No. 23-352

In The

Supreme Court Of The United States

CHRISTOPHER A. ROGALSKI,
Petitioner

vs.

LAUREATE EDUCTION, INC.,
Respondent

On Petition for A Writ of Certiorari
To the United States Court of Appeals for the Third Circuit

PETITION FOR REHEARING

Christopher A. Rogalski
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pro se

Statement Of Questions Presented

1. Did the U.S. Court of Appeals for the Third Circuit violate F.R.A.P. 4(a)(3) and exceed its jurisdiction by broadening the scope of the District Court's opinion and changing the *ratio* of that decision from a dismissal upon a finding of a forum selection clause which it expanded to a dismissal based upon the statute of limitations, absent a cross appeal?
(Suggested answer is in the affirmative. *El Paso Natural Gas Co. v. Neztsosie*, 526 U.S. 473 (1999))

2. Did the U.S. Court of Appeals for the Third Circuit violate F.R.A.P. 47(b) and the Fifth Amendment's guarantee of Due Process of Law and right to be heard when it changed the *ratio* of the District Court's decision on improper venue by neither requesting that petitioner brief the issue of the relevant New Jersey statute of limitations at issue, nor referencing petitioner's District Court brief on the issue, as referenced in his reply brief, before declaring that he "offers nothing on appeal to challenge" LEI's statute of limitations contentions on appeal?
(Suggested answer is in the affirmative. F.R.A.P. 47(b) and *Fed. Commc'n Comm'n v. Fox Television Stations, Inc.*, 567 U.S. 239, 132 S. Ct. 2307, 2317 (2012)

3. Did the U.S. Court of Appeals for the Third Circuit violate the Fifth Amendment's guarantee of Due Process of Law by issuing an opinion labeled "non-precedential" in contravention of "the province and duty of the judicial department to say what the law is", and therefore did not exercise, or exceeded, its Article III judicial power?
(Suggested answer is in the affirmative. *Marbury v. Madison*, 5 U.S. [1 Cranch.] 137 at 177 (1803)

Jurisdiction

A. Orders sought to be reviewed:
U.S. Court of Appeals for the Third Circuit:
Opinion and Judgment entered April 11, 2023, and Order denying certification to the New Jersey Supreme Court denied May 22, 2023
Motion for rehearing *en banc* filed April 25, 2023, denied May 19, 2023
Supreme Court of the United States:
Denial of Petition for *Certiorari*, December 11, 2023

B. Federal Subject Matter Jurisdiction
1. Jurisdiction in the District Court was based on Diversity Removal Jurisdiction, 28 U.S.C. §1446 by LEI.
2. Jurisdiction in the United States Court of Appeals was founded upon 28 U.S.C. §1291 to hear final decisions of district courts, from the District Court's September 30, 2022 Order of dismissal by a Notice of Appeal filed October 24, 2022
3. The United States Supreme Court has appellate jurisdiction over this matter pursuant to 28 U.S. Code § 1254, and The All Writs Act, 28 U.S.C. §1651.

Constitutions, Statutes, Treaties and Rules At Issue

U.S. Constitution
Article III, Section 1
The judicial Power of the United States, shall be vested in one supreme Court, and in such inferior Courts as the Congress may from time to time ordain and establish.

Fifth Amendment
No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of

Federal Rules of Appellate Procedure

Rule 4. Appeal as of Right—When Taken
(a) Appeal in a civil case…(3) Multiple Appeals. If one party timely files a notice of appeal, any other party may file a notice of appeal within 14 days after the date when the first notice was filed, or within the time otherwise prescribed by this Rule 4(a), whichever period ends later.

Rule 28.1 Cross-Appeals
…(e) Length...(1) Page Limitation. Unless it complies with Rule 28.1(e)(2), the appellant's principal brief must not exceed 30 pages; the appellee's principal and response brief, 35 pages; the appellant's response and reply brief, 30 pages; and the appellee's reply brief, 15 pages.

Rule 32. Form of Briefs, Appendices, and Other Papers
(a) Form of a Brief...(7) Length...(A) Page Limitation. A principal brief may not exceed 30 pages, or a reply brief 15 pages, unless it complies with Rule 32(a)(7)(B).

