



61 SOUTH PARAMUS ROAD, SUITE 250

PARAMUS, NEW JERSEY 07652

NEW JERSEY

TELEPHONE: (201) 928-1100

TELEFAX: (201) 928-0588

WWW.DECOTIISLAW.COM

PAUL C. KAUFMAN, ESQ.
PKAUFMAN@DECOTIISLAW.COM
201.347.2144

August 30, 2024

Via email only

Charles Kratovil

opra+request-64926-9974ed71@requests.opramachine.com

Re: OPRA Request – Ballot Design Case Expenses

Dear Mr. Kratovil:

We represent the Bergen County Clerk's Office (the "Clerk's Office") and the records request made by you under the Open Public Records Act, N.J.S.A. 47:1A -1 et seq. ("OPRA") was received August 23, 2024 by the County of Bergen and has been forwarded to us for response on behalf of the Clerk's Office. This letter represents the response of the Clerk's Office to your OPRA request.

Generally, a governmental agency is required to respond to a document request within seven (7) business days of receipt of the request. As set forth above, the request is deemed received as of August 23, 2024. Accordingly, the response from the Clerk's Office would be due September 4, 2024. Notwithstanding, this letter represents the entirety of the response of the Clerk's Office to your OPRA request.

Your OPRA request seeks records related to two Federal lawsuits concerning the design of New Jersey's ballots. These lawsuits are: Conforti v. Hanlon, 3:20-cv-08267 (USDNJ) and Kim v. Hanlon, 3:24-cv-01098 (USDNJ) including its Third Circuit appeal (3d Cir, 24-1594). The records requested are documents "constituting or evidencing all payments to outside counsel, legal consultants and other expenses associated with these lawsuits since July 1, 2020" and invoices for outside counsel, legal consultants and other expenses associated with the lawsuits" since July 1, 2020.

Please advised as follows:

1. All invoices and expenses are paid by the through the County. Outside legal counsel on these lawsuits were Kaufman, Semeraro & Leibman, LLP through Nov. 30, 2021 and DeCotiis FitzPatrick Cole & Giblin LLP from Dec. 1, 2021. There were no other legal consultants and all expenses were paid through outside legal counsel. the

Charles Kratovil
Re: OPRA Request – Ballot Design Case Expenses
August 30, 2024
Page 2

Clerk's Office does not pay any invoices, all of which are paid by the County of Bergen. As such, the Clerk's Office does not have any records reflecting payment. Notwithstanding, the Clerk's Office can represent to you that all invoices have been paid.

2. The Clerk's Office does not have separate invoices limited to these lawsuits and all invoices include other matters handled by counsel. As such, the Clerk's Office is attaching all invoices that include these lawsuits. These invoices are itemized on the Schedule attached to this letter.

Pease feel free to contact us if you have any questions regarding the above or attached.

Very truly yours,

Paul Kaufman

Paul Kaufman

Cc: Bergen County Clerk's Office
Attn: John Hogan, Clerk
Steve Chong, Deputy Clerk
(email only)

SCHEDULE OF INVOICES PROVIDED IN
RESPONSE TO KRATOVIL OPRA REQUEST

1. Invoice submitted by Kaufman Semeraro & Leibman LLP ("KSL") dated Oct. 1, 2020;
2. Invoice submitted by KSL dated Nov. 2, 2020;
3. Invoice submitted by KSL dated Dec. , 2020;
4. Invoice submitted by KSL dated Jan. 4, 2021;
5. Invoice submitted by KSL dated Feb. 3, 2021;
6. Invoice submitted by KSL dated March 1, 2021;
7. Invoice submitted by KSL dated Apr. 1, 2021;
8. Invoice submitted by KSL dated May 3, 2021;
9. Invoice submitted by KSL dated June 2, 2021;
10. Invoice submitted by KSL dated July 2, 2021;
11. Invoice submitted by KSL dated Aug. 2, 2021;
12. Invoice submitted by KSL dated Sept. 1, 2021;
13. Invoice submitted by KSL dated Oct. 1, 2021'
14. Invoice submitted by KSL dated Nov. 1, 2021;
15. Invoice submitted by DeCotiis Fitzpatrick Cole & Goblin LLC ("DFCG") dated July 1, 2022;
16. Invoice submitted by DFCG dated Aug. 16, 2022;
17. Invoice submitted by DFCG dated Sept. 21, 2022;
18. Invoice submitted by DFCG dated Oct. 19, 2022;
19. Invoice submitted by DFCG dated Aug. 16, 2022;
20. Invoice submitted by DFCG dated May 16, 2023;
21. Invoice submitted by DFCG dated June 23, 2023;
22. Invoice submitted by DFCG dated July 11, 2023;
23. Invoice submitted by DFCG dated Aug. 10, 2023;
24. Invoice submitted by DFCG dated Sept. 11, 2023;
25. Invoice submitted by DFCG dated Oct. 13, 2023;
26. Invoice submitted by DFCG dated Nov. 17, 2023;
27. Invoice submitted by DFCG dated Dec. 21, 2023;
28. Invoice submitted by DFCG dated Jan. 18, 2024;
29. Invoice submitted by DFCG dated Feb. 16, 2024;
30. Invoice submitted by DFCG dated Mar. 15, 2024;
31. Invoice submitted by DFCG dated Apr. 15, 2024;
32. Invoice submitted by DFCG dated May 20, 2024;
33. Invoice submitted by DFCG dated June 13, 2024;