel against you. Really didn't want to go after you like I was Johnson Cadillac. I have enough on my plate in life already and again I'm not

a lawyer. But in order to prove my case there I need discovery but you continued to help aiding and abetting the scammer so I added you as well to the list. You definitely deserve to be there. Congratulations.

Reason #9 Anybody can easily see that if I sent a detailed letter to the Warren County College where you work describing your behavior in the Johnson matter on September 15, Received a Cease and Desist Letter from the colleges counsel on September 18, and over the course of September 18-22 had a 3 email interaction with the same college counsel, that sometime before November 6, the college, the colleges counsel or someone else would've contacted you in some way, shape or form and made you aware of the letter I sent. It's unfathomable to think otherwise. At that time you were the sitting president of the Warren county Bar Association or the IMMEDIATE past president it's hard to tell which, but you're gonna tell the court that, that position is held in the dark about a negative letter sent to the college they work at for about 7 weeks? And if that is so then they would've never told you if you weren't involved in this case? This is easy to see.

Reason #10 YOU had a second set of safe harbor notices sent to you, to all named individuals AND Johnson Cadillac AND AGAIN you refused to answer. How were you gonna explain to Mr. Johnson that he's not only getting countersued but is being asked to alter or withdraw his own lawsuit against me? Maybe you never told him about either safe harbor notice. Either way do you think ignoring a second request was beneficial to your client or to you personally?

Reason #11 YOU were sent a SECOND Discovery this time to all named individuals AND Johnson Cadillac. You didn't answer the first Discovery and got motioned to compel AND you had a sanctions motion waiting already against you for failure to comply with a safe harbor notice SO when THIS Discovery Request hit your desk no doubt you were nervous. And just like everything else with you, you waited until the very last day to give me the admissions. You were still obligated to give me the Requests for Interrogatories and the Request for Documents which were due WAY before the stay was granted but that type of exposure would expose Johnson Cadillac so that's why that wasn't given but some of the admissions show critical contradictions to the voicemails I filed and considering the complaint was VERIFIED, PERJURY is looking real.

This brings us to Mr. Moscagiuri filing this motion to dismiss my complaint and the 'What the Hell did he just say?' Certification of William H. Pandos in support

of their dismissal. In your certification you complain about the review I wrote on the lawyers.com website and about the actions YOU took that I wrote about there. If you actually read the review I wrote it shows me as opposing you in court but I couldn't check a box for THAT category so I did the best I could to get my truthful message out. Like I said on my website I'm not a tech guy and I only meant to put the review on the Lavery, Selvaggi, Cohens page but I've since tried correcting it some by trying to add that review on Mr. Pandos page because it was HIS actions but it didn't load there. I can keep trying to get it correct if you'd like. I don't know how to remove a review but if I could I'd remove the one that got logged accidentally against Mr. Cohen. Tell HIM I'm sorry for that.

Then you tell the court that I STALKED YOU to discover where you worked and as soon as I read that I knew you were in waaaaaay over your head in these lawsuits. It states right on your lawfirm website bio that you're a Senior adjunct professor at the college and you teach courses in legal studies there. Do you know why it says that on your website? Because you WANT people to come look at it...and go WOW this guy MUST be smart.....hes not only a lawyer but a professor, and not just a professor but a SENIOR professor there. Same reason you put you were a past president and trustee of the Warren county Bar Association on there, you WANT people to come, be impressed if they hire you and be scared if they oppose you. I had to Google how someone becomes president of a Bar Association because I thought there's no way. That system sounds like a participation trophy where just a few people pick a person to put on the bottom rung of titles and everybody else just agrees and that person starts their journey up the ladder to eventually become president and everybody eventually gets a turn. I'm sure this is done to bolster everybody's BIO page to help justify a more ridiculous fee but in this case it proves all it does is add fluff.

You go on to assure the court that you were completely unaware of me contacting the college and claim I weaponized information against you in that letter. What I wrote in the letter was all true, the same as my website and the same as my lawyers.com reviews. You go on to show a quote you made from the November 6 hearing where you tell the court that you "had no idea until you saw my filing the day before the hearing that I had contacted the college" as if your self serving statement is Evidence of any truth.

Then out of complete desperation you bring up some unrelated domestic violence victim story telling us that you had been TRAUMATIZED by an intimate

partner in similar ways to what I had done to you. You start crying about suffering from severe anxiety, emotional distress and claiming that you are now RETRAUMATIZED. Similar in ways to what I did to you? WHAT?! Yeah I'm dying to hear ANYBODY try and explain how THAT is relative to the case. But considering how fragile you were prior to the Johnson situation maybe you should've continued healing and shouldn't have accepted Mr. Johnson's offer of harassing me. But considering you did, did you tell him of your frailty?