Rule 47 Local Rules by Courts of Appeals
...(b) Procedure When There Is No Controlling Law. A court of appeals may regulate practice in a particular case in any manner consistent with federal law, these rules, and local rules of the circuit. No sanction or other disadvantage may be imposed for noncompliance with any requirement not in federal law, federal rules, or the local circuit rules unless the alleged violator has been furnished in the particular case with actual notice of the requirement.

TABLE OF CITED AUTHORITY

Authority

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Constitutions:
Federal:
U.S. Constitution:

Statutes:
English:

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PETITION FOR REHEARING

Petitioner respectfully requests rehearing of this court's December 11, 2023 order denying a writ of *certiorari* to the United States Court of Appeals for the Third Circuit.

REASON THE WRIT SHOULD ISSUE

The writ should issue because:
1) The Third Circuit panel's opinion changed the *ratio* of the District Court's decision from a binding forum selection clause (FSC) to expiration of the statute of limitations (SOL) absent a cross-appeal, contrary to F.R.A.P. 4(a)(3) and *El Paso Natural Gas Co. v. Neztsosie*, 26 U.S. 4735 (1999),
2) failed to give Petitioner sufficient reply brief pages in violation of F.R.A.P. 28.1(e)(1) and F.R.A.P. 47(b), and
3) by declaring its unprecedented opinion is not precedential it exceeds its Article III powers, while it fails to "say what the law is".
All of this violates Due Process of Law.

ARGUMENT

1. The the U.S. Court of Appeals for the Third Circuit violated F.R.A.P. 4(a)(3) and exceeded its jurisdiction by, absent a cross appeal, broadening the scope of the District Court's opinion and changing the *ratio* of that decision from a dismissal upon a finding of a FSC which it expanded to a dismissal based upon the SOL. *El Paso, supra.*

Applying the holding in *El Paso* to this case, the Third Circuit took an opinion from the District Court which declared, using F.R.Civ.P. 12(b)(6), that the parties had agreed to a FSC which created proper jurisdiction only in the Netherlands, but decided none of Petitioner's claims, and then expanded that to a decision that the SOL had expired on all of Petitioner's claims on the merits. The District Court's opinion was limited to its finding of a FSC. (A F.R.Civ.P. 12(b)(6) motion must "be a context-specific task that requires the reviewing court to draw on its judicial experience and common sense", *Ashcroft v. Iqbal*, 556 U.S. 662, 679 (2009).) Before the Third Circuit's opinion, a foreign court might have decided the SOL issue on claims arising under New Jersey law on the merits, or even rejected the FSC and declined jurisdiction in favor of another forum. After the

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the appellate court includes the following: *E.F. Operating Corp. v. American Buildings*, 993 F.2d 1046, 1049 n. 1 (3d Cir.), cert. denied, 114 S.Ct. 193 (1993); *Francis v. Clark Equipment Co.*, 993 F.2d 545, 552-53 (6th Cir. 1993); *New Castle County v. Hartford Acc. Indem. Co.*, 933 F.2d 1162, 1206 (3d Cir. 1991); *Rollins v. Metropolitan Life Ins. Co.*, 912 F.2d 911, 917 (7th Cir. 1990); *Young Radiator Co. v. Celotex Corp.*, 881 F.2d 1408, 1415-17 (7th Cir. 1989); *Broth. of Maintenance Employees v. St. Johnsburg Lamoille*, 806 F.2d 14, 15-16 (2d Cir. 1986) (at least where no cross-appeal by any party); *Benson v. Armontrout*, 767 F.2d 454, 455 (8th Cir. 1985); *Savage v. Cache Valley Dairy Ass'n*, 737 F.2d 887, 888-89 (10th Cir. 1984); *Securities and Exchange Commission v. Youmans*, 729 F.2d 413, 415 (6th Cir. 1984) (citing *Morley*); *Martin v. Hamil*, 608 F.2d 725, 730-31 (7th Cir. 1979) (citing *Morley*); *Zapico v. Bucyrus-Erie Co.*, 579 F.2d 714, 725-26 (2d Cir. 1978); *Gomez v. Wilson*, 477 F.2d 411, 414 n. 10 (D.C. Cir. 1973); *Whitehead v. American Security and Trust Company*, 285 F.2d 282, 285-86 (D.C. Cir. 1960)." *Marts v. Hines*, 117 F.3d 1504, 1507 (5th Cir. 1997, Garwood, dissenting); *Granite Management Corp. v. United States*, 416 F.3d 1373, 1378-80 (Fed. Cir. 2005); *Radio Sys. Corp. v. Lalor*, 709 F.3d 1124, 1132 (Fed. Cir. 2013)

F.R.A.P. 4(a)(3) is jurisdictional, and not subject to exceptions as past precedent suggests.

