

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

Civil Action

**DEFENDANTS' BRIEF IN SUPPORT OF THEIR
MOTION TO DISMISS THE COMPLAINT**

James F. Moscagiuri (029222001)

Lavery, Selvaggi, & Cohen

A Professional Corporation

1001 Route 517

Hackettstown, NJ 07840

(908) 852-2600

Attorneys for Defendants

Esq.,² and that they have been actively conspiring together against the Plaintiff. Id. at ¶ 21, Exhibit K.

24. Mr. Pandos is a recent victim of domestic violence, who has been terrorized by a former intimate partner in similar ways to what the Plaintiff has done to him here. Id. at ¶ 23, Exhibit L.

25. The experience of being stalked, defamed, publicly accused of sadistic falsehoods, and subjected to baseless litigation by the Plaintiff in this matter – *simply for doing his job and zealously advocating on behalf of his clients* – has been emotionally traumatizing to Mr. Pandos. Id. at ¶ 24.

MR. PANDOS' STATEMENTS BEFORE THE COURT

26. Mr. Pandos first learned of Plaintiff's correspondence with the College on November 5, 2025, when Plaintiff filed copies of his letters with the Court ahead of a motion hearing scheduled for the following day. Id. at ¶ 25, Exhibit M.

27. Mr. Pandos truthfully and accurately represented these facts to the Court at the motion hearing on November 6, 2025, as follows:

MR. PANDOS: Thank you, Judge. And, just for the record, I had no idea until I saw the defendants filing yesterday that he contacted my employer and tried to get me fired essentially, just for representing the plaintiff in this case.

[Id. at ¶ 26, Exhibit N at 16:19–23.]

² Plaintiff attempted to make his conspiracy theory even more fantastical by highlighting on his website that the College's corporate counsel, Douglas Steinhardt, Esq., separately serves in the capacity as State Senator. Id. at ¶ 21, Exhibit J.

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Civil Action

CERTIFICATION OF
WILLIAM H. PANDOS, ESQ.

William H. Pandos, Esq., of full age, hereby certifies as follows:

1. I am the Defendant in the above-captioned matter, and in that capacity, I am fully familiar with the facts and circumstances set forth herein.

2. I am an attorney-at-law of the State of New Jersey, and I ~~have been~~ ^{WAS} employed as an associate attorney by Defendant Lavery, Selvaggi & Cohen, P.C. ("LSC") since 2017.

THE JOHNSON LITIGATION

3. I am the attorney-of-record for the plaintiffs ("Johnson Plaintiffs") in a matter pending in the Superior Court of New Jersey, Warren County, Law Division, captioned Johnson GMC Cadillac, Inc., Christopher McDonald, Anne Eskow and Jason Palecco v. Edwin B. Minchin, III, et al., and proceeding under Docket No. WRN-L-000324-25 ("Johnson Litigation"). Attached hereto as **Exhibit A** is a true and accurate copy of the Verified Complaint filed in the Johnson Litigation.

4. In or about July Plaintiff Edwin B. Minchin, III ("Plaintiff"), registered the internet domain name badcadillac.com and created a website that appears to be full of vile, hateful, sexually abusive, and defamatory statements concerning the Johnson Plaintiffs. Attached hereto as **Exhibit B** is a true and accurate copy of Plaintiff's Counterclaim filed in the Johnson Litigation (see Ninth Counterclaim for Plaintiff's admission that he is the owner of badcadillac.com); attached hereto as **Exhibit C** is a true and accurate copy of content posted to Plaintiff's website badcadillac.com as of January 19, 2026.

5. In light of the horrific, and allegedly defamatory statements published to the Plaintiff's website, the Johnson Plaintiffs retained LSC to represent them.

6. On August 8, 2025, while acting on behalf of the Johnson Plaintiffs, I served the Plaintiff with a cease-and-desist letter, succinctly outlining the Johnson Plaintiffs' position that the statements on the Plaintiff's website are defamatory and have caused them to suffer harm. Attached hereto as **Exhibit D** is a true and accurate copy of the August 8, 2025, cease-and-desist.

7. Plaintiff failed to remove the allegedly defamatory content from his website.

8. On August 25, 2025, while acting on behalf of the Johnson Plaintiffs, I initiated the Johnson Litigation by filing an Order to Show Cause seeking preliminary injunctive relief and Verified Complaint against the Plaintiff in the Superior Court of New Jersey, Warren County, Law Division, for defamation, among other causes of action. See Exhibit A.

