

## BROMBERG LAW LLC

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October 29, 2021

## VIA ELECTRONIC FILING

Hon. Zahid N. Quraishi, U.S.D.J.  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Court Room 7W  
Trenton, NJ 08608

**RE: Conforti v. Hanlon, Case 3:20-cv-08267-ZNQ -TJB**  
**Joint Letter Re: Pending Dispositive Motions**

Dear Judge Quraishi:

This firm represents the Plaintiffs in the above-captioned matter. On October 22, 2021, via Text Order, Your Honor requested that the parties confer and file a joint letter specifying the pending dispositive motions currently before the Court, and the briefs associated with those motions. After conferring with all parties that have motions currently pending, the parties hereby submit this Joint Letter. The below table sets forth same.

	Party	County Clerk	Role	Motion ECF #	Moving Br. ECF #	Grounds (Rule 12)	Reply Br. ECF#
1	Edward P. McGettigan	Atlantic	D	N/A <sup>1</sup>	63	(b)(6)	94
2	John S. Hogan	Bergen	D	60	60-1	(b)(1), (6)	92
3	E. Junior Maldonado	Hudson	D	57	57-3	(b)(6)	93
4	Paula Sollami Covello	Mercer	D	58	58-1	(b)(6)	96
5	Christine Giordano Hanlon	Monmouth	D	59	59-2	(b)(6)	87
6	Scott M. Colabella	Ocean	D	55	55-1	(b)(1), (6)	91
7	State of NJ	N/A	I	53	53-1	(b)(1), (6)	89
8	James Hogan	Gloucester	Unclear	N/A	Withdrawn <sup>2</sup>	N/A	N/A

As set forth in the above chart, the only motions pending before the Court at this time are the seven motions to dismiss, consisting of one filed by each of the six Defendants, as well as one

<sup>1</sup> The Atlantic County Clerk filed a Brief and Proposed Order, but no Notice of Motion.

<sup>2</sup> The Gloucester County Clerk has confirmed that he has withdrawn from participating in this round of motions. See ECF 106. Despite Your Honor's instruction during the July 15, 2021 court teleconference to specify whether he seeks to participate in this action, going forward, as an Intervenor or an *amicus*, the Gloucester Clerk has not clarified his preference.

filed by Intervenor, the State of New Jersey. It should be noted that the Plaintiffs<sup>3</sup> filed an omnibus Opposition Brief (ECF 69) in opposition to all the above-listed motions to dismiss.

The League of Women Voters of New Jersey and Salvation and Social Justice filed a Brief of *Amici Curiae* (ECF 72) in opposition to all seven pending motions to dismiss. On October 22, 2021, the Court entered a text order (ECF 108) granting the motion for *amici* to appear (ECF 70), consistent with the consent order (ECF 80).

The six Defendants and the State of New Jersey's Reply Briefs (ECF Nos. are listed in the above chart) were prepared in omnibus fashion to address both the Opposition Brief of the Plaintiffs as well as the Brief of *Amici Curiae*.

Thank you for the Court's consideration of this matter.

Respectfully submitted,

/s/ Brett M. Pugach  
Brett M. Pugach, Esq.  
BROMBERG LAW LLC

*Counsel for Plaintiffs*

The undersigned hereby agree to the form and substance of this Joint Letter:

**BROMBERG LAW LLC**  
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*Attorneys for Defendant*  
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Dated: October 29, 2021

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<sup>3</sup> The Plaintiffs in this action are: Christine Conforti, Arati Kreibich, Mico Lucide, Joseph Marchica, Kevin McMillan, Zinovia Spezakis, and New Jersey Working Families Alliance.

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Dated: October 29, 2021

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Dated: October 29, 2021

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Dated October 29, 2021

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Dated October 29, 2021

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Dated: October 29, 2021

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Dated: October 29, 2021

**NEW JERSEY INSTITUTE FOR SOCIAL  
JUSTICE**

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CC. All Counsel of Record (via electronic filing)

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