



State of New Jersey

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October 26, 2011

The Hon. Mary C. Jacobson, P.J.Ch.
Mercer County Civil Courts Bldg.
175 South Broad Street
PO Box 8068
Trenton, New Jersey 08625

VIA HAND-DELIVERY

AND EMAIL to: valentine.dipippo@judiciary.state.nj.us

Re: Occupy Trenton, et al. v. Raymond L. Zawacki, et al.
Docket No. MER-Ch- -11

Dear Judge Jacobson:

Please accept the attached brief and supporting materials in support of Defendants' motion to transfer this matter to the Appellate Division pursuant to R. 1:13-4 and in opposition to plaintiffs' order to show cause.

In light of the schedule that has attached to the present matter, Defendants submit the motion, brief, and supporting materials for the Court's consideration absent one factual certification. Defendants' brief refers to, incorporates, and relies upon the certification of Captain Neil Brosnan of the New Jersey State Police. Defendants will submit Captain Brosnan's certification to the Court and counsel immediately upon obtaining Captain Brosnan's signature upon same, which should be no later than noon. For the Court's convenience, and to minimize the amount of materials not available for the Court's consideration, Defendants herein include the photographic exhibits referred to in Captain Brosnan's certification.



Thank you for your consideration of this matter.
Please do not hesitate to contact me at 609-599-6868 if I may be
of any assistance.

Respectfully submitted,

PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY

By: 

Robert Lougy
Assistant Attorney General

Attachments

c: All counsel (*via email*)
Ms. Valentina DiPippo (*via email*)