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June 4, 2020

Via E-mail

Christopher Weber, Deputy Attorney General
New Jersey Office of the Attorney General
25 Market Street
P.O. Box 112
Trenton, NJ 08625

**Re: New Jersey Republican State Committee; John E. Postas, d/b/a Postas Barber Shop; 54th Street Liquor, LLC, d/b/a Eastlyn Golf Course & The Greenview Inn; Mizzitraining, LLC; and Bucket Brigade Brewery, LLC v. Philip D. Murphy, in his official capacity as Governor of the State of New Jersey; Gurbir S. Grewal, in his official capacity as Attorney General of the State of New Jersey; and Patrick H. Callahan, in his official capacity as Superintendent of the New Jersey Division of State Police and as State Director of Emergency Management
Docket No. CPM -L-000168-20**

Dear Mr. Weber:

As you are aware, this office represents the above-named individual Plaintiffs with respect to the above-captioned matter. On or about June 1, 2020, we were made aware of a startling letter that was sent by members of the New Jersey Pandemic Response Team to state Senate President, Stephen Sweeney and to the Senate Minority Leader, Senator Tom Kean. The letter states that Governor Murphy's Administration has been "making things up" as they go along, and that the Governor's decision to shutter certain businesses during the COVID-19 pandemic lacked any rational basis whatsoever.

In recognition of that aforementioned letter, as well as all related documents, will be highly relevant to this litigation, please let this correspondence serve as notice and demand that you preserve all documents related in any way to Governor Murphy's decisions to close certain businesses during the COVID-19 pandemic, while allowing others to remain open. You are directed to preserve the following specific documents and information relating to this litigation:

- Any and all documents upon which Governor Murphy, or other individuals within his Administration, relied upon in making any decision regarding the closure of any business during the COVID-19 pandemic;
- Any and all documents upon which Governor Murphy, or other individuals within his Administration, relied upon in making any decision regarding the reopening of any business during the COVID-19 pandemic;
- Any and all correspondences sent to Governor Murphy's Office or to Colonel Patrick J. Callahan by the New Jersey Department of Health between February 1, 2020 to present;
- Any and all correspondences sent to Governor Murphy's Office or to Colonel Patrick J. Callahan by the New Jersey Pandemic Response Team between February 1, 2020 to present;
- Any and all memoranda prepared by the New Jersey Department of Health between February 1, 2020 to present concerning the justification or efficacy of any Executive Order enacted by Governor Murphy;
- Any and all memoranda prepared by the New Jersey Pandemic Response Team between February 1, 2020 to present concerning the justification or efficacy of any Executive Order enacted by Governor Murphy; and
- Any and all correspondences prepared by any state agency and sent to Governor Murphy's Office or to Colonel Patrick J. Callahan between February 1, 2020 to present concerning the efficacy of any Executive Order enacted by Governor Murphy.

Please let me know if you should have any questions related to this demand for preservation.

Very truly yours,



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MTJ/tam