



Atlantic County

Department of Law

James F. Ferguson
*Department Head
County Counsel*

609/343-2279 FAX: 343-2373
TDD: 348-5551

Office of the Adjuster
609/343-2361 FAX: 343-2322

Dennis Levinson
County Executive

December 30, 2022

Judge Renee Marie Bumb, U.S.D.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

RE: Koons v. Reynolds, 22-cv-7464-RMB-EAP

Dear Judge Bumb,

I am County Counsel for Atlantic County and in that role, I represent the Atlantic County Prosecutor's Office in civil matters. I have just entered my appearance on behalf of Atlantic County Prosecutor, William Reynolds, a named Defendant in the above captioned case.

I hereby join the argument submitted by the State Attorney General's Office in Opposition to the Plaintiff's Motion for a Temporary Restraining Order. That Motion has a current return date of January 5, 2023. I kindly request the Court Deputy Clerk to provide me with the zoom link for the hearing. I also reserve the right to file a Motion to Dismiss for Failure to State a Cause of Action on behalf of Prosecutor Reynolds pursuant to Fed. R. Civ. P. 12(b)(6).

Thank you for your kind attention.

Respectfully,
/s/ James F. Ferguson
County Counsel

cc: All counsel of record via electronic filing
William Reynolds, Atlantic County Prosecutor

JF/tf

