



METHFESSEL & WERBEL
A Professional Corporation

JOEL N. WERBEL>
JOHN METHFESSEL, JR.>
FREDRIC PAUL GALLIN*+^
STEPHEN R. KATZMAN#
WILLIAM S. BLOOM>*
ERIC L. HARRISON*+
MATTHEW A. WERBEL>
MARC DEMBLING*+
LORI BROWN STERNBACK*+
I. BLAKELEY JOHNSTONE, III*+
GINA M. STANZIALE>

Of Counsel
JOHN METHFESSEL, SR.>
(1964-1995)
DONALD L. CROWLEY*+
ED THORNTON*+>

Counsel
PAUL J. ENDLER JR.>
GERALD KAPLAN>
JARED P. KINGSLEY*+
JOHN R. KNODEL*+
LESLIE A. KOCH+
CHARLES T. MCCOOK, JR.*>
MARC G. MUCCIOLLO>
RICHARD A. NELKE-
STEVEN K. PARNES+
BRENT R. POHLMAN+
AMANDA J. SAWYER^

Associates
ACHILLE ALIPOUR+
JANICE V. ARELLANO>
CHRISTIAN R. BAILLIE+
SARAH K. DELAHANT+
EDWARD D. DEMBLING>
JASON D. DOMINGUEZ+
MICHAEL R. EATROFF>
JAMES FOXEN^
JENNIFER M. HERRMANN=+
FRANK J. KEENAN+^

Associates, Cont'd
ALLISON M. KOENKE>
ALICIA C. LANGONE+
VIVIAN LEKKAS+
OLIVIA R. LICATA>
JAMES V. MAZEWSKI+
DIAA J. MUSLEH+
RAINA M. PITTS^
MATTHEW L. RACHMIEL>
WILLIAM J. RADA+
NABILA SAEED^
JARED S. SCHURE>
BORIS SHAPIRO>
STEVEN A. UNTERBURGER+
LEVI E. UPDYKE+^

* Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney
+Member of NY & NJ Bar
^Member of PA & NJ Bar
>Member of NJ Bar only
Member of PA Bar only
#Member of NJ & LA. Bar
<Member of NJ & DC Bar
≥Member of NJ, PA & DC Bar
~Member of NY, NJ & DC Bar
=Member of FL Bar

November 22, 2017

Please reply to New Jersey

VIA ELECTRONIC FILING

Clerk, United States District Court
Newark Division
Martin Luther King, Jr. Federal Bldg. &
U.S. Courthouse
50 Walnut Street, Rm. 4015
Newark, NJ 07101

RE: **PORRINO V. TOWNSHIP OF MAHWAH ET AL.**

Our File No. : 85436 ELH
Docket No. : BER-L-282-17

Dear Sir/Madam:

Enclosed please find the following documents:

Notice of Removal (Original and 2 copies)

Would you kindly file same and return a conformed copy.

Very truly yours,

METHFESSEL & WERBEL, ESQS.

Eric L. Harrison
harrison@methwerb.com
Ext. 138

ELH:ede

Methfessel & Werbel
Our file no: 85436 ELH
Page 2

cc: **VIA REGULAR MAIL**
Attorney General of New Jersey
Division of Law
124 Halsey Street, 5th Floor
Newark, New Jersey 07101

VIA EMAIL: mgiacobbe@cgajlaw.com
VIA EMAIL: mathenas@cgajlaw.com
Matthew J. Giacobbe, Esq.
Cleary Giacobbe Alfieri Jacobs, LLC
169 Ramapo Valley Road
Upper Level 105
Oakland, New Jersey 07436

Eric L. Harrison - ID #033381993
METHFESSEL & WERBEL, ESQS.
2025 Lincoln Highway, Suite 200
PO Box 3012
Edison, New Jersey 08818
(732) 248-4200
1(732) 248-2355
harrison@methwerb.com
Attorneys for Township Council of Mahwah
Our File No. 85436 ELH

CLEARY GIACOBBE ALFIERI JACOBS, LLC
169 Ramapo Valley Road
Upper Level – Suite 105
Oakland, New Jersey 07436
Telephone: (973)845-6700
Facsimile: (201)644-7601
Attorneys for Defendant, The Township of Mahwah

CHRISTOPHER S. PORRINO,
ATTORNEY GENERAL OF NEW
JERSEY. CRAIG SASHIHARA,
DIRECTOR OF THE NEW JERSEY
DIVISION ON CIVIL RIGHTS, AND
BOB MARTIN, COMMISSIONER OF
THE DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Plaintiffs,

V.

TOWNSHIP OF MAHWAH AND
MAHWAH TOWNSHIP COUNCIL

Defendants.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CIVIL ACTION NO:

NOTICE OF REMOVAL TO UNITED
STATES DISTRICT COURT

PLEASE TAKE NOTICE that Defendants, Township of Mahwah and Township Council of Mahwah, hereby file this Notice of Removal of the above-captioned matter to the United States District Court for the District of New Jersey, Newark Vicinage from the Superior Court of the

State of New Jersey, County of Bergen where the action is now pending, pursuant to 28 U.S.C. § 1446 and states:

1. The Township of Mahwah and Township Council of Mahwah are defendants in the above-captioned matter.

2. The action is a civil action commenced in the Superior Court of the State of New Jersey, County of Bergen, on or about October 24, 2017 under Docket Number BER-L-282-17 and is pending therein.

3. Because of the following facts defendants request that this action proceed in this Court as an action properly removed to it:

A. In the Complaint, at Counts 1, 2, 7 and 8 Plaintiffs allege violations of the 1st, 4th and 14th Amendments to the United States Constitution.

B. This Court has original jurisdiction under the provisions of 28 U.S.C. § 1332 because Plaintiffs' Complaint raises claims under federal law and the United States Constitution.

D. Accordingly, this action may be removed by Defendants under 28 U.S.C. § 1441.

4. Thirty days have not elapsed since the service of process upon Defendants in state court.

5. Copies of all process, pleadings, and orders served upon defendant are attached to this Notice of Removal, in accordance with 28 U.S.C. § 1446.

6. Concurrent with the filing of this Notice of Removal, Defendants are providing written notice to all parties and the Clerk of the Superior Court of the State of New Jersey, County of Bergen, pursuant to 28 U.S.C. § 1446.

WHEREFORE, Defendants request that this action proceed in this Court as an action properly removed to it.

Respectfully submitted,

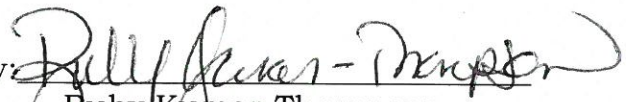
METHFESSEL & WERBEL, ESQS.
Attorneys for Township Council of
Mahwah



By: _____
Eric L. Harrison

DATED: November 15, 2017

**CLEARY, GIACOBBE, ALFIERI &
JACOBS**
Attorneys for Township of Mahwah

By: 
Ruby Kumar-Thompson
For the firm

DATED: November 20, 2017