2. The U.S. Court of Appeals for the Third Circuit violated the Fifth Amendment's guarantee of Due Process of Law and right to be heard when it changed the *ratio* of the District Court's decision on improper venue without either alerting petitioner that he was required to brief that in his reply brief, or permitting additional briefing to address the cross-appeal. It neither requested that Petitioner brief the issue of the relevant New Jersey statute of limitations at issue, nor referenced Petitioner's District Court brief on the issue, as referenced in his reply brief, before declaring that he "offers nothing on appeal to challenge" LEI's statute of limitations contentions on appeal. It cited no rules or precedents which put Petitioner on notice that he was required to address SOL contentions in an appeal about an alleged FSC, in violation of F.R.A.P. 47(b), and its conduct, which deprived Petitioner of his full right to be heard, is arbitrary and capricious. *Fed. Commc'n Comm'n v. Fox Television Stations, Inc.*, 567 U.S. 239, 253, 132 S. Ct. 2307, 2317 (2012)

The Third Circuit gave Petitioner no notice that he was required to brief SOL arguments in his reply brief. That violates, "A fundamental principle in our legal system...that laws which regulate persons or entities must give fair notice of conduct that is forbidden or required. ...This requirement of clarity in regulation is essential to the protections provided by the Due Process Clause of the Fifth Amendment. ... It requires the invalidation of laws that are impermissibly vague."

Third Circuit was obligated to grant your Petitioner either a longer or supplemental reply brief to address the cross-appeal since the appeal proceeded as a standard appeal and he lost 15 pages in his reply brief in the briefing schedule.[5] Furthermore, Petitioner noted in his reply brief below at pg. 14, "The Appellant briefed this matter in some detail below." The Third Circuit made no reference to that brief, holding at pg. 9, "Rogalski offers nothing on appeal to challenge the above assessment." (that the SOL had expired.) Furthermore, the Third Circuit declined to request a declaratory opinion on the educational law at issue from the New Jersey Supreme Court, as it cared not about getting the law it applied correct.

3. The U.S. Court of Appeals for the Third Circuit violated the Fifth Amendment's guarantee of Due Process of Law by issuing an opinion labeled "non-precedential" in contravention of "the province and duty of the judicial department to say what the law is", and therefore did not exercise, or exceeded, its Article III judicial power. *Marbury v. Madison*, 5 U.S. [1 Cranch.] 137 at 177 (1803)

Oliver Wendell Holmes, Jr., noted "The life of the law has not been logic; it has been experience."[6] That expe-

[5]In a cross-appeal, the page limit is 30 pages for the appellant's response and reply brief. F.R.A.P. 28.1(e)(1) Without the court having declared a cross-appeal, Petitioner's reply brief was limited to 15 pages by F.R.A.P. 32(a)(7)(A).

[6]Oliver W. Holmes, Jr., *Book Notices*, 14 Am. L Rev. 233-34 (1880) (reviewing Christoper Columbus Langdell, *A Selection Of Cases On The Law Of Contracts, With A Summary Of The Topics Covered By The Cases* (1880)).

commentary on those words, (2 Inst. 50,) says they mean due process of law." *Murray's Lessee v. Hoboken Land and Improvement Co.*, 59 U.S. 272, 276 (1855)

