

Arthur H. Lang

Attorney at Law



918 East Kennedy Blvd. • Lakewood, New Jersey 08701 • Phone: 732-609-5530
E-Mail: lakewoodlaw@gmail.com NJ Att. No. 014102012

January 30, 2018

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

**Re: Leonor Alcantara et. al., v. Michael Inzelbuch et. al
MER-L-000244-18**

Leonor Alcantara et. al., v. David Hesse et. al.
OAL Docket No: EDU 11069-2014 S
Agency Ref. No. 156-6/14

Dear Judge Jacobson:

Please find enclosed a courtesy copy of a motion for an order to show cause to enforce a subpoena commanding Lakewood School District Superintendent Laura Winters to testify on February 7, 2018, and to enforce a subpoena commanding Lakewood School District Assistant Business Administrator Robert Finger to testify on February 12, 2018, in the referenced action in the Office of Administrative Law. This matter is urgent and of great public importance.

Respectfully Submitted,

s/ Arthur H. Lang

Arthur H. Lang
Attorney at Law

ARTHUR H. LANG
918 East Kennedy Blvd.
Lakewood, NJ 08701
(732) 609-5530
lakewoodlaw@gmail.com
Attorney for Plaintiffs

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.

Plaintiffs

v.

MICHAEL INZELBUCH, LAURA WINTERS and
ROBERT FINGER and the LAKEWOOD BOARD
OF EDUCATION

Defendants

) SUPERIOR COURT OF
) NEW JERSEY
) LAW DIVISION
) MERCER COUNTY
) Docket No.:
) MER-L-000244-18
)
) NOTICE FOR AN ORDER
) TO SHOW CAUSE TO
) ENFORCE SUBPOENA TO
) APPEAR IN THE
) OFFICE OF
) ADMINISTRATIVE LAW

To: Michael Inzelbuch, Esq.
Lakewood Board of Education
1340 W County Line Road
Lakewood, NJ 08701

Laura Winters
Superintendent
Lakewood Board of Education
200 Ramsey Avenue
Lakewood, NJ 08701

Robert Finger
Interim Business Administrator
200 Ramsey Avenue
Lakewood, NJ 08701

SIR/MADAM:

Plaintiff Arthur H. Lang, respectfully represent:

1. This application seeks the entry of an Order to Show Cause compelling the defendants to show cause why plaintiff should not be granted the following relief:

a) AN ORDER for Laura Winters, superintendent of the Lakewood School District to comply with a subpoena that was served upon her commanding her appearance to testify before the Honorable Susan M. Scarola at Office of Administrative Law, Quakerbridge Plaza, Building 9, Mercerville, New Jersey, on February 7, 2018 at 9:00 a.m., and any continuations thereafter, on behalf of Petitioners in Alcantara et. al. v. Hesse, et.al, OAL DOCKET No: EDU 11069-2014S, challenging the allocation method and state funding received by the Lakewood School District.

b) AN ORDER for Robert Finger to comply with a subpoena that was served upon her commanding her appearance to testify before the Honorable Susan M. Scarola at Office of Administrative Law, Quakerbridge Plaza, Building 9, Mercerville, New Jersey, on February 12, 2018 at 9:00 a.m., and any continuations thereafter, on behalf of Petitioners in Alcantara et. al. v. Hesse, et.al, OAL DOCKET No: EDU 11069-2014S, challenging the allocation method and state funding received by the Lakewood School District.

c) AN ORDER for Michael I. Inzelbuch, Attorney for the Lakewood School District, to cooperate with discovery and the attendance of witnesses as stipulated between the Lakewood Board of Education and Petitioners, and to cease and desist from obstructing discovery and the attendance of witnesses in way that is not permitted, to the detriment of Petitioners and the students in the Lakewood School District, in the conduct of Alcantara et. al. v. Hesse, et.al, OAL DOCKET No: EDU 11069-2014S, challenging the allocation method and state funding received by the Lakewood School District, to be heard before the Honorable Susan M. Scarola at Office of Administrative Law, Quakerbridge Plaza, Building 9, Mercerville, New Jersey, commencing on February 5, 2018 at 9:00 a.m.

