

**BROWN & CONNERY, LLP**  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as  
a candidate for U.S. Senate, et al.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON,  
in her official capacity as Monmouth  
County Clerk, et al.,

Defendants.

Case No.: 3:24-cv-01098-ZNQ-TJB

**NOTICE OF MOTION FOR  
PARTIAL SUMMARY  
JUDGMENT**

**TO: Clerk, United States District Court**  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

Honorable Zahid N. Quraishi, U.S.D.J.  
**United States District Court**  
**District of New Jersey**  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Court Room 4W

Trenton, New Jersey 08608

**ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that Intervenor, Camden County Democratic Committee (“CCDC”), by and through its counsel, Brown & Connery, LLP, shall move for an order granting its Motion for Partial Summary Judgment and dismissing Plaintiffs’ claim for an award of attorneys’ fees and costs from Intervenor CCDC.

**PLEASE TAKE FURTHER NOTICE** that Camden County Democratic Committee shall rely upon the accompanying Statement of Undisputed Material Facts in Support of its Motion, Brief in Support of its Motion, and Certification of Counsel. A proposed form of Order is also submitted herewith. Oral argument is requested if opposition is filed.

Respectfully submitted,

**BROWN & CONNERY, LLP**  
*Attorneys for Intervenor, Camden  
County Democratic Committee*

Dated: February 21, 2025

*s/William M. Tambussi*  
William M. Tambussi