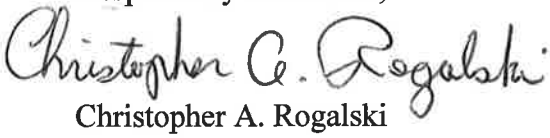
The American common law legal system is founded upon the judiciary expounding upon the law in its decisions. "It is true [a superior court] cannot institute a new enquiry concerning the fact, but it takes cognizance of it as it appears upon the record, and pronounces the law arising upon it." Publius (Hamilton), *Federalist* #81 [New York, May 28, 1788] The U.S. Constitution, which is the law of the land, requires that federal judges give lawful opinions and not just decide cases based upon their whims: "It is emphatically the province and duty of the judicial department to say what the law is". *Marbury v. Madison*, 5 U.S. [1 Cranch.] 137 at 177 (1803) "The Framers thought that, under the Constitution, judicial decisions would become binding precedents in subsequent cases...the Anti-Federalists also assumed that federal judicial decisions would become authorities in subsequent cases" *Anastasoff v. U.S.*, 223 F.3d 898, 902-3 (8th Cir. 2000) "We conclude therefore that, as the Framers intended, the doctrine of precedent limits the "judicial power" delegated to the courts in Article III." Id. at 903 (citing Justice Joseph Story's *Commentaries on the Constitution of the United States* §§ 377-78 (1833) "a departure from it would have been justly deemed an approach to tyranny and arbitrary power, to the exercise of mere discretion, and to the abandonment of all the just checks upon judicial authority." *Id.* at 904 "It is often said among judges that the volume of appeals is so high that it is simply unrealistic to ascribe precedential value to every decision. We do not have time to

supra, *New Castle County v. Hartford Acc. Indem. Co.*, *supra*, and this court, *El Paso*, *supra*, and denies Due Process of Law.

CONCLUSION

For the foregoing reasons the court should reverse the judgment of the U.S. Court of Appeals for the Third Circuit, and remand the matter.

Respectfully Submitted,



Christopher A. Rogalski
LL. M. (hons.) Liverpolis

APPENDIX

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NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 22-3004

CHRISTOPHER A. ROGALSKI,
Appellant
v.
LAUREATE EDUCATION, INC.;
LAUREATE ONLINE EDUCATION BV; and
THE UNIVERSITY OF LIVERPOOL

On Appeal from the United States District Court
for the District of New Jersey
(D.N.J. Civ. No. 1:20-cv-11747)
District Judge: Honorable Joseph H. Rodriguez

Submitted Pursuant to Third Circuit LAR 34.1(a)
April 6, 2023
Before: KRAUSE, PHIPPS, and SCIRICA, Circuit Judges
(Opinion filed: April 11, 2023)

OPINION*

PER CURIAM

* This disposition is not an opinion of the full Court and pursuant to I.O.P. 5.7 does not constitute binding precedent.

Case: 22-3004 Document: 28-3 Page: 2
Date Filed: 05/30/2023

Pro se appellant Christopher Rogalski appeals the District Court's decision granting a motion to dismiss his complaint

LEI removed the case under 28 U.S.C. § 1441(a), invoking the District Court's diversity jurisdiction under 28 U.S.C. § 1332(a). Soon after, LEI filed a Rule 12(b)(6) motion, attaching the Student Agreement as well as a document titled "Annex A General Term and Conditions" (the Code). The Code contained a forum selection clause (FSC) requiring that "any dispute arising from the Student Agreement or from this Code" be resolved in the Netherlands. Citing the FSC, LEI argued that Rogalski must litigate abroad. It argued in the alternative that Rogalski's claims were time-barred.

Rogalski did not opt to amend his pleading, as of right, in response. Instead, he argued in opposition to LEI's motion that he did not sign the Student Agreement and had never been presented with the Code, and that the FSC was otherwise unenforceable under New Jersey law. Rogalski also raised laches and estoppel arguments, among others. With respect to LEI's statute-of-limitations argument, Rogalski argued that he was entitled to later claim-accrual dates and to equitable tolling under New Jersey law.

The District Court agreed with LEI's position that the FSC is enforceable and that Rogalski was required to pursue his claims in the Netherlands. Based on that ruling, the District Court had no need to reach LEI's statute-of-limitations argument. The District Court granted LEI's motion by order entered September 30, 2022. This appeal followed.

II. Appellate Jurisdiction

Although the litigants say we have appellate jurisdiction, we cannot rest on their accord. See *Collinsgru v. Palmyra Bd. of Educ.*, 161 F.3d 225, 229 (3d Cir. 1998) ("Despite the agreement of both parties, we have an independent obligation to examine our jurisdiction to hear this appeal."), abrogated on other grounds by *Winkelman ex rel.*

Documents in Civil and Commercial Matters. The District Court did not respond to Rogalski's request. Because Rogalski does not clearly argue that (or how) the District Court erred with regard to service on LOE and the University, any such argument is forfeited. See *Barna v. Bd. of Sch. Dirs. of Panther Valley Sch. Dist.*, 877 F.3d 136, 145-46 (3d Cir. 2017).

