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September 27, 2017

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

Re: Leonor Alcantara et. al., v. David Hespe et. al.

OAL Docket No: EDU 11069-2014 S

Agency Ref. No. 156-6/14

Dear Judge Scarola:

I write the Court on behalf of Petitioners in response to the recent letter by Michael Inzelbuch, Esq., on behalf of the Participant Lakewood Board of Education (hereafter BOE).

On August 14, 2017 the Petitioners, Respondents and Participants agreed to hold a conference on November 20, 2017 over the telephone because Mr. Grossman, Esq. would then be in California. Additionally, I teach in Lakewood High School and my presence in the classroom is one of the few consistencies in the lives of my students. I respectfully request to hold the conference over the telephone after school as planned so that my students do not lose a day of instruction.

Petitioners do not understand why Mr. Inzelbuch claims he is not fully aware of what has transpired. I personally hand-delivered a flash drive containing all court papers to

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Mr. Inzelbuch on August 18, 2017. At any rate, if Mr. Inzelbuch still believes his file is incomplete, he has the liberty to contact Mr. Mucciolo, Esq., or Mr. Harrison, Esq., previous counsel for the BOE.

I also remind the Court, that when the parties and participants conferred with Your Honor on August 14, 2017, the BOE was unconcerned about their availability for the agreed hearing dates because, as Mr. Mucciolo said, "the role of the Board of Education is secondary."

Petitioners are unclear as to what interests of the BOE Mr. Inzelbuch claims may be "somewhat divergent" of Petitioners. The purpose of the case is to remedy the inadequate funding for the Lakewood school district. We find it incredible that BOE takes an adversarial position or has a conflict with the interests with the children of its own district.

Petitioners are also unclear as what "significant resources and time in directions" the BOE has spent, any more than the BOE has disclosed the potential conflict between it and Petitioners. I remind the Court that Petitioners are in their fourth year of litigation. The BOE joined only last year as a participant and only after

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agreeing to Petitioners' stipulation that "the BOE will give any and all assistance to Petitioners." As far as Petitioners are concerned, any potential divergent interests were eliminated by this stipulation.

Finally, on September 19, 2017 Petitioners sent a letter to Mr. Inzelbuch, as a courtesy, to give him a "heads-up" that we were considering the *possibility* of asking him to testify. This should not have been a surprise to him as we informed him of this possibility in an email dated August 15, 2016, over a year before he became BOE counsel. Accordingly, Petitioners object to anything that upsets the schedule and delays this case. BOE is a mere participant and should not be driving the timing of the case.

Respectfully Submitted,

/s/ Arthur H. Lang

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Cc: Geoffrey Stark, Esq. (via email and regular mail)
Jennifer Hoff, Esq. (via email)
Lori Prapas, Esq. (via email)
Paul L. Tractenberg, Esq. (via email)
Daniel Grossman, Esq. (via email)
Michael Inzelbuch, Esq. (via email)
Steven Secare, Esq. (via email)