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October 29, 2021

Via Email

Hon. John A. Sweeney, A.J.S.C. (Ret.), Chairman
New Jersey Council on Local Mandates
140 East Front Street, 8th Floor
Trenton, New Jersey 08625
filings-clmand@treas.state.nj.us

**Re: In the Matter of the Complaints filed by the Franklin Township Board of Education,
Lower Township Elementary Board of Education and Gloucester City Board of Education**

Docket Nos. COLM-0001-21, COLM-0001-21-A, COLM-0001- 21-B

Dear Judge Sweeney:

This firm represents *Amicus Curiae* the New Jersey Education Association in the above-captioned matter. In support of Respondent Executive Branch's Motion for Summary Judgment in the above matter, enclosed please find the Certification of Richard A. Friedman, Esq., and Stacey Salerno which address the status of negotiations in the petitioning districts.

Amicus Curiae herewith adopts and incorporates the legal and factual arguments set forth in Respondent's Brief in Support of its Motion to Dismiss. In addition, *Amicus Curiae* further relies upon the legal arguments previously submitted in its initial brief, filed with the Council on May 20, 2021.

Respectfully Submitted,

Richard A. Friedman

Richard A. Friedman

RF/mw
Encl.

cc: Shawn Slaughter, Executive Director Council on Local Mandates (via email only)
Jaclyn Frey, DAG (via email only)
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