Our standard of review is de novo. See *Newark Cab Ass'n v. City of Newark*, 901 F.3d 146, 151 (3d Cir. 2018). "When reviewing a district court's order on a Rule 12(b)(6) motion, we accept the factual allegations in the complaint as true, draw all reasonable inferences in favor of the plaintiff, and assess whether the complaint and the exhibits attached to it 'contain enough facts to state a claim to relief that is plausible on its face.'" *Watters v. Bd. of Sch. Dirs. of Scranton*, 975 F.3d 406, 412 (3d Cir. 2020) (citation omitted).3 In adjudicating motions to dismiss under Rule 12(b)(6), courts are permitted to consider "undisputedly authentic documents if the complainant's claims are based upon these documents." *Mayer v. Belichick*, 605 F.3d 223, 230 (3d Cir. 2010).

Accordingly, the background of this case, as we have described it above and elsewhere, has tracked Rogalski's plausibly pleaded factual allegations and the public record of the proceedings. Quotations were pulled from the complaint and its exhibits. See Fed. R. Civ. P. 10(c).

Additional quoted material is from the Code, which requires a brief explanation. Rogalski has at all times disputed that the nineteen-page Code produced by LEI and the one-page Student Agreement attached to the complaint are parts of

tains on appeal, see LEI Br. at 20-30, is sound and on its own required dismissal of Rogalski's complaint.

Courts may grant a Rule 12(b)(6) motion based on a statute-of-limitations defense when the untimeliness of the plaintiff's claim(s) is apparent on the face of the complaint. See *Schmidt v. Skolas*, 770 F.3d 241, 249 (3d Cir. 2014); *Robinson v. Johnson*, 313 F.3d 128, 135 (3d Cir. 2002). LEI argues based on the pleaded chronology that Rogalski's claims are time-barred under N.J.S.A. § 2A:14-1(a)—New Jersey's six-year statute of limitations for contract- and fraud-based claims. See *Stephens v. Clash*, 796 F.3d 281, 289 (3d Cir. 2015) ("[A] federal court must apply the substantive laws of its forum state in diversity actions, and these include state statutes of limitations.").5 We agree.

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4 The Code defines "the Parties" to it as the participating student (here, Rogalski) and LOE. There is no mention of LEI anywhere in the document.

5 LEI seeks to preserve an argument for a five-year limitations period under Dutch law. See, e.g., LEI Br. at 20 n.3. A shorter limitations period would not change the outcome.

In his complaint, Rogalski alleged that: LOE failed to credit several monthly tuition payments made between "July 2009" and "February 2012"; LOE added surprise surcharges for credit card payments "[s]tarting in August 2009"; LOE improperly increased the monthly tuition-payment amount "[o]n June 2, 2010" and again the following year; "[o]n March 30, 2012," LOE conditioned Rogalski's graduation on his

would be eligible to graduate "in July 2014." Appendix Volume II at 8. Rogalski relied on that allegation to argue in the District Court that he was tricked into thinking he would be receiving his degree, which is a basis for equitably tolling the limitations period. Cf. *Bustamante v. Borough of Paramus*, 994 A.2d 573, 588 (N.J. Super. Ct. App. Div. 2010) (explaining that equitable tolling applies if the plaintiff has been "induced or tricked by his adversary's misconduct into allowing the filing deadline to pass"). Assuming, arguendo, that the June 3, 2014 communication gave Rogalski sufficient pause about litigating over his entitlement to a degree, that aspect of his complaint may indeed be timely.6

But by Rogalski's own admissions, a separate basis for dismissal exists: mootness. See JA Vol. II at 22 (Sept. 2, 2022 letter from Rogalski to the District Court) (explaining that because the University "indicates that it conferred my LL. M.," "the specific performance requested in Count 3 of the complaint is now moot"); Reply Br. at 2 ("Appellant finally received his LL. M. in International Business Law with distinction from [the University] after filing this appeal. Consequently, some relief sought in the complaint is now moot, i.e., specific performance, (Count 3) and unjust enrichment (Count 5)."); Reply Br. at 11 ("[S]ince [the] degree has been awarded, the only remaining issues are financial."). To be sure, the June 3, 2014 communication is irrelevant to

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6 Rogalski averred in a sworn affidavit attached to his opposition to LEI's motion to dismiss that he "delayed bringing this action in an American court until such time as LOE, and its parent company had clearly abandoned attempts to bring suit [against Rogalski in the Netherlands]." JA Vol. III at 37. As we are reviewing an order granting dismissal under Rule 12(b)(6), we have not been influenced by Rogalski's affidavit.