2. Defendants were given notice of this application on or about January 30, 2018 when served with true copies of the accompanying Verified Complaint via email.

WHEREFORE, applicants LEONOR ALCANTARA, et. al. prays for the entry of an Order to Show Cause in the form annexed

hereto, and such other relief as this Court deems just and proper.

s/ Arthur H. Lang

Arthur H. Lang
Attorney for Plaintiffs
Dated: January 30, 2018

ARTHUR H. LANG
918 East Kennedy Blvd.
Lakewood, NJ 08701
(732) 609-5530
lakewoodlaw@gmail.com
Attorney for Plaintiffs

-----) SUPERIOR COURT OF
LEONOR ALCANTARA, individually and as) NEW JERSEY
Guardian ad Litem for E.A.; LESLIE) LAW DIVISION
JOHNSON, individually and as Guardian) MERCER COUNTY
ad Litem for D.J.; JUANA PEREZ,)
individually and as Guardian ad Litem) Docket No.:
for Y.P.; TATIANA ESCOBAR) MER-L-000244-18
individually; and IRA SCHULMAN,)
individually and as Guardian ad Litem)
for A.S.)
)
) Plaintiffs) NOTICE FOR AN
) v.) ENTRY OF AN ORDER
)) TO SHOW CAUSE TO
MICHAEL INZELBUCH, LAURA WINTERS and) ENFORCE SUBPOENA TO
ROBERT FINGER and the LAKEWOOD BOARD) APPEAR IN THE
OF EDUCATION) OFFICE OF
)
) Defendants) ADMINISTRATIVE LAW

This matter being brought before the Court on motion of Arthur H. Lang for LEONOR ALCANTARA, et. al., plaintiffs, for an order to show cause to enforce subpoenas to appear in the Office of Administrative Law in Alcantara et.al v. Hespe, et. al., heretofore having properly served a subpoena upon Laura Winters, superintendent of Lakewood School District on January 30, 2018, commanding her appearance at 9:00 a.m. on February 7, 2018; and having properly served a subpoena upon Robert Finger, Assistant Business Administrator of the Lakewood School District on January 30, 2018, commanding his appearance at 9:00 a.m. on February 12, 2018; and whereupon Michael I. Inzelbuch, Esq., attorney for the Lakewood School District indicated that the said witnesses cannot attend on said dates without

reason; and because of the compelling public interest in the successful outcome of said action in the OAL on behalf the children that Laura Winters, Robert Finger and Michael I. Inzelbuch, Esq., represent; and it appearing to the Court upon review of the Verified Complaint submitted on behalf of the plaintiffs in support of this Order to Show Cause, as well as any submissions or arguments in opposition, that immediate and irreparable damage may result to plaintiff before a hearing can be heard; and good cause having been shown for the entry of this Order;

IT IS on this ____ day of _____

ORDERED, that defendants, show cause before this Court on the 2nd day of February, 2018, 9:00 a.m. o'clock in the morning or as soon thereafter as counsel can be heard, at the Mercer County Civil Courthouse, 175 South Broad Street, Trenton, NJ 08650-0068, why relief sought in the Verified Complain should not be granted; and it is

FURTHER ORDERED that a copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendants personally, through defendants' counsel, or overnight (including Federal Express) mail within 1 day of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process; and it is

FURTHER ORDERED that defendants shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by February 1, 2018. The original documents must be filed

with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. You must send a copy of your opposition papers directly to Judge Mary C. Jacobson, whose address is New Criminal Courthouse 400 S. Warren Street, 4th Floor, Trenton, NJ 08650. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking; and it is

FURTHER ORDERED, if the plaintiff must file and serve any written reply to the defendant's order to show cause opposition by _____, 20__; and it is

FURTHER ORDERED, IF the defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return date; and it is

FURTHER ORDERED, if the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date; and it is

FURTHER ORDERED, Defendant take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it. These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$135.00 filing fee payable to the "Clerk of the Superior Court." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands; and it is

FURTHER ORDERED, if you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided; and it is

FURTHER ORDERED, the Court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than ___ days before the return date.

Mary C. Jacobson, A.J.S.C.