9. The Court denied without prejudice the Johnson Plaintiffs' Order to Show Cause seeking preliminary injunctive relief, ruling, "Matter to proceed in normal course." Attached hereto as **Exhibit E** is a true and accurate copy of Court Order dated August 27, 2025.

10. On August 27, 2025, while acting on behalf of the Johnson Plaintiffs, I served the Plaintiff with a further cease-and-desist letter concerning his recent distribution of business cards

at a local police department, urging local residents to visit his website. Attached hereto as **Exhibit F** is a true and accurate copy of the August 27, 2025, cease-and-desist.

11. The Johnson Litigation remains ongoing, and none of the Johnson Plaintiffs' causes of action have been adjudicated.

PLAINTIFF'S ONGOING INTIMIDATION AND HARASSMENT OF DEFENDANTS

12. After LSC filed the Johnson Litigation on behalf of their clients, the Plaintiff began a disturbing campaign of intimidation and harassment against LSC and against me, personally.

13. On August 29, 2025, Plaintiff seemingly posted a defamatory review of LSC to lawyers.com, falsely claiming that he was a client of LSC who had hired LSC attorney Lawrence P. Cohen, Esq. Attached hereto as **Exhibit G** is a true and accurate copy of a review posted to lawyers.com on August 29, 2025 (although the author's name is supposedly "Arrie", the author urges readers to view "[his] full, documented story" at badcadillac.com).

14. I personally conducted a diligent search of LSC's matter database, and there was no indication that Plaintiff has ever retained LSC or LSC attorney Lawrence P. Cohen, Esq.

15. In or about September 2025, I later learned that the Plaintiff stalked me to discover where I was employed outside of the legal practice.

16. On September 15, 2025, the Plaintiff weaponized this information and wrote a letter to my outside employer, Warren County Community College (the "College"), falsely accusing me of misconduct in the Johnson Litigation, and urging the College to reconsider my employment. Attached hereto as **Exhibit H** is a true and accurate copy of Plaintiff's letter to the College dated September 15, 2025.

17. I was not copied on this letter. See Exhibit G.

18. Unbeknownst to me, on September 18, 2025, the College's corporate counsel, Douglas J. Steinhardt, Esq., sent a cease-and-desist letter to the Plaintiff, advising him that Mr. my conduct was fully in compliance with the College's Employee Handbook, and warning Plaintiff to cease further communications with the College about me. Attached hereto as **Exhibit I** is a true and accurate copy of Douglas J. Steinhardt, Esq.'s letter to the Plaintiff dated September 18, 2025.

19. On September 22, 2025, Plaintiff and Mr. Steinhardt exchanged two further letters on the matter. Attached hereto as **Exhibit J** are true and accurate copies of Douglas J. Steinhardt, Esq.'s and Plaintiff's letters dated September 22, 2025.

20. I was not copied on either of these letters. See Exhibit I.

21. In turn, the Plaintiff used the College's cease-and-desist letter to fabricate the unhinged conspiracy theory that I am the illegitimate child of Douglas J. Steinhardt, Esq., and that we have been actively conspiring together against the Plaintiff. Attached hereto as **Exhibit K** is a true and accurate copy of a true and accurate copy of content posted to Plaintiff's website badcadillac.com as of January 19, 2026 (stating the disgusting falsehood that Douglas J. Steinhardt, Esq., is my father, and that we are engaged in some conspiracy together against the Plaintiff).

22. My father is William B. Pandos, not Douglas J. Steinhardt, Esq.

23. I am a recent victim of domestic violence, who has been terrorized by a former intimate partner in similar ways to what the Plaintiff has done to me here. Attached hereto as **Exhibit L** is a true and accurate copy of Final Restraining Order dated December 24, 2024.

24. Plaintiff's heinous conduct has not only caused me to suffer severe anxiety and emotional distress, but also, it has caused me to be retraumatized by the domestic violence perpetrated against me.

MY STATEMENTS BEFORE THE COURT

25. I first learned of Plaintiff's correspondence with the College on November 5, 2025, when Plaintiff filed copies of his letters with the Court ahead of a motion hearing scheduled for the following day. Attached hereto as **Exhibit M** is a true and accurate copy of the Plaintiff's correspondence filed with the Court on November 5, 2025.

26. At the motion hearing held on November 6, 2025, I truthfully and accurately represented these facts to the Court as follows:

MR. PANDOS: Thank you, Judge. And, just for the record, I had no idea until I saw the defendants filing yesterday that he contacted my employer and tried to get me fired essentially, just for representing the plaintiff in this case.

[Attached hereto as **Exhibit N** is a true and accurate copy of the certified transcript of the hearing held on November 6, 2026.]

