

this Motion, Plaintiff refers the Court to the attached memorandum of law and the Declaration of Nicholas A. Colella.

Dated: August 15, 2024

Respectfully submitted,

/s/ Nicholas A. Colella

Nicholas A. Colella

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**Pro Hac Vice*

Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATION OF CONCURRENCE

I hereby certify that I have sought concurrence with counsel for Defendant as to the relief requested in this motion, and Defendant's concurrence has been given.

/s/ Nicholas A. Colella
Nicholas A. Colella

CERTIFICATE OF SERVICE

I hereby certify that, on August 15, 2024, a true and correct copy of the foregoing was filed through the Court's Electronic Case Filing (ECF) System and that the following attorneys of record are registered to receive notice of said filing through ECF:

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/s/ Nicholas A. Colella
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