ARTHUR H. LANG
918 East Kennedy Blvd.
Lakewood, NJ 08701
(732) 609-5530
lakewoodlaw@gmail.com
Attorney for Plaintiffs

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.; and IRA SCHULMAN,
individually and as Guardian ad Litem
for A.S.

Plaintiffs

v.

MICHAEL INZELBUCH, LAURA WINTERS and
ROBERT FINGER and the LAKEWOOD BOARD
OF EDUCATION

Defendants

) SUPERIOR COURT OF
) NEW JERSEY
) LAW DIVISION
) MERCER COUNTY
) Docket No.:
) MER-L-000244-18
)
) ORDER TO ENFORCE
) SUBPOENA TO APPEAR
) IN THE OFFICE OF
) ADMINISTRATIVE LAW

The matter being brought before the Court on motion of
Arthur H. Lang for LEONOR ALCANTARA, et. al., plaintiffs,
for an order to show cause to enforce subpoena to appear in
the Office of Administrative Law in Alcantara et.al v.
Hespe, et. al., OAL docket No. EDU 11069-2014S, heretofore
having served a subpoena upon Laura Winter, superintendent
of Lakewood School District on January 30, 2018, commanding
her appearance at 9:00 a.m. on February 7, 2018; and having
properly served a subpoena upon Robert Finger, Assistant
Business Administrator of the Lakewood School District on
January 30, 2018, commanding his appearance at 9:00 a.m. on
February 12, 2018; and whereupon Michael I. Inzelbuch,

Esq., attorney for the Lakewood School District indicated that the said witnesses cannot attend on said dates without reason; and because of the compelling public interest in the successful outcome of said action in the OAL on behalf the children that Laura Winters, Robert Finger and Michael I. Inzelbuch, Esq. represent; it is on this _____ day of _____, 2018,

ORDERED that:

1) Laura Winters, superintendent of the Lakewood School District appear to testify before the Honorable Susan M. Scarola at Office of Administrative Law, Quakerbridge Plaza, Building 9, Mercerville, New Jersey, on February 7, 2018 at 9:00 a.m., and any continuations thereafter, on behalf of Petitioners in Alcantara et. al. v. Hespe, et.al, OAL DOCKET No: EDU 11069-2014S, challenging the allocation method and state funding received by the Lakewood School District.

2) Robert Finger, Assistant Business Administrator of the Lakewood School District appear to testify before the Honorable Susan M. Scarola at Office of Administrative Law, Quakerbridge Plaza, Building 9, Mercerville, New Jersey, on February 12, 2018 at 9:00 a.m., and any continuations thereafter, on behalf of Petitioners in Alcantara et. al. v. Hespe, et.al, OAL DOCKET No: EDU 11069-2014S, challenging the allocation method and state funding received by the Lakewood School District.

3) Michael I. Inzelbuch, Attorney for the Lakewood School District, will cooperate with discovery and the attendance of witnesses as stipulated between the Lakewood Board of Education and Petitioners, and to cease and desist from obstructing discovery and the attendance of witnesses

in way that is not permitted, to the detriment of
Petitioners and the students in the Lakewood School
District, and in breach of a stipulation between Plaintiffs
and the Lakewood Board of Education dated October 3, 2016
that the Lakewood Board of Education will give any and all
assistance to Plaintiffs in the conduct of Alcantara et.
al. v. Hespe, et.al, OAL DOCKET No: EDU 11069-2014S
challenging the allocation method and state funding
received by the Lakewood School District.

Mary C. Jacobson A.J.S.C.

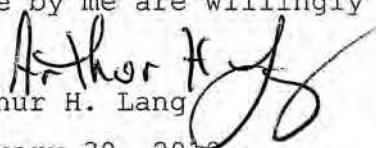
COMPLAINT VERIFICATION

I, Arthur H. Lang, of 918 East Kennedy Blvd., Lakewood, New Jersey, 08701, being of full age and duly certify and say:

1. I represent the petitioners in Alcanata et. al. v. Hespe, et. al. EDU 11069-2014S. As such I am fully familiar with all of the facts of this case and am authorized to make this verification.

2. I have written the foregoing papers and the factual allegations set forth herein are true and correct to the best of my knowledge, except those facts alleged upon information and belief. As to the facts alleged upon information and belief, they are true and correct to the best of my information and belief.

