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December 10, 2007

Matt Zimmerman, Esq.
Staff Attorney
Electronic Frontier Foundation
454 Shotwell Street
San Francisco, CA 94110

Re: Township of Manalapan v. Stuart Moskovitz, Esq.
Our File No. 1158
Docket No. MON-L-2893-07

Dear Mr. Zimmerman:

I am in receipt of your letter dated December 7, 2007 threatening sanctions. It is unfortunate you persist in sending me these time-wasting, unproductive and unprofessional threats in the face of my continued professionalism towards you. Considering you have not even been admitted *pro hac vice* regarding this action, I have only offered you the utmost in professional courtesy by forwarding you papers from this action and graciously agreeing to your requests for extensions of time in complying with our subpoena.

Your repeated inappropriate characterizations that our motions are frivolous are absurd. While you claim your arguments are "slam-dunks", astute and diligent research suggests otherwise. We have reasonable and legitimate positions which we will apprise you of via the appropriate court filings and throughout future motion hearings.

Additionally your accusations that I am in violation of the Rules of Professional Conduct are wildly ill-placed and unacceptable. Pending your admission *pro hac vice*, your previous inflammatory conduct likely runs afoul of the same ethical standards you recklessly cite and propose to know so well. Further, your accusation that I have been unresponsive to your requests regarding materials our firm has filed with the court is patently false.

We refuse to engage in a protracted campaign of responding to your unproductive letter, email and telephone correspondence which futilely attempts to cow our client into abdicating its rights.

Very truly yours,

RUPRECHT, HART & WEEKS, LLP



Len M. Garza

LMG:jm

Enclosure

cc: Frank L. Corrado, Esq.
Stuart J. Moskowitz, Esq.