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State of New Jersey – Executive Branch
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IN RE COMPLAINT FILED BY THE FRANKLIN TOWNSHIP BOARD OF EDUCATION REGARDING P.L. 2020, CHAPTER 44	:	STATE OF NEW JERSEY
	:	COUNCIL ON LOCAL MANDATES
	:	
	:	CONSOLIDATED DOCKET NOS.:
	:	
	:	COLM-1-21
	:	COLM-1-21A
	:	COLM-1-21B
	:	
IN RE COMPLAINT FILED BY THE LOWER TOWNSHIP ELEMENTARY BOARD OF EDUCATION REGARDING P.L. 2020, CHAPTER 44	:	RESPONSE TO COMPLAINANTS'
	:	STATEMENT OF UNDISPUTED
	:	MATERIAL FACTS IN SUPPORT
	:	OF MOTION FOR SUMMARY
	:	JUDGMENT
	:	
IN RE COMPLAINT FILED BY THE GLOUCESTER CITY BOARD OF EDUCATION REGARDING P.L. 2020, CHAPTER 44	:	
	:	
	:	

Respondent, the Executive Branch of the State of New Jersey, by way of a response to Complainants' Statement of Undisputed Material Facts in Support of their Motion for Summary Judgment, states:

1. It is admitted that L. 2020, c. 44 ("Chapter 44") requires school district employee contribution rates toward health insurance benefits to be based on a percentage of salary model

(with caps) when they are enrolled in the New Jersey Educators Health Plan or the Garden State Health Plan.

2. Admitted.

3. Admitted.

4. Denied as stated. The quoted language is from a preliminary draft of an exhibit, "Plan Year 2019 Employee Contribution Schedule for Plan C-1," which, upon information and belief, was prepared by Milliman for the New Jersey Senate Majority Office.

5. Chapter 44, as amended, speaks for itself and therefore no response is required. To the extent that a response is required, denied as stated.

6. Denied.

7. The quoted language is neither admitted nor denied, as Chapter 44 speaks for itself. The remainder of this paragraph is admitted.

8. This is a legal conclusion and no response is required, as Chapter 44 speaks for itself.

9. This is a legal conclusion and no response is required, as Chapter 44 speaks for itself.

10. Denied.

11. Denied.

12. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

13. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

14. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

15. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

16. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

17. Denied as stated.

18. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

19. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

20. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

21. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

22. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

23. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

24. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

25. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

26. Denied as stated.

27. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

28. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

29. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

30. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

31. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

32. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

33. Denied as stated.

34. Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

35. The documents attached as Exhibit D at EXEC003 speak for themselves, and no response is required. To the extent a response is required, Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

36. The documents attached as Exhibit D at EXEC003 speak for themselves, and no response is required. To the extent a response

is required, Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

37. The documents attached as Exhibit D at EXEC008 speak for themselves, and no response is required. To the extent a response is required, Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

38. The documents attached as Exhibit D at EXEC013 speak for themselves, and no response is required. To the extent a response is required, Respondent is without sufficient information to admit or deny these statements, and Claimants are left to their proofs.

39. The quoted language is neither admitted nor denied, as Chapter 44 speaks for itself, and no response is required.

40. The quoted language is neither admitted nor denied, and no response is required, as Chapter 44 speaks for itself.

41. Admitted.

42. The documents at EXEC015 and Exhibit E speak for themselves, and no response is required. To the extent a response is required, denied as stated.

ANDREW J. BRUCK
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Jaclyn M. Frey
Jaclyn M. Frey
Amna T. Toor
Christopher Weber
Deputy Attorneys General

Dated: October 29, 2021