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


Arthur H. Lang

January 30, 2018

ARTHUR H. LANG
918 East Kennedy Blvd.
Lakewood, NJ 08701
(732) 609-5530
lakewoodlaw@gmail.com
Attorney for Plaintiffs

-----) SUPERIOR COURT OF
LEONOR ALCANTARA, individually and as) NEW JERSEY
Guardian ad Litem for E.A.; LESLIE) LAW DIVISION
JOHNSON, individually and as Guardian) MERCER COUNTY
ad Litem for D.J.; JUANA PEREZ,) Docket No.:
individually and as Guardian ad Litem) MER-L-000244-18
for Y.P.; TATIANA ESCOBAR)
individually; and IRA SCHULMAN,) CERTIFICATION OF
individually and as Guardian ad Litem) ARTHUR H. LANG ON
for A.S.) BEHALF OF
Plaintiffs) PLAINTIFFS IN
v.) SUPPORT OF AN ORDER
MICHAEL INZELBUCH, LAURA WINTERS and) TO SHOW CAUSE TO
ROBERT FINGER and the LAKEWOOD BOARD) ENFORCE SUBPOENA TO
OF EDUCATION) APPEAR IN THE
Defendants) OFFICE OF
) ADMINISTRATIVE LAW

I, Arthur H. Lang, of full age, certify as follows:

1. The annexed documents are true copies of what they purport to be.

2. Exhibit 1 is a letter I wrote on behalf of Petitioners in Alcantara v. Hespe, stipulating in part, the cooperation and assistance of the Lakewood Board of Education as condition for its participation, followed by its acceptance by Eric Harrison, Esq. on behalf of the Lakewood Board of Education.

3. Exhibit 2 is the Notice of Hearing date to determine

amount of State funding received by the Lakewood School District" ordered August 14, 2017 by the Honorable Susan M. Scarola, ALJ.

4. Exhibit 3 is a subpoena and proof of service commanding the appearance of Superintendent Laura Winter.

5. Exhibit 4 is a subpoena commanding the appearance of Assistant Business Administrator Robert Finger followed by an email from the New Jersey Legal Service indicating that they served the subpoena. Proof will be forthcoming when I receive it.

6. I further certify that within 30 minutes after I served Ms. Winters at her home I received a text message from Michael I. Inzelbuch saying, "Mrs Winters and Mr Finger are not available on the days u selected."

7. Plaintiffs seek an order compelling the attendance of defendants Laura Winters and Robert Finger to testify at the hearing on the dates that they were summoned, and in the alternative, that their attorney will provide a reason why they must report to work on those dates and not attend the hearing, and that as the superintendent, business administrator and attorney for a school district that for years has complained of underfunding, nothing is more important than the timely outcome of this matter, and because delay will irreparably harm the Plaintiffs who

petitioned the Commissioner of Education on behalf of the children of Lakewood and only after four years of procedural delays the matter will be finally be heard, and over five months have passed since of the hearing dates have been ordered, and pursuant to N.J.S.A. § 1:1-11.5 a "party who has requested issuance of a subpoena may seek enforcement of the subpoena by bringing an action in the Superior Court pursuant to the New Jersey Court Rules."

I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

s/ Arthur H. Lang

Arthur H. Lang

Dated: January 30, 2018

Exhibit 1

Arthur H. Lang

Attorney at Law

918 East Kennedy Blvd. • Lakewood, New Jersey 08701 • Phone: 732-609-5530
E-Mail: lakewoodlaw@gmail.com



October 13, 2016

Eric L. Harrison
Methfessel & Werbel
2025 Lincoln Highway, Suite 200
P.O. Box 3012
Edison, N.J. 08818

Marc H. Zitomer
Schenck, Price, Smith & King, LLP.
220 Park Avenue
PO Box 991
Florham Park, NJ 07932

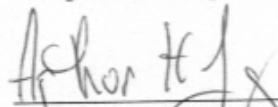
Re: Leonor Alcantara et. al., v. David Hesse et. al.
OAL Docket No: EDU 11069-2014 S
Agency Ref. No. 156-6/14

Dear Mr. Harrison and Mr. Zitomer:

In response to your letter to Judge Metzger, I offer the following stipulations to your participation:

- 1) The BOE will not settle with the DOE or move to Superior Court without consent of the Petitioners.
- 2) The BOE will give any and all assistance to Petitioners.
- 3) Respondents will not conduct additional discovery because of the participation of the BOE.
- 4) Members of the BOE will not make comments to the press or any public statements concerning the case without the consent of the Petitioners.

