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September 8, 2021

Via e-courts filing

Hon. Robert C. Wilson, J.S.C.
Bergen County Justice Center
10 Main Street, Room 215
Hackensack, NJ 07601

Re: Lacey, et al. v. Ruccione, et al.
Docket No. BER-L-5526-21
Our File No. T1210-001

Dear Judge Wilson:

This Firm serves as Township attorney for the Township of Teaneck and represents Douglas Ruccione ("Clerk Ruccione"), the Clerk of the Township of Teaneck, in the above-captioned matter. Please accept this letter as Defendant's request to submit a sur-reply to Plaintiff's reply brief that was filed with the court on September 6, 2021.

In the interest of judicial economy and to avoid unnecessary delays following the oral argument that is scheduled for Monday, September 13, 2021 at 10:00 a.m., Defendant respectfully requests to submit a sur-reply to Plaintiff's reply brief. Within Plaintiff's reply, Plaintiff for the first time, raised an issue regarding the Manchester Township Ordinance. Said issue is likely to be discussed at the scheduled hearing, thus Defendant seeks leave to file with the court a short (3 page or less) sur-reply on that topic.

We thank Your Honor for his attention to this matter.

Respectfully submitted,

/s/ John L. Shahdanian II, Esq.
John L. Shahdanian II, Esq.

cc: Scott D. Salmon, Esq.
Renee Steinhagen, Esq.