

FILED

MAR 03 2026

CAROL NOVEY CARUBINO, JUDGE

**CONTARINO ROTH LLC**  
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*Attorneys for Plaintiff*  
*Republican National Committee*

REPUBLICAN NATIONAL COMMITTEE,  
  
Plaintiff,  
  
v.  
  
BERGEN COUNTY BOARD OF  
ELECTIONS,  
  
Defendant.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

Docket No.: BER-L-2599-26

Civil Action

**ORDER TO SHOW CAUSE**

**(OPRA SUMMARY PROCEEDING)**

THIS MATTER having been opened to the Court by Contarino Roth LLC, attorneys for Plaintiff Republican National Committee, Inc., seeking relief by way of summary action pursuant to Rule 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 3<sup>rd</sup> day of March 2026, **ORDERED** that Defendant Bergen County Board of Elections, appear and show cause on the 27<sup>th</sup> day of March 2026 before the Honorable Carol V. Novoy Carubino Superior Court of New Jersey, County of Bergen, Bergen County Justice Center, 10 Main Street Hackensack, New Jersey 07601, 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 provide Plaintiff copies of the following records: (1) the list of poll workers assigned to each early voting site in the county, including political party affiliation of the assigned workers and any vacancies that existed, during the early voting period for the November 4, 2025 General Election; and (2) the list of poll workers assigned to each voting district in the county, including political party affiliation of the assigned workers and any vacancies that existed, for the November 4, 2025 General Election;
- B. Declaring that Defendant violated OPRA by unlawfully denying access to the foregoing records requested by Plaintiff on November 25, 2025;
- C. Ordering that within three 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 that Plaintiff is a prevailing party in this matter and entitled to an award of reasonable counsel fees and costs; and
- F. 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 seven days of the date hereof via overnight delivery with signature confirmation or certified mail, return receipt requested and email at [elections@bergencountynj.gov](mailto:elections@bergencountynj.gov).

3. Plaintiff must file with the Court proof of service of the pleadings on the Defendant no later than three 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 March 19<sup>th</sup>. 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 Carol V. Novey Catuogno, A.J.S.C.

5. Plaintiff must file and serve any written reply to Defendant's opposition to the order to show cause by March 23<sup>rd</sup>. 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 Carol V. Novey Catuogno, 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 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 seven days before the return date.

Hon.



CAROL NOVEY CATUOGNO, A.J.S.C.