



JOHN J. GIBBONS FELLOWSHIP IN  
PUBLIC INTEREST & CONSTITUTIONAL LAW

HONORABLE JOHN J. GIBBONS

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April 3, 2019

Honorable Mary C. Jacobson, A.J.S.C.  
New Criminal Courthouse  
400 S. Warren Street, 4th Floor  
Trenton, NJ 08650

**Re: *Latino Action Network, et al. v. State of New Jersey, et al.***  
**Docket No. MER-L-001076-18**

Dear Judge Jacobsen:

Please accept this letter in lieu of more formal status report in the above-captioned matter, as required by the Court in Your Honor's Case Management Order of January 8, 2019.

After participating in discussions with representatives of the State for several months, Plaintiffs have determined that progress toward a solution to New Jersey's school segregation problem has not been sufficient to justify continued discussions at this time. Accordingly, at this time, Plaintiffs have determined that, in order to conclude this matter, whether through litigation or settlement, they require a judgment as to liability. To that end, Plaintiffs respectfully request that the Court vacate the current stay of this matter, require the State to answer the Complaint, and set a status conference at which the course of future proceedings can be determined.

Thank you for your kind consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Lawrence S. Lustberg", is written over a circular blue stamp or watermark.

Lawrence S. Lustberg

LSL:kat

cc: Joan M. Scatton, Deputy Attorney General (via efile and email)  
Michael S. Stein, Esq. (via efile and email)