7 Equally errant is Rogalski's reliance on *Kreider Dairy Farms, Inc. v. Glickman*, 190 F.3d 113, 118 (3d Cir. 1999), where we considered "an exception to the general finality

existing record. See *Watters*, 975 F.3d at 412; see also *Shark River Cleanup Coal. v. Twp. of Wall*, 47 F.4th 126, 136 (3d Cir. 2022) (affirming dismissal on "alternative ground" even though "it was not reached by the District Court"); *Cent. Pa. Teamsters Pension Fund v. McCormick Dray Line, Inc.*, 85 F.3d 1098, 1107 (3d Cir. 1996) (recognizing that "we may affirm a correct decision of the district court on grounds other than those relied upon by the district court").

For all of the reasons outlined above, we will affirm the District Court's order dismissing the complaint.8

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rule for certain District Court orders remanding for further administrative proceedings."

8 Rogalski's argument that the District Court should not have directed him to file a statement pursuant to Local Civil Rule 7.1.1 (pertaining to disclosure of third-party litigation-funders), may be correct. But his larger critique of the District Judge's handling of this case presents neither a viable due process claim nor a basis to do anything in this appeal other than affirm.

Case: 22-3004 Document: 26 Page: 1
Date Filed: 05/19/2023

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 22-3004

CHRISTOPHER A. ROGALSKI,
Appellant

v.

LAUREATE EDUCATION, INC.;
LAUREATE ONLINE EDUCATION BV;
THE UNIVERSITY OF LIVERPOOL

(D.C.N.J. No. 1-20-cv-11747)

SUR PETITION FOR REHEARING

Present: CHAGARES, Chief Judge, JORDAN, HARDIMAN, GREENAWAY, JR., SHWARTZ, KRAUSE, RESTREPO, BIBAS, PORTER, MATEY, PHIPPS, FREEMAN, MONTGOMERY-REEVES, CHUNG, and SCIRICA* Circuit Judges

The petition for rehearing filed by Appellant Christopher Rogalski in the above-entitled case having been submitted to the judges who participated in the decision of thisCourt and to all the other available circuit judges of the circuit in regular active service, and no judge who concurred in the decision having asked for rehearing, and a majority of

*Judge Scirica's Vote is Limited to Panel Rehearing Only.

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Date Filed: 05/19/2023

IN THE UNITED STATES SUPREME COURT

CHRISTOPHER A. ROGALSKI, **Petitioner,**	:	
V.	:	**Docket No. 23-352**
LAUREATE EDUCATION, INC., **Respondent**	:	

CERITIFICATE OF COMPLIANCE

I hereby certify that my "Petition for Rehearing" to the United States Supreme Court complies with the word limits of U.S. Supreme Court Rule 33.1, and it contains 2994 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

In compliance with 28 U. S. C. § 1746, I certify under penalty of perjury that the foregoing is true and correct. Executed on January 3, 2024.

Christopher A. Rogalski

Christopher, A. Rogalski

cc: Martin J. McAndrew, Esq.

IN THE UNITED STATES SUPREME COURT

CHRISTOPHER A. ROGALSKI, **Petitioner,**	:	
V.	:	**Docket No. 23-352**
LAUREATE EDUCATION, INC., **Respondent**	:	

CERITIFICATE OF SERVICE

I hereby certify that all parties required to have been served, have been served. Three true and accurate copies of Petitioner's "Petition for Rehearing",were mailed by U.S. mail this 4th day of January, 2024 to the following by regular First Class mail, postage pre-paid:

Martin J. McAndrew, Esq.
O'Connor Kimball, LLP
Suite 330
51 Haddonfield Rd
Cherry Hill, NJ 08002

Christopher A. Rogalski

Christopher, A. Rogalski