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G. MARTIN MEYERS, Esq. *
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SUSAN S. SINGER, Esq. †
JUSTIN A. MEYERS, Esq. †
† Of Counsel

August 14, 2023

VIA JEDS

Hon. David F. Bauman, Ch. J.
Superior Court, Chancery Division
71 Monument Street, Floor 2
Freehold, New Jersey 07728

**Re: Matthew J. Platkin, Attorney General of the State of New Jersey, et
al., v. Marlboro Township Board of Education, et al.
Docket No. MON-C-0078-23**

Dear Judge:

Please accept for filing the enclosed Motion to Intervene in the above referenced matter, along with the Intervenor's accompanying motions for admission *pro hac vice*.

The proposed Intervenor respectfully requests an opportunity to be heard at tomorrow's hearing, if such opportunity presents itself.

Respectfully submitted,

/s/ Justin Meyers

Justin A. Meyers (041522006)

LAW OFFICES OF G. MARTIN MEYERS, P.C.
Attorneys for Plaintiff

cc: Goldwater Institute

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**Scharf-Norton Center for Constitutional Litigation at the
GOLDWATER INSTITUTE**

Adam C. Shelton (Pro hac vice application pending)
John Thorpe (Pro hac vice application pending)
500 East Coronado Road
Phoenix, Arizona 85004
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Attorneys for Proposed Intervenor

MATTHEW J. PLATKIN, Attorney General of New
Jersey, and SUNDEEP IYER, Director, New Jersey
Division on Civil Rights,

Plaintiffs,

vs.

MARLBORO TOWNSHIP BOARD OF EDUCATION
and MARLBORO TOWNSHIP PUBLIC SCHOOL
DISTRICT,

Defendants.

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, GENERAL
EQUITY – MONMOUTH COUNTY**

DOCKET NO. MON-C-000078-23

**MOTION FOR ADMISSION *PRO HAC
VICE***

I, Justin A. Meyers, an attorney in good standing of the State of New Jersey and authorized to practice in this state, hereby move the Superior Court of New Jersey, Monmouth County, Chancery Division – General Equity in accordance with Rule 1:21-2 to permit the appearance of John Thorpe, a member of the bar of the State of Arizona, to appear *pro hac vice* in the above-captioned matter. An affidavit is attached and is relied upon in support of this motion.

I hereby certify that copies of this motion and the attached affidavit have been served upon all parties in the above-captioned matter.

RESPECTFULLY SUBMITTED this 14th day of August, 2023 by:

/s/ Justin A. Meyers

Justin A. Meyers (041522006)

LAW OFFICES OF G. MARTIN MEYERS

justin@gmeyerslaw.com

CERTIFICATE OF SERVICE

ORIGINAL E-FILED this 14th day of August, 2023, with a copy delivered via the ECF system to:

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

James R. Michael, Deputy Attorney General
124 Halsey Street, 5th Floor
Newark, New Jersey 07101
James.Michael@law.njoag.gov
Attorney for the Plaintiffs

SCHENCK, PRICE, SMITH & KING, LLP

220 Park Avenue
Florham Park, New Jersey 07932
Attorneys for Defendants,
Marlboro Township Board of Education and Marlboro
Township Public School District

/s/ Justin A. Meyers

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DISTRICT,

Defendants.

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, GENERAL
EQUITY –MONMOUTH COUNTY**

DOCKET NO. MON-C-000078-23

**AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC
VICE***

I, John Thorpe, duly sworn according to law, depose and say:

1. I am an attorney in good standing admitted to practice in the Supreme Court of the State of Arizona. My office address is 500 East Coronado Road, Phoenix, Arizona 85004; my office phone number is 602-462-5000. I am not admitted to practice in New Jersey.
2. I am associated in this matter with New Jersey counsel of record, Justin Meyers, who is qualified to practice law in this state pursuant to N.J.R. Ct. 1:21-1. The address for New Jersey counsel is 35 West Main Street, Suite 106, Denville, New Jersey 07834; the phone number is 973-625-0838.
3. Proposed Intervenor, Angela Tycenski, have requested my representation in this matter.
4. I am not now the subject of any pending disciplinary proceedings in any jurisdiction nor have I been previously in any jurisdiction.
5. There is good cause for my admission *pro hac vice* in that this case involves a complex field of constitutional law. I have experience in litigating the area of constitutional law that this lawsuit involves.
6. I will pay to the New Jersey Lawyers' Fund for Client Protection and Ethics Financial Committee the fees required by N.J.R. Ct. 1:28-2 and 1:20-1(b) within ten (10) days of the Court's granting of the Motion for Admission.
7. If this application to appear *pro hac vice* is granted, I agree to:
 - a. Abide by all applicable New Jersey court rules, including all disciplinary rules;
 - b. Consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter;

- c. Notify the Court immediately of any matter affecting my standing at the bar of any court; and
- d. Have all pleadings, briefs and other papers filed with the Court signed by the attorney

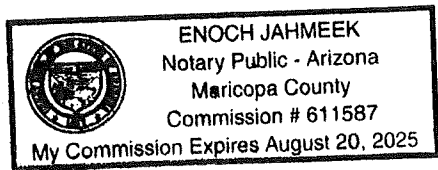
of record

John Thorpe, Esq.

8/14/2023
Date

State of Arizona)
County of Maricopa)

Subscribed and sworn before me this 14 day of August, 2023 by John Thorpe.



Enoch Jahmeek
Notary Public

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**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, GENERAL
EQUITY – MONMOUTH COUNTY**

DOCKET NO. MON-C-000078-23

**ORDER ADMITTING ATTORNEY
*PRO HAC VICE***

This matter being opened to the court by Justin Meyers, a New Jersey attorney and the attorney of record for Proposed Intervenor Angela Tycenski to permit John Thorpe, an attorney admitted to the practice of law in the State of Arizona, to participate with other counsel for Plaintiffs in all phases of the trial, and it appearing that John Thorpe is a licensed attorney in good standing in the State of Arizona and it appearing that this case involves a complex field of constitutional law in which John Thorpe is a specialist:

It is on this _____ day of _____, 20____, ORDERED that John Thorpe be and hereby is admitted *pro hac vice* and is authorized to appear and participate with other counsel for Plaintiff in all phases of the trial, subject to the following conditions:

1. John Thorpe shall abide by the *New Jersey Court Rules* including all disciplinary rules, Rule 1:20-1 and Rule 1:28-2.
2. John Thorpe shall, and hereby does, consent to the appointment of the Clerk of the Supreme Court as his agent upon whom service of process may be made for all actions against John Thorpe that may arise out of his participation in the matter.
3. John Thorpe shall immediately notify the court of any matter affecting his standing at the Bar of any other jurisdiction.
4. John Thorpe shall have all pleadings, briefs and other papers filed with the court signed by an attorney of record authorized to practice in New Jersey, who shall be held responsible for them, the conduct of the litigation and the attorney admitted herein.
5. John Thorpe cannot be designated as trial counsel.
6. No discovery, motion, trial or any other proceeding delay shall occur or be requested by reason of the inability of John Thorpe to be in attendance.

7. John Thorpe must, within ten (10) days, pay the fees required by Rule 1:20-1(b) and Rule 1:28-2 and submit an affidavit of compliance.
8. *Pro hac vice* admission will automatically terminate for failure to make the initial and any annual payment required by Rule 1:20-1(b) and Rule 1:28-2.
9. Non-compliance with any of the terms of this order shall constitute ground for removal.
10. A copy of this order shall be served on all parties within seven (7) days of the date hereof.

Judge of the New Jersey Superior Court

