

ARCHER & GREINER, P.C.

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Attorneys for Plaintiff Republican National Committee, Inc.

REPUBLICAN NATIONAL COMMITTEE,
 INC.,

Plaintiff,

v.

STATE OF NEW JERSEY, DEPARTMENT
 OF STATE, DIVISION OF ELECTIONS,

Defendant.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION: MERCER COUNTY

Docket No.: MER-L- 1499-25

Civil Action

**ORDER TO SHOW CAUSE
 (OPRA SUMMARY PROCEEDING)**

THIS MATTER having been opened to the Court by Archer & Greiner, P.C. and the Dhillon Law Group Inc., attorneys for Plaintiff Republican National Committee, Inc., seeking relief by way of summary action pursuant to R. 4:67-1 and 2(a), based upon the facts set forth in the verified complaint and supporting papers filed herewith; and the Court having determined that this matter may be commenced by order to show cause as a summary proceeding pursuant to *N.J.S.A. 47:1A-6*; and for good cause shown,

1. **IT IS** on this 18th day of July 2025, **ORDERED** that Defendant State of New Jersey, Department of State, Division of Elections, appear ^{REMOTELY*} and show cause on the 11th day of September, 2025 before the Honorable Robert Lougy, A.J.S.C, Superior Court of New Jersey, County of Mercer, Mercer County Civil Courthouse, 175 South Broad Street, Trenton,

All proceedings in this matter shall be remote via TEAMS, with instructions and invitations to issue closer to the date of event.

New Jersey, 08650, at a time to be determined, or as soon thereafter as counsel can be heard, why judgment should not be entered:

- A. Ordering Defendant to disclose to Plaintiff copies of the following records: (1) aside from those documents Defendant has already provided, those documents requested in Plaintiff's March 25, 2025, records request, which was incorporated in Plaintiff's July 3, 2025, records request; (2) copies of all seal audit logs for voting machines deployed by each county in the State of New Jersey in connection with the June 10, 2025, Primary Election and the associated early voting period;
- B. Ordering that Defendant unlawfully denied access to the foregoing records requested by Plaintiff on March 25, 2025, June 3, 2025, and July 3, 2025, by failing to provide access to the same within the timeframe prescribed by *N.J.S.A.* 47:1A-5(i)(1);
- C. Ordering that within three (3) days of providing the foregoing records, Defendant shall submit a certification with the Court that it has provided all responsive records;
- D. Ordering that any fee that Defendant may have charged for producing the foregoing records is waived;
- E. Ordering such other, further and different relief as the Court may deem equitable and just.

And it is further **ORDERED** that:

2. A copy of this order to show cause, verified complaint, and all supporting affidavits or certifications submitted in support of this application, be served upon Defendant

within 7 days of the date hereof via overnight delivery with signature confirmation or certified mail, return receipt requested.

3. Plaintiff must file with the Court proof of service of the pleadings on the Defendant no later than three (3) days before the return date.

4. Defendant shall file and serve a written answer and opposition papers to this order to show cause and the relief requested in the verified complaint and proof of service of the same by August 21, 2025. The answer and opposition papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the papers must be sent directly to the chambers of the Honorable Robert Lougy, A.J.S.C.

5. Plaintiff must file and serve any written reply to Defendant's opposition to the order to show cause by September 2, 2025. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of the Honorable Robert Lougy, A.J.S.C.

6. If Defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that Plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

7. If Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date must be submitted to the Court no later than three (3) days before the return date.

8. Defendant take notice that Plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis

of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer and opposition papers and proof of service before the return date of the order to show cause.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at njcourts.gov. ~~Unless exempt from paying the filing fee, include a \$175 filing fee payable to the "Treasurer, State of New Jersey."~~ You must also send a copy of your answer and opposition papers to Plaintiff's attorney whose name and address appear above, or to Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your answer and opposition papers (with the fee) or judgment may be entered against you by default.

~~9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at njcourts.gov.~~

10. The Court will entertain argument, but not testimony, on the return date of the order to show cause, unless the Court and parties are advised to the contrary no later than 7 days before the return date.



ROBERT LOUGY, A.J.S.C.