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Attorneys Defendants Township of Mahwah
and Mahwah Township Council

GURBIR S. GREWAL, Attorney General of
New Jersey; CRAIG SASHIHARA, Director of
the New Jersey Division on Civil Rights; and
CATHERINE R. McCABE, Commissioner of
the Department of Environmental Protection,

Plaintiffs,

-vs-

TOWNSHIP OF MAHWAH and MAHWAH
TOWNSHIP COUNCIL

Defendants.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(NEWARK VICINAGE)**

**CIVIL ACTION NO.:
2:17-CV-11988-JMV-JBC**

**NOTICE OF MOTION TO ENFORCE
CONSENT DECREE AND TO DISMISS
MATTER WITH PREJUDICE**

MOTION DAY: FEBRUARY 21, 2023

ORAL ARGUMENT IS REQUESTED

TO: Chief, Deputy Attorney General James Michael, Esq.
New Jersey Division of Law,
Administrative Practice - Newark Group
Administrative Civil Rights Section
124 Halsey Street 5th Floor (PO Box 45029)
Newark, New Jersey 07101
Emails: james.michael@law.njoag.gov;
NJAG.ElectronicService.CivilMatters@law.njoag.gov
(Attorney for Plaintiffs)

PLEASE TAKE NOTICE that on February 21, 2023, at nine o'clock in the forenoon, or as soon thereafter as counsel may be heard, Defendants Township of Mahwah and the Mahwah Township Council (hereinafter "Defendants" or "Township"), by and through their attorneys, Dorsey & Semrau (Jonathan Testa, Esq., appearing), shall apply to the United States District Court for the District of New Jersey, for an Order enforcing the terms and conditions of the prior

“Consent Order and Final Judgment” issued on September 24, 2018, and entry of an Order dismissing this matter with prejudice.

PLEASE TAKE FURTHER NOTICE that Defendants shall rely on the attached Legal Brief, Certification of Counsel, Certification of Township Administrator and exhibits annexed thereto in support of this Motion.

PLEASE TAKE FURTHER NOTICE A proposed form of Order is annexed hereto.

Respectfully submitted,
Dorsey & Semrau, LLC
Attorneys for Defendants
Township of Mahwah and
Mahwah Township Council

By: /s/ Jonathan Testa
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Dated: January 24, 2023