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VIA ELECTRONIC FILING

Hon. Zahid N. Quraishi, U.S.D.J.  
United State District Court of the District of New Jersey  
Clarkson S. Fisher Building  
402 East State Street  
Trenton, NJ 08608

**RE: Kim, et al. v. Hanlon, et al.**  
**Civil Action No.: 24-1098 (ZNQ) (TJB)**

Dear Judge Quraishi:

As the Court ordered at this morning’s conference, please accept the following update about the line and slogan status of each of the three plaintiffs. We will furnish a further update when it becomes available.

**Sarah Schoengood**

Ms. Schoengood timely filed her petitions. Consistent with what she expressed in the Verified Complaint, she has decided against bracketing with any candidates in the three counties covered by her congressional district (Monmouth, Burlington, Mercer). She will select a slogan for each county by tomorrow’s deadline.

**Carolyn Rush**

Ms. Rush timely filed her petitions. In the five counties covered by her district that award a line (Salem uses office block ballots), she will be off the line in two counties (Atlantic and

Ocean). Three counties in the district (Cape May, Cumberland, Gloucester) have stated an intention to to stack all candidates for the congressional race in a shared line<sup>1</sup>. However, in Cape May and Cumberland, the status regarding the official paperwork<sup>2</sup> remains unsettled, and we will update the Court if and when we learn further details. Ms. Rush requested the use of the respective County Democratic Party slogan in Cape May, Cumberland, Gloucester, and requested her own slogan for the two counties (Atlantic and Ocean) where only her opponent will be featured on the line.

### **Rep. Andy Kim**

Of the 19 counties statewide whose ballots feature a county line, Congressman Kim has accepted the line in 13 of those counties (Atlantic, Bergen, Burlington, Essex, Hudson, Hunterdon, Mercer, Monmouth, Morris, Ocean, Passaic, Somerset, and Warren) and will use the slogan of the respective County Democratic Party.

In 11 of those counties, the necessary paperwork documenting the agreement that he will be offered and will accept the county line, is in the process of being completed. In the other two (Hudson and Somerset), there is a verbal agreement in place that he will be offered and will accept the county line, and will use the respective party slogan, but there has been no exchange of paperwork at this time.

Of the remaining six counties, the status is the following:

There have been no discussions between the campaign and the party about the award of the line in Camden and Cumberland. I understand counsel for the Camden County Democratic Party proffered a different perspective on that point in this morning's hearing, but I could not corroborate that.

For Cape May, Gloucester, Middlesex, and Union, there has been some preliminary discussion and outreach between the campaign and the county party. However, there are no final agreements, verbal or otherwise, now in place to the effect that Rep. Kim will be offered and will accept the county line in those counties, or about his slogan in those counties.

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<sup>1</sup> If this arrangement holds, it would create the kind of untenable ballot design that, like the one in Mercer County that was described in the Verified Complaint (DE1, ¶¶ 89-91), which gives the appearance that candidates running for the same office are associated with one another, and risks overvotes among mail voters due to voter confusion, which in turn results in voter disenfranchisement.

<sup>2</sup> That is, the bracketing request and consent letters required by N.J.S.A. 19:49-2 from the relevant candidates and their representatives.

Obviously, if the Court invalidates the county line ballot format, *as all Plaintiffs have requested and continue to request*, the foregoing will all be moot, because there will be no “lines” to request or award.

We will update the Court with additional information as it becomes available.

Respectfully submitted,

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*/s/ Flavio Komuves, Esq.*  
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*/s/ Yael Bromberg, Esq.*  
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