Respectfully,



Arthur H. Lang
Attorney at Law

Cc: Dan Grossman via email
Paul L. Tractenberg, Participant via email

Subject Alcontara v. Hespe - BOE meeting today/Letter of Stipulation
From Eric Harrison <harrison@methwerb.com>
To 'Arthur H. Lang' <lakewoodlaw@thejnet.com>, Mhz <mhz@spsk.com>
Cc Danielgrossman <danielgrossman@cranfordlegal.com>, Paulltractenberg <Paulltractenberg@gmail.com>
Date 10/15/16 9:13 am



-
- Letter of Stipulation for Paricipation.pdf (140 KB)

Good morning Arthur. While I can't stipulate on behalf of the Board to bar any of its members from speaking to the press, I can represent that there are no plans to do so and we agree to all of the other conditions you have articulated for our participation in the case.

Eric Harrison
Partner
Methfessel & Werbel, P.C.
2025 Lincoln Hwy
Suite 200
Edison, NJ 08817
Phone: 732-248-4200 x138
Fax: 732-248-2355
5

-----Original Message-----

From: Arthur H. Lang [mailto:lakewoodlaw@thejnet.com]
Sent: Thursday, October 13, 2016 4:23 PM
To: Eric Harrison <harrison@methwerb.com>; Mhz <mhz@spsk.com>
Cc: Danielgrossman <danielgrossman@cranfordlegal.com>; Paulltractenberg <Paulltractenberg@gmail.com>
Subject: BOE meeting today/Letter of Stipulation

Dear Mr. Harrison and Mr. Zitomer,

Please see attached letter of stipulation to the participation of the BOE. Please discuss in conference today. Let me know if there are any questions.

Sincerely,

Arthur Lang

Exhibit 2



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW
P.O. Box 049
Trenton, NJ 08625-0049

OAL Docket. No.: EDU 11069-2014 S

Agency Ref. No.: 156-6/14

Transmitting Agency: Department of Education

Judge: Susan M. Scarola
Judge Phone No. (609) 689-4051

Alcantara, Leonor, Individually and as Guardian ad Litem for E.A.,
et. al. v. Hespe, David Comm. of Ed., NJ State Bd. of Ed. & NJ
Dept. of Ed.

Notice of
Hearing

Nature of proceeding:

Petitioners challenge the allocation method and amount of State funding received by the Lakewood School District.

The hearing in this case will be held on:

Date: 02/05/2018

Time: 9:00AM

**Location: Office of Administrative Law 9 Quakerbridge Plaza Mercerville, NJ
08619**

Date: 02/07/2018

Time: 9:00AM

**Location: Office of Administrative Law 9 Quakerbridge Plaza Mercerville, NJ
08619**

Date: 02/12/2018

Time: 9:00AM

**Location: Office of Administrative Law 9 Quakerbridge Plaza Mercerville, NJ
08619**

Date: 02/13/2018

Time: 9:00AM

**Location: Office of Administrative Law 9 Quakerbridge Plaza Mercerville, NJ
08619**

Date: 02/22/2018

Time: 9:00AM

**Location: Office of Administrative Law 9 Quakerbridge Plaza Mercerville, NJ
08619**



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW
P.O. Box 049
Trenton, NJ 08625-0049

Directions are on the OAL website www.state.nj.us/oal (see the Locations tab).

The rules controlling the hearing are found in N.J.A.C. 1:1-1 et. seq. These rules can be accessed through a link on the Office of Administrative Law's website: www.state.nj.us/oal. (see the "Rules" section under the Rules tab). If you need to subpoena a witness, forms and instructions are on the Office of Administrative Law's website: www.state.nj.us/oal, (see the "Subpoena" section under the Forms tab).

If you do not attend the hearing, the file will be returned to the transmitting agency for appropriate action which may include imposition of the proposed penalty or granting the relief requested by the other party.

