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Attorneys for Defendants

RAYMOND ARTHUR ABBOTT, et al.,

Plaintiffs,

v.

FRED G. BURKE, et al.,

Defendants.

SUPREME COURT OF NEW JERSEY

Docket No.

Civil Action

**NOTICE OF MOTION FOR RELIEF AND
MODIFICATION OF ABBOTT XX AND
ABBOTT XXI**

Clerk
New Jersey Supreme Court
Richard J. Hughes Justice Complex
25 Market Street
P. O. Box 970
Trenton, New Jersey 08625

David G. Sciarra, Executive Director
Education Law Center
60 Park Place
Suite 300
Newark, New Jersey 07102

Sirs:

PLEASE TAKE NOTICE that defendants hereby move before the Supreme Court of New Jersey for relief and modification of this Court's Orders in Abbott v. Burke, 199 N.J. 140 (2009) ("Abbott XX") and Abbott v. Burke, 206 N.J. 332 (2011) ("Abbott XXI") as

more fully set forth in the Brief and Certifications filed in support of this motion.

PLEASE TAKE FURTHER NOTICE that for the reasons set forth in the accompanying papers, we respectfully request that this Motion be expedited.

PLEASE TAKE FURTHER NOTICE that in support of the instant motion, defendants shall rely upon the following documents:

Memorandum of Law,
Certification of Christopher Cerf,
Certification of Timothy Cunningham,
Certification of Katherine Czehut,
Certification of Kevin Dehmer,
Certification of Donnie Evans,
Certification of John Ficara,
Certification of Matthew Giacobbe,
Certification of Dr. Eric Hanushek,
Certification of Kimberly Harrington,
Certification of Jeffrey Hauger,
Certification of David Hespe,
Certification of Peter Schulman, and
Certification of Dr. Katharine Strunk.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.


PLEASE TAKE FURTHER NOTICE that defendants have filed simultaneously herewith a motion to file an overlength brief.

Dated: September 15, 2016

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By:


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