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LEONOR ALCANTARA, individually and as
Guardian ad Litem for E.A.; LESLIE
JOHNSON, individually and as Guardian ad
Litem for D.J.; JUANA PEREZ, individually
and as Guardian ad Litem for Y.P.; TATIANA
ESCOBAR individually; and IRA SCHULMAN,
individually and as Guardian ad Litem for A.S.
Petitioners,

v.

Angelica Allen-McMillan, Acting
Commissioner; The New Jersey State Board Of
Education; And The New Jersey Department Of
Education
Respondents.

) On remand to the Agency,
) Appellate Docket No.
) A-3693-20
)
)
) OAL DOCKET No:
) EDU 11069-2014S
)
) Agency Ref. No.:
) 156-6/14
)
) CERTIFICATION OF
) ARTHUR H. LANG, ESQ.,
) IN SUPPORT OF THE
) MOTION FOR
) CLARIFICATION
)
)

I, ARTHUR H. LANG, of full age, hereby certify the following statement of events since the Appellate Division (AD) remanded the above captioned matter to the Acting Commissioner:

- 1) March 6, 2023: Appellate Division ruling that Lakewood students have been denied a Thorough and Efficient education (T&E) and remand to Acting Commissioner (AC) regarding the constitutionality of the School Funding Reform Act (SFRA) as applied to the Lakewood School District (LSD). (Exhibit 1).
- 2) April 18, 2023: Testimony of AC before the Senate Budget and Appropriations Committee regarding the Alcantara case.*

* <https://www.njleg.state.nj.us/archived-media/2022/SBAB-meeting-list/media-player?committee=SBAB&agendaDate=2023-04-18-10:30:00&agendaType=H&av=V>

(Timestamp 44:26).

- 3) April 20, 2023: Paul L. Tractenberg (PLT) letter, 45 days after remand, to AC requesting expedited final decision on remand. (Exhibit 2).
- 4) May 1, 2023: Motion for Emergency Relief to AC. (Exhibit 3).
- 5) May 1-3, 2023: Email exchange with Donna Arons, Assistant Attorney General (AG), regarding AG's lawyers handling this matter. (Exhibit 4).
- 6) May 12, 2023: AC's letter (Exhibit 5) and order (Exhibit 6) to co-counsel regarding denial of Motion for Emergency Relief.
- 7) May 18, 2023: Motion to AD for Leave to File Interlocutory Appeal of AC's denial of Motion for Emergency Relief. (Exhibit 7).
- 8) May 18, 2023: Application to AD for Permission to File Emergent Motion. (Exhibit 8).
- 9) May 19, 2023: AD's denial of Permission to File Emergent Motion. (Exhibit 9).
- 10) May 25, 2023: PLT letter to AC seeking short and specific timeline for remand process and final decision. (Exhibit 10).
- 11) May 30, 2023: State's brief to AD opposing our Motion for Leave to File Interlocutory Appeal of AC's denial of Emergency Relief. (Exhibit 11).
- 12) June 2, 2023: PLT of reply brief (AD refused to accept it). (Exhibit 12)
- 13) June 9, 2023: AD denial of our Motion for Leave to File and Interlocutory Appeal. (Exhibit 13).
- 14) June 13, 2023: PLT email and letters to AC. (Exhibit 14).
- 15) June 14, 2023: Emails between Lang and DAG Weber regarding setting up conference call. (Exhibit 15).
- 16) June 14, 2023: Conference call among Lang, PLT and DAGs Weber and

Lynch.

17) June 15, 2023: PLT email and letter to DAGs Weber and Lynch memorializing June 14, 2023, conference call and referencing June 28 follow-up call. (Exhibit 16).

18) June 27, 2023: DAG Weber email and letter rejecting PLT account of conference call and indicating, for first time, that DAGs Weber and Lynch were representing AC only before the AD and not in connection with remand . (Exhibit 17).

19) June 29, 2023: PLT email and letter to DAG Weber setting forth problems with his June 27 email and letter. (Exhibit 18).

I certify that the foregoing statement made by me is true. I am aware that if any statement made by me is willingly false, I am subject to punishment.

Dated: July 6, 2023

s/ Arthur H Lang

Attorney for Petitioners/Appellants