It's all those self inflicted reasons I mentioned why you are nervous, anxious and feeling RETRAUMATIZED. All that law school and fancy degrees, teaching positions in a college and titles held on some laughable board and all you had was threats to fight me in court but when I said ok and showed up to fight you ran away. This is because I have the one thing that matters MOST in court. I have the truth. Nothing you or Johnson Cadillac can do to take that away from me.

Prior to August 8, 2025 I'd never heard of William H. Pandos. YOU found ME and made first contact by sending ME a cease and desist letter threatening to punish me to the fullest extent of the law. YOU sent a badge with a summons and complaint to my house with wording talking about taking my money, wages and property. YOU filed that VERIFIED Complaint forcing me to come to Warren County Courthouse. Like I told you I'm not a lawyer, I don't play one on tv and I've never even worked in an office before and I was forced to answer that complaint on my own and I'm not crying about being traumatized.

You're a lawyer with a law degree and obviously this wasn't your first rodeo. Not only are YOU a lawyer but you have a TEAM of lawyers working with you to assist you with whatever you need. This TEAM works in an office and I'm sure you all have nice, powerful computers with probably double or even triple screens on your desks to make work even easier.

Not only am I not a lawyer. I don't have any lawyers helping me. I don't have a nice office with a desk OR a computer either. I've been creating these documents on my iPad in my house with my phone as a second screen to help, by MYSELF. You know what that makes me have to do? I have to manually file everything at the court house because I don't have a computer. Just showing you another hardship that I haven't complained about.

Mr. Pandos had help coming from all directions. He had Mr Moscagiuri filing stuff for him in the Johnson case, he had Denise Weeks emailing me and mailing

me stuff, he had Hailey Hotchkin emailing me and mailing me stuff. While I'm by myself over here and he's the one getting anxious?

This brings us to Moscagiuri's February 23 letter, where, he like Pandos, starts off crying that I'm filing stuff too fast. Are these guys kidding me? Pandos cried that I was filing too many motions too quickly in the Johnson case when the motion to compel, motion for sanctions, motion to bar and strike and the second motion for sanctions were all filed because of Pandos' unwillingness to oblige by the court's rules. Moscagiuri falls right in line complaining that I filed my Opposition to their motion to Dismiss here a mere 3 days after. Yeah, just because Pandos likes waiting till the last minute to file anything unless he's in trouble doesn't mean I'm slow or have to delay anything. You guys should rename your lawfirm to Late, Shunned & Crying. Moscagiuri filed THIS letter HOURS after I filed my opposition so if the pattern @ Late, Shunned & Crying stays true then he's nervous like Pandos was when he rapidly filed his appeal.

Moscagiuri is standing tall with Mr. Pandos though by agreeing that an irrelevant victim of domestic violence case elsewhere is relevant here in this case. And yes I wrote on my exhibit that I was "Looking forward to this oral argument". I was. I couldn't wait to hear you try making that relevant to this. Mr. Pandos came after ME and wanted to fight ME in court 6 months ago and all he's done since is ignore, delay, avoid and cry. That on top of trying to compare what transpired between us to the abuse he suffered elsewhere is laughable. You are sounding more and more desperate and making it look like you should never have chosen to be a lawyer. Not everybody can do every job out there even if they've been "schooled". Just because someone takes a karate class doesn't mean they should fight in the MMA. It's funny though how you were crying to the judge in that case that you didn't like whatever was happening to you there but you thought it was a good idea to harass and threaten me here. That regret of harassing me and threatening me is what is fueling that anxiety and causing you to be retraumatized. It was your own laziness and greed that got you where you are. Nothing else. Congratulations.

Remember how we all used the Cole Factors to determine whether or not a party had waived its rights to compel arbitration? Well I came up with my own factors and these relate to what an attorney should consider before they go after somebody. Kinda like a checklist a lawyer should go over to make sure they are doing things correctly and safely for not only themselves but for their client, and who knows

maybe yall already have this in the lawyer world and maybe Pandos teaches something like this in Warren County College but I'm sure it's not titled the Minchin Factors like these are. Ill read them and then We can then think whether or not Pandos followed anything here.

Factor #1 A lawyer should consider before going after someone, is The FACTS. Sounds obvious right? What's obvious to some is foreign to others though . NOTHING is more important than having the facts on your side and speaking truthfully, especially to the court. As long as you're telling the truth the most expensive law degree or fancy titles can't take you down. Pandos isn't a public defender where he was obligated to take the Johnson Cadillac case. He can freely choose who he represents and who he chooses not to represent. This factor trumps all other factors because without the truth you're cooked. Who's been telling the truth in that case? And who's suddenly being RETRAUMATIZED?