27. Plaintiff alleges in his Complaint that I lied to the Court by stating at the motion hearing that he first learned of Plaintiff's letters to the College on November 6, 2025. However, the certified transcript of the motion hearing confirms that Plaintiff's recounting of events is false. Indeed, I truthfully represented that he first learned of Plaintiff's letter to the College on November 5, 2025, when Plaintiff filed a copy of same with the Court. See Exhibit M at 16:19–23.

28. Notwithstanding the veracity of my statement to the Court concerning when I first learned of the letters Plaintiff sent to my outside employer, this tangential statement was totally inconsequential to the outcome of the motion hearing. Plaintiff prevailed on the motion in every respect. Attached hereto as **Exhibit O** is a true and accurate copy of Court Order dated December 15, 2025 (denying the Johnson Plaintiffs' motion in its entirety).

Prevention of Domestic Violence Act

SOMERSET County, Superior Court, Chancery Division, Family Part

☐ Final Restraining Order (FRO)☒ Amended Final Restraining Order

Docket Number FV-18-000740-24		Plaintiff's Date of Birth [REDACTED]	Hispanic or Latino? ☐ Yes ☒ No	Defendant's Race WHITE	
In the Matter of Plaintiff PANDOS WILLIAM H		Defendant's Social Security Number XXX-XX-[REDACTED]	☐ Unknown	Defendant's Sex F	Eye Color BLUE
Defendant LANE KENZIE R				Hair Color BROWN	
Home Phone Number *****		Work Phone Number *****	Date of Birth [REDACTED]	Height 5 03	Weight 140
Home Address *** CONFIDENTIAL ***		Distinguishing Features (Scars, Facial Hair, Etc.) E/C: [REDACTED]			
Work Address *** CONFIDENTIAL ***		Driver's License Number			
		State		Driver's License Expiration Date	

The Court having considered plaintiff's Complaint dated 03/22/2024 seeking an ORDER under the Prevention of Domestic Violence Act, having established jurisdiction over the subject matter and the parties pursuant to N.J.S.A. 2C:25-17 et seq., and having found that defendant has committed an act of domestic violence, and all other statutory requirements having been satisfied:

It is on this 24 day of December 2024, ORDERED that:

Sought

Granted

Part I - Relief

DEFENDANT:

1. ☒ ☒ You are prohibited against future acts of domestic violence.
2. ☒ ☒ You are barred from the following locations:
☒ Residence(s) of Plaintiff ☒ Place(s) of employment of Plaintiff
☐ Other
3. ☒ ☒ You are prohibited from having any oral, written, personal, electronic, or other form of contact or communication with:
☒ Plaintiff
☐ Other(s) (List names & relationship to Plaintiff):
[REDACTED] (PLA'S WIFE)
4. ☒ ☒ You are prohibited from making or causing anyone else to make harassing communications to:
☒ Plaintiff
☒ Other(s) (Same as above or list names & relationship to Plaintiff):
SAME AS ABOVE
5. ☒ ☒ You are prohibited from stalking, following, or threatening to harm, to stalk or to follow:
☒ Plaintiff
☒ Other(s) (Same as above or list names & relationship to Plaintiff):
SAME AS ABOVE
6. ☐ ☐ You must pay emergent monetary relief (describe amount and method):
☐ Plaintiff: \$ _____ Effective: _____
☐ Dependents: \$ _____ Effective: _____
7. ☐ ☐ Other appropriate relief:
Defendant (including substance abuse, mental health or other evaluations and subsequent treatment):
8. ☐ ☐ Psychiatric evaluation:
9. ☐ ☐ Intake monitoring of conditions and restraints (specify):

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. Only a court can modify any of the terms or conditions of this court order.

☐ Final Restraining Order (FRO)☒ Amended Final Restraining Order

FV-18-000740-24

Sought Granted

Part I - Relief continued

DEFENDANT:10. ☒☒

PROHIBITIONS AGAINST POSSESSION OF WEAPONS: You are prohibited from possessing **any and all fire-arms or other weapons** and must immediately surrender these firearms, weapons, permits to carry, applications to purchase firearms and firearms purchaser ID card to the officer serving this court Order. Failure to do so can result in your arrest and incarceration.