In the event of inclement weather or other emergency, please contact the Superior Court in the county in which this matter is scheduled. If that Superior Court is closed, this matter will be cancelled and you will be notified by the OAL of the new date. *County courthouse closings:* www.judiciary.state.nj.us/closing.htm

August 21, 2017

Date

Deputy Clerk, OAL



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW
P.O. Box 049
Trenton, NJ 08625-0049

SERVICE LIST
OAL DOCKET NO. EDU 11069-2014 S

Daniel Louis Grossman, Esq.
11 Commerce Drive
Suite 308
Cranford, NJ 07016

Michael I. Inzelbuch, Esq.
Attorney at Law
1340 West County Line Road
Lakewood, NJ 08701

Arthur Lang, Esq.
918 East Kennedy Blvd.
Lakewood, NJ 08701

Paul L. Tractenberg, Esq.
123 Washington Street
Newark, NJ 07102

Jennifer Hoff, DAG
Division of Law
P.O. Box 112
Trenton, NJ 08625

Geoffrey N. Stark, DAG
Department of Law & Public Safety
Division of Law
PO Box 112
Trenton, NJ 08625-0112

Exhibit 3

ARTHUR H. LANG
918 East Kennedy Blvd.
Lakewood, NJ 08701
(732) 609-5530
lakewoodlaw@gmail.com
Attorney for Petitioners

LEONOR ALCANTARA, individually and as)	
Guardian ad Litem for E.A.; LESLIE)	
JOHNSON, individually and as Guardian)	
ad Litem for D.J.; JUANA PEREZ,)	OAL DOCKET No:
individually and as Guardian ad Litem)	EDU 11069-2014S
for Y.P.; TATIANA ESCOBAR)	
individually; and IRA SCHULMAN,)	Agency Ref. No.:
individually and as Guardian ad Litem)	156-6/14
for A.S.)	
)	
Petitioners,)	
)	
v.)	SUBPOENA
)	
DAVID HESPE, COMMISSIONER OF THE NEW)	
JERSEY DEPARTMENT OF EDUCATION; the)	
NEW JERSEY STATE BOARD OF EDUCATION;)	
and the NEW JERSEY DEPARTMENT OF)	
EDUCATION)	
)	
Respondents)	

To: Laura Winters
Superintendent
Lakewood Board of Education
68 Pilot Drive
Brick, New Jersey 08723

As provided by N.J.S.A. 52:14F-I, et seq., and N.J.A.C. 1:1-11.1, et seq., you are directed to appear and testify before the Office of Administrative Law, Quakerbridge Plaza, Building 9, Mercerville, New Jersey, on February 7, 2018 at 9:00 a.m., February 12, 2018 at 9:00 a.m., and any continuations thereafter, on behalf of Petitioners in the above-entitled action. You must also bring with you documents indicated below, if any.

Questions concerning this subpoena should be directed to the party requesting your appearance. If you have good cause not to appear at the hearing or produce any listed documents, you must present your reasons to the judge. Failure to appear and bring the requested documents with you may subject you to a penalty .

Dated: January 30, 2018



A handwritten signature in blue ink, appearing to read "Arthur H. Lang", is written over a horizontal line.

Subpoena requested by Arthur H. Lang, Esq. Telephone number 732-609-5530

PROOF OF SERVICE

On January 30, 2018, I personally served the original of this subpoena by delivering it to the person named at or by mailing the original subpoena, certified mail return receipt requested, by handing it to a person who identified himself as the husband of Laura Winters, at the home address of Mr. and Mrs. Winters, 68 Pilot Drive, Brick New Jersey, 08723.

I have paid to that person an attendance fee of \$2.00 per day and, if the witness is not a resident of the county where the hearing will be held, a mileage fee of \$2.00 per 30 miles of travel to and from the hearing.

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

Dated: January 30, 2018

SIGNATURE

Dated January 30, 2018

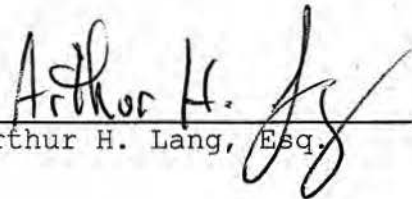

Arthur H. Lang, Esq.

