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Attorney for Plaintiffs:

KEEP A LIBRARY IN WATCHUNG and RICHARD STEINFELD

KEEP A LIBRARY IN WATCHUNG, an
unincorporated association of citizens of the
Borough of Watchung, and RICHARD
STEINFELD,

Plaintiffs,

v.

BOROUGH OF WATCHUNG, a municipal
corporation of the State of New Jersey,
COUNCIL, BOROUGH OF WATCHUNG,
and ADMINISTRATOR, BOROUGH OF
WATCHUNG,

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
SOMERSET COUNTY**

CIVIL ACTION

Docket No.: SOM-L-000710-18

**CERTIFICATION IN SUPPORT OF
ORDER TO SHOW CAUSE**

I, Wolfgang G. Robinson, Esq., do hereby certify as follows:

1. I am an attorney licensed to practice law in the State of New Jersey.
2. I represent Keep a Library in Watchung and Richard Steinfeld in the above-captioned matter, as such I am fully familiar with the facts thereof.

3. On May 16, 2018, I, on behalf of Keep a Library in Watchung and Richard Steinfeld, faxed a request under the Open Public Records Act, N.J.S.A. 47:1A-1 et seq. to the Borough of Watchung.

4. The request sought to obtain a “copy of the resolution or ordinance that was passed by the governing body of the Borough of Watchung authorizing the Borough of Watchung to purchase the property located at 12 Stirling Drive,” the property on which the Watchung Borough Public Library is situated.

5. On May 23, 2018, Regina Angelo, the Administrative Assistant for the Clerk of the Borough of Watchung, e-mailed my office to advise it that my clients’ “request ha[d] been received” and was “being processed,” but that an “extension to Monday, June 4th, [was] needed.”

6. To date, the Borough of Watchung has not responded to the request or indicated that the record requested is in storage or archived.

7. A true and correct copy a request that was made under the Open Public Records Act on May 16, 2018, is attached as Exhibit T to the First Amended Complaint in Lieu of Prerogative Writs and for Declaratory and Injunctive Relief.

8. A true and correct copy of the e-mail of May 23, 2018, referred to in paragraph 5 of this certification, is attached as Exhibit U to the First Amended Complaint in Lieu of Prerogative Writs and for Declaratory and Injunctive Relief.

I certify that the foregoing statements made by me are true and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: June 7, 2018

By: 
Wolfgang G. Robinson, Esq.