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August 27, 2024

Via eCourts & Facsimile (856) 379-2410

Hon. James R. Swift, J.S.C.  
Superior Court of New Jersey  
60 West Broad Street, Floor 3  
Bridgeton, NJ 08302

Re: *Victoria Lods, et al. v. Celeste M. Riley, in her capacity as County Clerk, et al.*  
Docket No: CUM-0494-24

Dear Judge Swift:

As the Court is aware, this firm represents Plaintiffs Victoria Lods, Antonio Romero, Joseph Sileo and the Cumberland County Regular Republican Organization. Currently pending before the Court is a Verified Complaint and Order to Show Cause seeking a preliminary injunction concerning errors in the drawing for ballot position and resulting erroneous ballot design for the November 5, 2024 General Election (the "Election").

Today, we received confirmation that the office of the County Clerk will redo the drawing for ballot position for the Election on Friday, August 30, 2024 at 3:00 pm. A copy of the notice issued by the Office of the County Clerk is enclosed.

The re-drawing for ballot position and redesign of the ballot is the central relief sought in this lawsuit. A correctly-performed re-drawing for ballot position should result in a statutorily-compliant ballot design. As such, we respectfully request that the Court hold off on issuing a decision on the application for preliminary injunction until after the August 30, 2024 ballot re-drawing is completed. We will certainly keep the Court apprised of the outcome of that process.

We thank the Court for its courtesies.

Respectfully submitted,

/s/ Jason N. Sena  
JASON N. SENA

Enclosure

cc: John M. Carbone, Esq., Counsel to Defendant County Clerk  
(via e-mail [ussrecount@aol.com](mailto:ussrecount@aol.com))

Lizbeth Hernandez, Board of Elections Administrator  
(via e-mail [lizbethhe@CumberlandCountyNJ.gov](mailto:lizbethhe@CumberlandCountyNJ.gov))

From: **Kelly Hoffman** <KELLYHO@cumberlandcountynj.gov>

Date: Tue, Aug 27, 2024 at 1:43 PM

Subject: BALLOT RE-DRAW

To: Michael Testa Jr. <mtestajr@testalawyers.com>, Arvene Kilby <askilby@gmail.com>, kpmccann <kpmccann@chancemccann.com>, Joseph Sileo <josephsi@cumberlandcountynj.gov>, Antonio Romero <antonioro@cumberlandcountynj.gov>, Douglas Albrecht <douglasal@cumberlandcountynj.gov>, Victoria Groetsch-Lods <victorialo@cumberlandcountynj.gov>, Art Marchand <Artma@cumberlandcountynj.gov>, Sandra Taylor <sandrata@cumberlandcountynj.gov>, James Sauro <Jamessau@cumberlandcountynj.gov>

CC: Sandra Olbrich <sandraol@cumberlandcountynj.gov>, Lori Vissell <LORIVI@cumberlandcountynj.gov>

\*\*New E-Mail address notice. My email address now ends in "CumberlandCountyNJ.Gov". Please update your records.\*\*

The Cumberland County Clerk's Office will be administering a ballot re-draw for the 2024 November General Election on Friday, August 30, 2024. The drawing will take place at 3 PM in the Cumberland County Clerk's Office, 60 West Broad Street, Bridgeton NJ 08302.

The re-draw will be open to the public. If you plan to attend please be there by 2:45 p.m.

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