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January 15, 2019

Honorable Madeline Cox-Arleo, U.S.M.J.
District Court of New Jersey, Newark
Martin Luther King Building &
U.S Courthouse
50 Walnut Street, Room 4015
Newark, New Jersey 07101

RE: Kenworthy vs. Lyndhurst Police Department, et als.
Case No.: 2:18-cv-12822-MCA-JAD
Our File No.: H17BR-007-HDN

Dear Judge Cox-Arleo:


As you are aware, we represent the Township of Lyndhurst with respect to the captioned matter. We have filed a Notice of Motion in lieu of filing an Answer seeking the dismissal of the plaintiff's Complaint.

We have now received from the plaintiff a Motion for Continuance which will be decided by the Court on February 4, 2019. We would join in any other objection to this particular request by the plaintiff and additionally would state that our client is prejudiced by having this matter hanging over its head for such an extended period of time. Additionally, we would note that the plaintiff commenced his suit as a Pro Se Litigant and now he wishes to have a continuance on the theory that there may be some attorney who might take his case over the next thirty to sixty days.

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In all due respect to the plaintiff, it is our opinion that this merely delays the inevitable with respect to the Motions that are filed. Kindly allow this to act as our Opposition to the plaintiff's request.

Very truly yours,



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cc: Mr. Lee Kenworthy – CMRR & US Mail
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