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November 25, 2025

VIA ELECTRONIC FILING & LREX

The Honorable Evelyn Padin, U.S.D.J.
United States District Court District of New Jersey
MLK Building & U.S. Courthouse
50 Walnut Street, Newark, NJ 07102

Re: Richard Zelma v. Aaron Ram, et. al.
Case No. 2:25-cv-15701-EP-JSA

Dear Judge Padin:

This firm represents Defendants in the above-mentioned matter. Defendants hereby request permission to file an F.R.C.P. 12(c) motion seeking the dismissal of the Complaint in this matter. In response to the Court's October 3, 2025 order, D.E. 14, Defendant submits this letter and enclosures.

As Defendants set forth in their October 14, 2025 correspondence to this Court, the basis of the Complaint rests on the allegations that Defendants violated the Telephone Consumer Protection Act (T.C.P.A.), 47 U.S.C. §§ 227(c) by calling Plaintiff twice on his residential phone line. Defendants concede that a call was made to Plaintiff however Plaintiff did not answer the call. Plaintiff attempted to manufacture this claim by returning the call to the identified phone number, speaking with Defendant Aaron Ram, misrepresenting to Mr. Ram that he was interested in selling his home, and providing a false phone number and name in an apparent attempt to solicit information from the Defendants in support of the claims made in this action. See Certification of Aaron Ram enclosed herein as Exhibit A. It is apparent by Plaintiff's action of returning the call to Mr. Ram and attempting to solicit facts from Mr. Ram in support of his claims, that Plaintiff targeted Defendants in furtherance of bringing these claims.

Respectfully submitted,

HATFIELD SCHWARTZ LAW GROUP LLC

By: /s/ Stefani C Schwartz

STEFANI C SCHWARTZ, ESQ.

cc: Richard Zelma, via ECF and email

Exhibit A

Stefani C Schwartz, Esq. (014661996)
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Attorneys for Defendants

RICHARD M. ZELMA,

Plaintiff,

v.

AARON L. RAM, INDIVIDUALLY; AND
D/B/A, RE/MAX AND ASSOCIATED
BRANDED OPERATIONS; AND REAL
ESTATE LIMITED, INC., D/B/A
RE/MAX OF ORADELL, AND
TELEMARKETER(S) CALLING FROM
GOOGLE NUMBERS, SPOOFED NUMBERS;
AUTODIALED NUMBERS AND DOES' (1-
10) AND ABC CORPORATIONS' (1-10);
EACH ACTING JOINTLY OR
SEPARATELY,

Defendants.

Civil Case No. 2:25-cv-
15701

Civil Action

**CERTIFICATION OF DEFENDANT
AARON RAM**

I, Aaron Ram, do hereby certify as follows:

1. I am a licensed real estate broker under RE/MAX Real Estate Limited ("RE/MAX").
2. On June 6, 2025, a call was made to Plaintiff. Plaintiff did not answer the call. A voicemail was not left by me.
3. On June 6, 2025, Plaintiff returned the call to me. When I answered the call, I identified myself as Aaron Ram, a local real estate broker with RE/MAX Real Estate. Plaintiff

informed me that his name was Paul Webber, that he owned two or three residential properties, and that he was interested in selling his home. He provided me with a fake phone number. He then, under this pretense, asked me a series of questions including my full name, contact information, and what platform I use to contact consumers.

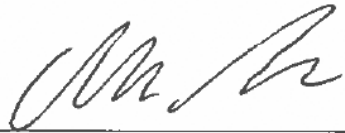
4. After asking me a series of questions, Plaintiff then stated to me that he was a "do not call vigilante".

5. Two days later on June 8, 2025, I then received correspondence from Plaintiff accusing me and RE/MAX of violating state and federal laws and demanding six thousand dollars (\$6,000.00).

I hereby certify that the foregoing statements are true to the best of my knowledge and recollection. I am aware that if the foregoing statements are knowingly false, that I am subject to punishment.

11/21/2025

Date:



Aaron Ram