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January 25, 2019

VIA ECF AND REGULAR MAIL

Hon. Madeline Cox Arleo, U.S.D.J.
M.L. King Jr. Federal Building & U.S. Courthouse
50 Walnut Street, Room 2060
Newark, NJ 07102

Re: KENWORTHY v. LYNDHURST POLICE DEPARTMENT, et al
Docket No. 2:18-cv-12822-MCA-JAD

Dear Judge Arleo:

This firm represents Defendants Robert Martin, Ann Martin, Richard Anderson and Lauren Anderson in the above-referenced action.

We have received the January 23 letter of Harry D. Norton, Jr., Esq., (ECF No.31) and the January 25, 2019 letter of Christopher J. Turino, Esq. (ECF No. 32) in response to Plaintiff's purported application to file an Amended Complaint (ECF No. 30).

We join in Mr. Norton's and Mr. Turano's observations and contentions as expressed in the above-referenced letters. I add that it is apparent that Plaintiff is abusing the judicial process in taking a variety of courses in a desperate effort to maintain a foothold in this Court.

For the reasons stated in the letters of Mr. Norton and Mr. Turano, it is respectfully submitted that your Honor should reject and disregard Plaintiff's purported application to file an Amended Complaint or, in the alternative, render guidance to counsel as to how this matter is to proceed.

HARWOOD LLOYD, LLC
COUNSELLORS AT LAW

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Thanking your Honor for the Court's attention to this matter, I am

Respectfully yours

GJI/dr


GREGORY J. IRWIN

cc: Plaintiff Lee Kenworthy, pro se (by certified and regular mail and e-mail)
All counsel of record (via ECF)