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February 5, 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 the Court is aware, we represent the defendants, Lyndhurst Police Department, Police Officer Phillip Reina, Police Officer Haggerty, Sgt. Richard Pizzuti, Lyndhurst Township Ambulance Squad, and the Township of Lyndhurst. Plaintiff has filed a Motion for Leave to File an Amended Complaint. Our office had previously filed correspondence dated January 23, 2019, seeking guidance from the Court as to how to address this Motion, which was not filed with leave of the Court.

In lieu of a more formal Brief, please accept this correspondence as opposition to the plaintiff's Motion. We oppose the Motion for the reasons set forth in the Brief and Certification of Counsel filed on behalf of defendants Robert Martin, Ann Martin, Richard Anderson, and Lauren Anderson.

For the reasons set forth in co-defendants' papers, it is submitted that the Motion to Amend be denied.

Hon. Madeline Cox Arleo, U.S.D.J.

Re: Kenworthy v. Lyndhurst Police Dept., et al. (2:18-cv-12822-MCA-JAD)

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Please do not hesitate to contact the undersigned if the Court requires any further information prior to the return date of the Motion.

Very truly yours,



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