Factor #2 for a lawyer to consider before going after someone is Ability. Filing all these documents is no easy task. So the lawyer would have to consider what one's ability to answer a complaint would be and whether or not they would be representing themselves. Considering the growth of computers and technology in the modern era, a competent lawyer would have to seriously consider that the person they target could figure things out and represent themselves. That misjudgement could be costly for the lawyer and for their client if their intentions were only to scare that person with a THREAT of court and NEVER intended to go there. Did things go as planned there and stay within budget so far?

Factor #3 for a lawyer to consider before going after someone is time. Time here has 2 parts. As we all know lawsuits are very time consuming and when one party drags their feet that timetable multiplies. So a lawyer would have to think about the total time a lawsuit could possibly take, whether THEY themselves have that time, and whether or not this amount of time is worth spending on this lawsuit.

The second part of time is more critical yet harder to judge. Does the person you are going after have the time available to handle such a lawsuit if they are going to represent themselves. Most people have very hectic schedules with work taking up a major part of their time. I'm gonna explain to you why that was a major miscalculation on your part and you'll see how it effects the big picture.

I can't say I have all the time in the world because I actually have limited time, but unfortunately for you, my time is free right now, to do with how I please.

I'm gonna show you why I have all this free time and how it relates to this situation.

Back in January 2024 I started having joint pain and over the course of that year I had my joints drained 4 times, was diagnosed with Lyme Disease, and by March of 2025 I had my third shoulder surgery. This took me out of work permanently. Before the summer was over my temporary disability ran out and I'd been denied permanent disability 3 times so far without a state medical examiner even seeing me once even though my doctor recommends I don't work anymore. I finally have a hearing scheduled with an administrative law judge in May but that might be too late. Hard to go a year without a paycheck, and on top of it my joints are killing me, my stomach is killing me, I can't work anymore and my shoulder doesn't function properly now. So even though my time is limited now it's all free to spend how I wish. I don't say this for sympathy. I say this so you can see what was behind that door you knocked on. You wanted to fight. My one arm doesn't work right anymore but the fight you wanted was on paper in the court so I don't need my arm for that. Let's go paper tiger.

Factor #4 for a lawyer to consider before going after someone is what kind of person that other person is they are going after. There's all kinds of people out there in the world and there are no shortage of people that are scared, timid, shy and would cower at the drop of a hat if threatened. There's some people out there that wouldn't back down and would stand their ground. And then there's an even smaller group of people that if you attack them they will go right back after you, and in this legal world if you don't have the FACTS and the TRUTH backing you up and you go after the wrong person, that could be very detrimental for you. You were warned if you actually read the website you used as your exhibit because it not only tells you I'm a nice guy.....a really nice guy. Until I'm not a nice guy. Then... I'm REALLY, REALLY NOT a nice guy anymore, it also tells you how I'm not like other people and if the scam hurts others I'm coming forward. Once I realized I could answer the complaint and file stuff myself you were in big trouble and you and Johnson Cadillac knew it.

Factor #5 a lawyer should consider before going after someone, is where that other person might be at in their life. Ever hear the saying a man with nothing has nothing to lose? I had ALOT of other things going on in my life prior to you

sending that cop over my house threatening to take my money, wages and property and punishing me to the fullest extent of the law. I don't have much, especially now, but once I realized I could expose that Johnson scam and help out other people, I'm all in with the rest of my chips. That's the difference between me and Mr. Pandos. Mr. Pandos brags on his website bio that he volunteers and finds time to help when he can, when in that case he was shown how the people of the area he serves were getting scammed and instead of investigating and possibly HELPING them out, he instead was lured by the almighty dollar.

Using all these factors does it look like Mr. Pandos had any type of checklist or process he followed before attacking me to make sure his claims were legitimate? or to protect himself? Even worse, does it look like Mr. Pandos did anything to help protect his client from the dire situation THEY are in? Knowing this, it's fair to ask not only how many people Mr. Pandos has threatened similarly to me with these types of letters and conduct but how many clients has he exposed because of his carelessness? These are all SERIOUS questions that need to be answered and considering I served him Discovery on 2/13 their responses are due 3/16 so we'll have to wait and see. I'm sure THIS will be ignored until after an appeal to so, God willing, I guess I'll see y'all in April after the Johnson appeal is done.

Thank you your honor

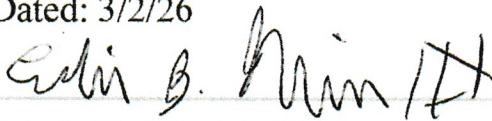
CERTIFICATION OF SERVICE

I, Edwin B. Minchin III, certify that on 3/2/26, I served a true copy of "Plaintiff's Supplemental Written Argument (Part Two) Regarding Defendants' Rule 4:6-2(e) Motion to Dismiss" upon counsel for Defendants by Certified mail and email

James F. Moscagiuri, Esq.
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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.

Dated: 3/2/26



Edwin B. Minchin III
Plaintiff, Pro Se

