

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

NEWARK EDUCATION WORKERS :	Civil Action No. 2:18-cv-11025-KSH-CLW
CAUCUS, et al., :	
Plaintiffs, :	<b>NOTICE OF MOTION FOR AN</b>
v. :	<b>EXTENSION OF TIME TO ANSWER,</b>
CITY OF NEWARK, et al., :	<b>MOVE OR OTHERWISE REPLY</b>
Defendants, :	<b>(L.CIV.R. 6.1(b))</b>
_____ :	<i>Electronically Filed</i>

**PLEASE TAKE NOTICE** that Defendants, City of Newark, Ras Baraka, in his official capacity as Mayor of the City of Newark, Newark Department of Water and Sewer Authorities, and Andrea Hall Adebowale, in her official capacity as Director of the Newark Department of Water and Sewer Utilities (“Newark Defendants”), through its attorneys, Maraziti Falcon, LLP, will move before the Honorable Cathy L. Waldor, U.S.M.J. on August 20, 2018 for an Order extending the time within which Defendants may answer, move or otherwise reply for good cause shown and excusable neglect in failing to act prior to the expiration of the original time, pursuant to Fed. R. Civ. P. 6(b)(1)(B).

In support of the City’s motion, the Newark Defendants will rely on the Certification of Counsel (Avion M. Benjamin, Esq.) in Support of the Motion and Certification of Counsel

submitted herewith. A proposed Order is annexed hereto. Pursuant to L. Civ. R. 7.1(d)(4), please accept this as Defendants' statement that no brief is necessary.

For the reasons set forth in the attached, the Newark Defendants respectfully request the time to respond to the Complaint be extended to August 28, 2018.

MARAZITI FALCON, LLP  
150 John F. Kennedy Parkway  
Short Hills, New Jersey 07078  
(973) 912-9008  
Attorneys for Defendants,  
City of Newark, Ras Baraka, in his  
official capacity as Mayor of the City  
of Newark, Newark Department of  
Water and Sewer Authorities, and  
Andrea Hall Adebowale, in her  
official capacity as Director of the  
Newark Department of Water and  
Sewer Utilities

Dated: July 27, 2018

By: s/ Joseph J. Maraziti, Jr.  
Joseph J. Maraziti, Jr., Esq.