

- The Motion for Modification or Termination of Child Support filed by the Defendant failed to comply with the provisions of Rule 5:5-4(a)(3) as the Defendant has failed to attach the prior Order sought to be modified. Additionally, he has failed to comply with Rule 5:5-4(a)(4) requiring a copy of his current Case Information Statement and a copy of the Case Information Statement previously filed at the time of the entry of the Order.
- The Court would also invoke the Equitable Doctrine of Unclean Hands based upon previous Orders entered by the Court in this matter. The application of that Doctrine is clearly within the discretion of the Court as the Defendant is guilty of bad faith, fraud and unconscionable actions related to the on-going litigation.

#### **SOCIAL SECUREITY ISSUES**

23. As late as October 31, 2023 the Defendant provided to the Court and Plaintiff's counsel a copy of Defendant's letter to the Social Security Administration dated October 31, 2023 and a letter from the Social Security Administration dated October 23, 2023 denying the Defendant's request to waive the collection of the overpayments made to him while he was collecting Social Security Disability. Prior Orders of this Court have addressed the overpayment issue to both the Plaintiff and the Defendant as a result of Mr. Hann work over the SGA while receiving disability benefits.
24. This Court does not have jurisdiction to resolve any of the issues pending before the Social Security Administration but in previous Orders has recommended the Plaintiff be treated as an "innocent spouse" as it relates to payments Plaintiff received during the