Exhibit 4

ARTHUR H. LANG
918 East Kennedy Blvd.
Lakewood, NJ 08701
(732) 609-5530
lakewoodlaw@gmail.com
Attorney for Petitioners

LEONOR ALCANTARA, individually and as)	
Guardian ad Litem for E.A.; LESLIE)	
JOHNSON, individually and as Guardian)	
ad Litem for D.J.; JUANA PEREZ,)	OAL DOCKET No:
individually and as Guardian ad Litem)	EDU 11069-2014S
for Y.P.; TATIANA ESCOBAR)	
individually; and IRA SCHULMAN,)	Agency Ref. No.:
individually and as Guardian ad Litem)	156-6/14
for A.S.)	
)	
Petitioners,)	
)	
v.)	SUBPOENA
)	
DAVID HESPE, COMMISSIONER OF THE NEW)	
JERSEY DEPARTMENT OF EDUCATION; the)	
NEW JERSEY STATE BOARD OF EDUCATION;)	
and the NEW JERSEY DEPARTMENT OF)	
EDUCATION)	
)	
Respondents)	

To: Robert Finger
Interim Business Administrator
Lakewood Board of Education
200 Ramsey Avenue
Lakewood, New Jersey 08701

As provided by N.J.S.A. 52:14F-I, et seq., and N.J.A.C. 1:1-11.1, et seq., you are directed to appear and testify before the Office of Administrative Law, Quakerbridge Plaza, Building 9, Mercerville, New Jersey, on February 12, 2018, at 9:00 a.m., and any continuations thereafter, on behalf of Petitioners in the above-entitled action. You must also bring with you documents indicated below, if any.

Questions concerning this subpoena should be directed to the party requesting your appearance. If you have good cause not to appear at the hearing or produce any listed documents, you must present your reasons to the judge. Failure to appear and bring the requested documents with you may subject you to a penalty .

Dated: January 29, 2018

s/ Arthur H. Lang

Subpoena requested by Arthur H. Lang, Esq. Telephone number 732-609-5530

Subject RE: Fwd: Subpoena
From amuhammad@njls.com <amuhammad@njls.com>
To Arthur H. Lang <lakewoodlaw@thejnet.com>
Date 01/30/18 3:12 pm
Priority Normal



Yes personally served at 2:32pm today.

-----Original Message-----

From: "Arthur H. Lang" <lakewoodlaw@thejnet.com>
Sent: Tuesday, January 30, 2018 3:08pm
To: amuhammad@njls.com
Subject: RE: Fwd: Subpoena

Did they serve Mr finger?

On 01/29/18 5:48 pm, amuhammad@njls.com wrote:

Message received. I have advised my sever.

Thank you.

-----Original Message-----

From: "Arthur H. Lang" <lakewoodlaw@thejnet.com>
Sent: Monday, January 29, 2018 5:40pm
To: amuhammad@njls.com
Subject: RE: Fwd: Subpoena

If she goes tomorrow, then ask her to deliver the attached with the new date. Thanks.

On 01/29/18 5:06 pm, amuhammad@njls.com wrote:

Arthur,

My server did go and was advise that he was not in and that he did not have a set schedule. She did call before she went but she got voicemail.

-----Original Message-----

From: "Arthur H. Lang" <lakewoodlaw@thejnet.com>
Sent: Monday, January 29, 2018 4:44pm
To: amuhammad@njls.com
Subject: RE: Fwd: Subpoena

Is there any way I can cancel the subpoena for tomorrow. There is going to be an adjournment.

On 01/29/18 1:48 pm, amuhammad@njls.com wrote:

Hello Arthur,

I can not guarantee we can get this served today. We can definitely get it served by tomorrow.

Next day service will be \$69.00.

-----Original Message-----

From: "Arthur H. Lang" <lakewoodlaw@thejnet.com>

Sent: Monday, January 29, 2018 1:41pm

To: info@njls.com

Subject: Fwd: Subpoena

I need to serve Robert Finger, Interim Business Administrator of the
Lakewood Board of Education
200 Ramsey Avenue
Lakewood, NJ 08701

I do not know his home address.

How much will this cost and can it be done today?