

# Arthur H. Lang

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March 15, 2018

Honorable Susan M. Scarola, ALJ  
Office of Administrative Law  
Quakerbridge Plaza, Building 9  
Mercerville, NJ 08625-0049

**Re: Leonor Alcantara et. al., v. David Hesse et. al.**

OAL Docket No: EDU 11069-2014 S

Agency Ref. No. 156-6/14

Dear Judge Scarola:

Petitioners served their moving papers to the Commissioner, the Court and Respondents on March 9, 2018. Responsive papers are due on March 19, 2018. Petitioners' reply is due March 26, 2018.

The Commissioner appointed David Shafter as State Monitor in Lakewood four years ago. He reported as follows:

So, how would that affect the regular education in the District? A If cuts were made? Q If further cuts were made. Since you can't cut from special education or transportation. A Increases in class size. And possibly program cuts and other services. Q And -- And would it -- would there have been cuts in -- A Well, the area -- the area -- Q -- staff, teachers? A The areas that you can cut. Guidance. You can cut libra -- You can cut media. You can cut nursing services. And you can cut, you know, regular education. And you can cut administration. Q You can cut teachers also? A Yes. (T2 DS 29-33 to 30-14).

The State's only response to their neglect and to the harm that these cuts will cause students was to give

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Petitioners notice that *Respondents will move to dismiss*. Respondents have to be held accountable to answer for the kids.

Petitioners rushed to secure 300 pages of transcripts in order to file in time for the State and Participants to respond, for Petitioners to reply and for Your Honor to contemplate before the end of the month so that the Court will be ready to report its facts and findings in early May should the cuts be announced when it reconvenes.

No other case before the OAL will affect the future of more children in New Jersey. The argument, exhibits, and data, other than the four annual updates, have not changed since the Petition was filed. Petitioners strongly oppose granting Respondents an extension.

Respectfully Submitted,

/s/ Arthur H. Lang

Arthur H. Lang,  
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