Other Weapon(s) (describe) ANY AND ALL WEAPONS AND FIREARMS ID CARDS

PLAINTIFF:11. ☐☐

You are granted exclusive possession of (residence or alternate housing, list address only if specifically known to defendant):

12. ☐☐

Plaintiff is granted temporary custody of (specify name(s)):

13. ☐☐

Other appropriate relief:
Plaintiff (describe)

Child(ren) (describe)

LAW ENFORCEMENT OFFICER

You are to accompany to scene, residence, shared place of business, other (indicate address, time, duration & purpose):

☐☐

Plaintiff:

☐☐

Defendant:

WARRANT TO SEARCH FOR AND TO SEIZE WEAPONS FOR SAFEKEEPING☐

To any law enforcement officer having jurisdiction - this Order shall serve as a warrant to search for and seize any issued permit to carry a firearm, application to purchase a firearm and firearms purchaser identification card issued to the defendant and the following firearm(s) or weapon(s).

1. **You are hereby commanded to** search the premises for the above described weapons and/or permits to carry a firearm, application to purchase a firearm and firearms purchaser ID card and to serve a copy of this Order upon the person at the premises or location described as:
2. **You are hereby ordered** in the event you seize any of the above described weapons, to give a receipt for the property so seized to the person from whom they were taken or in whose possession they were found, or in the absence of such person to have a copy of this Order together with such receipt in or upon the said structure from which the property was taken.
3. **You are** to execute this Order immediately or as soon thereafter as is practicable.
☐ Anytime ☐ Other: _____
4. **You are further ordered**, after the execution of this Order, to promptly provide the Court with a written inventory of the property seized per this Order.

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence.
Only a court can modify any of the terms or conditions of this court order.

☐ Final Restraining Order (FRO)☒ Amended Final Restraining Order

FV-18-000740-24

Sought Granted

Part II - Relief

DEFENDANT:

1. ☐ ☐ You acknowledge parentage of: _____
2. ☐ ☐ You must submit to genetic testing: _____
3. ☐ ☐ No parenting time (visitation) until further order; _____
4. ☐ ☐ Parenting time (visitation) pursuant to (prior FV, FM, or FD Order) # _____ is suspended, a hearing is scheduled for: _____
5. ☒ ☒ Parenting time (visitation) is ordered as follows: (specify drop-off and pick-up times and locations, participation of or supervision by designated third party):
PER FD-18-490-24
6. ☐ ☐ Risk assessment ordered (specify by whom): _____ Return Date: _____
7. ☐ ☐ You must provide compensation as follows: (Appropriate notices have been attached as part of this Order):
- ☐ ☐ Emergent support - Plaintiff: \$ _____
- ☐ ☐ Emergent support - Dependent(s): \$ _____
- ☐ ☐ Interim support - Plaintiff: \$ _____
- ☐ ☐ Interim support - Dependent(s): \$ _____
- ☐ ☐ Ongoing Plaintiff support: \$ _____ Effective: _____
- ☐ ☐ Paid via income withholding through the: _____ Probation Div. _____
- ☐ ☐ Other: _____
- ☐ ☐ Ongoing child support: \$ _____ Effective: _____
- ☐ ☐ Paid via income withholding through the: _____ Probation Div. _____
- ☐ ☐ Other: _____
8. ☐ ☐ Medical coverage for plaintiff: _____
9. ☐ ☐ Medical coverage for dependent(s): _____
10. ☐ ☐ Compensatory damages to plaintiff: \$ _____
11. ☐ ☐ Punitive damages (describe): \$ _____
12. ☐ ☐ You must pay compensation to (specify third party and/or VCCO, and describe): _____
13. ☐ ☐ You must participate in a batterers' intervention program (specify): _____
14. ☐ ☐ You must make ☐ rent ☐ mortgage payments (specify amount(s) due date(s) and payment manner): _____
15. ☐ ☐ Defendant is granted temporary possession of the following personal property (describe): _____
16. ☐ ☐ Defendant is granted temporary custody of (specify name(s)): _____

FINGERPRINTING AND CIVIL PENALTY WERE ADDRESSED ON THE FINAL RESTRAINING ORDER

- ☒ You must submit to fingerprinting and other identification procedures as required by law pursuant to N.J.S.A. 53:1-15.
- ☐ You must pay a civil penalty of \$ _____ (\$50.00 to \$500.00 per N.J.S.A. 2C:25-29) to: _____ within _____ days. You will be charged a \$2.00 transaction fee for each payment or partial payment that you make.
- ☐ Waived due to extreme financial hardship because: _____

Sought Granted

PLAINTIFF:

17. ☐ ☐ Plaintiff is granted temporary possession of the following personal property (describe): _____

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. Only a court can modify any of the terms or conditions of this court order.

