

# Law Office of Valeria A. Gheorghiu

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June 14, 2018

Honorable Claire C. Cecchi

Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Room 2020  
Trenton, NJ 08608

**RE: Ramapough Mountain Indians, Inc. et al. v. Township of Mahwah et al. 2:18-cv-09228**

Dear Hon. Judge Cecchi:

Pursuant to our case status conference call with your Honor on Friday, June 14<sup>th</sup>, 2018, under your guidance and recommendations, I am writing this letter to reiterate our respective agreements as follows. I also respectfully request that you rule on Jonathan Wallace's *pro hac vice* motion as soon as possible given his 1<sup>st</sup> amendment expertise and extensive involvement in this matter. The parties agree to the following:

1. Defendant's motion to dismiss briefing schedule:  
Due: July 17, 2018  
Opposition: August 18, 2018  
Reply: August 31<sup>st</sup>, 2018
2. The parties shall enter into a stipulated consent order to withdraw the preliminary injunction motion without prejudice.
3. The parties shall enter into a court ordered mediation through the District Court Mediation program in the hopes of settling all matters prior to any Motion to Dismiss ruling and the State Court matters shall exercise their own jurisdiction concurrently.

Thank you for your guidance and supervision.

Regards,

/s/Valeria A. Gheorghiu