☐ Final Restraining Order (FRO)☒ Amended Final Restraining Order

FV-18-000740-24

Comments:

THE DEFENDANT WAS NOT PRESENT AT THE TIME THE FRO/AFRO WAS ISSUED ON 12/24/2024 THE FRO/AFRO WAS ISSUED BY DEFAULT. FURTHER ORDERED: DEF TO REPORT TO SOMERSET CTY. SHERIFF'S DEPARTMENT ON 11/15/24 TO BE FINGERPRINTED AND PHOTOGRAPHED. SEE ADDENDUM.

Addendum:

FURTHER ORDERED: PARTIES TO UTILIZE OUR FAMILY WIZARD APP IN THE EVENT OF A MEDICAL EMERGENCY FOR THE CHILD, ALL OTHER COMMUNICATION REGARDING THE CHILD SHALL BE DIRECTED TO THE PARENT COORDINATOR OR THE PLA'S ATTY. DEF IS PERMITTED TO ATTEND CHILD'S SCHOOL FUNCTIONS BUT MAY NOT HAVE ANY CONTACT WITH PLA OR HIS WIFE AND MAKE EVERY POSSIBLE ATTEMPT TO SIT SEPARATELY AND NOT PARK NEAR PLA'S VEHICLE. **AMENDED 12/24/24** REGARDING THE PLAINTIFF'S REQUEST FOR COMPENSATORY DAMAGES, THE COURT FINDS THAT COMPENSATORY DAMAGES IN THE AMOUNT OF \$44,429.71 IS REASONABLE FOR THIS MATTER REPRESENTING ATTORNEY FEES, EXPERT FEES, LOST WAGES, AND OTHER LITIGATION COSTS. IF THE PARTIES CANNOT AGREE ON A PAYMENT PLAN FOR THESE COSTS (COMMUNICATION BETWEEN PLAINTIFF'S ATTORNEY AND DEFENDANT), THE PLAINTIFF MAY FILE AN APPLICATION FOR THE COURT TO ADDRESS PAYMENT.

This Order is to become effective immediately and shall remain in effect until further Order of the Superior Court, Chancery Division, Family Part.

12/24/2024 03:37 PM

s/ DALYA F. YOUSSEF

Date

Honorable

**All Law Enforcement Officers Will Serve and Fully Enforce This Order.
The Plaintiff Shall Not Be Arrested for a Violation of This Restraining Order.**

- **This Final Restraining Order Was Issued After Defendant Was Provided with Notice and the Opportunity to Be Heard and Should Be Given Full Faith and Credit Pursuant to the Violence Against Women Act of 1991, Sec. 40221, Codified at 18 U.S.C.A. §2265(A) and §2266.**
- **If Ordered, Sufficient Grounds Have Been Found By This Court for the Search and Seizure of Firearms and Other Weapons as Indicated in This Court Order.**
- **Defendant Shall Not Be Permitted to Possess any Weapon, ID Card or Purchase Permit While This Order Is in Effect, or for Two Years, Whichever Is Greater.**

Notice to Plaintiff and Defendant

IMPORTANT: The parties cannot themselves change the terms of this Order on their own. This Order may only be changed or dismissed by the Family Court. The named defendant **cannot** have any contact with the plaintiff without permission of the court. If you wish to change the terms of this Order and/or you resume living together, you **must** appear before this court for a rehearing.

Notice to Defendant

A violation of any of the provisions listed in this Order or a failure to comply with the directive to surrender all weapons, firearm permits, application or identification cards may constitute criminal contempt pursuant to *N.J.S.A. 2C:29-9(b)*, and may also constitute violations of other state and federal laws which can result in your arrest and/or criminal prosecution. This may result in a jail sentence.

Return of Service

- ☒
- Plaintiff was given a copy of the Order by:

CHAVEZ VIA EMAIL CRISTIAN

Print Name

04:32 PM 12/24/2024

Time and Date

SOMERSET COUNTY FAMILY COURT

Signature / Badge Number / Department

- ☒
- I hereby certify that I served the within Order by delivering a copy to the defendant personally:

CHAVEZ VIA EMAIL CRISTIAN

Print Name

04:32 PM 12/24/2024

Time and Date

SOMERSET COUNTY FAMILY COURT

Signature / Badge Number / Department

- ☐
- I hereby certify that I served the within Order by use of substituted service as follows:

Print Name Time and Date Signature / Badge Number / Department

- ☐
- Defendant could not be served (explain):

Print Name Time and Date Signature / Badge Number / Department



The Courthouse is accessible to those with disabilities. Please notify the Court if you require assistance.



Distribution: Family Part, Plaintiff, Defendant, Sheriff, Other _____