

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

C.P., individually and on behalf of F.P.,
a minor child; D.O. individually and on
behalf of M.O., a minor child; S.B.C.,
individually and on behalf of C.C., a
minor child; A.S., individually and on
behalf of A.A.S., a minor child; M.S.,
individually and on behalf of her minor
child, H.S.; Y.H.S., individually and on
behalf of his minor child, C.H.S.; E.M.
on behalf of her minor child, C.M.;
M.M., individually and on behalf of
K.M.; L.G., individually and on behalf
of her minor child, T.M.; E.P.,
individually and on behalf of her minor
child, Ea.P.; and on behalf of ALL
OTHERS SIMILARLY SITUATED,
Plaintiffs,

v.

NEW JERSEY DEPARTMENT OF
EDUCATION; DR. LILY LAUX,
Commissioner of Education, in her
official capacity,

Defendants.

Civil Action No. 19-cv-12807-ESK-MJS

Edward S. Kiel, U.S.D.J.

Matthew J. Skahill, U.S.M.J.

**NOTICE OF JOINT MOTION
TO AMEND CONSENT ORDER
AND REQUEST
APPOINTMENT OF SPECIAL
MASTER**

PLEASE TAKE NOTICE that, on April 6, 2026, or as soon thereafter as the Parties may be heard, the undersigned counsel for Plaintiffs and Defendants will jointly move before the Honorable Edward S. Kiel, United States District Court, Mitchell H. Cohen Building & U.S. Courthouse, 4th and Cooper Streets, Camden, New Jersey 08101 for an Order Amending the Consent Order and Settlement

Agreement approved on April 11, 2024 (ECF No. 564-3 at 31-56) and Appointing a Special Master.

In support of this Motion, the Parties will rely upon the accompanying Memorandum of Law and the Declaration of Catherine Merino Reisman and Exhibits thereto.

A proposed form of Order approving the manner and form of notice to the Rule 23(b)(2) Class, a proposed form of Order approving the Amended Consent Order and Settlement Agreement, and a proposed form of Order appointing the Honorable Jaynee LaVecchia (Ret.) as a Special Master are attached hereto.

Respectfully submitted,

CLASS COUNSEL

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CERTIFICATE OF SERVICE

I, Catherine Merino Reisman, certify that, on March 13, 2026, I filed the following documents on the ECF system, serving all counsel of record:

- Notice of Motion to Amend Consent Order and Settlement Agreement and Request Appointment of a Special Master
- Memorandum of Law in Support of Motion to Amend Consent Order and Settlement Agreement and Request Appointment of a Special Master
- Declaration of Catherine Merino Reisman in Support of Motion to Amend Consent Order and Settlement Agreement and Request Appointment of a Special Master
 - Exhibit 1 to Declaration: Amended Consent Order
 - *Exhibit A to Amended Consent Order: Original Consent Order*
 - *Exhibit B to Amended Consent Order: Final Compliance Report #4*
 - Exhibit 2 to Declaration: October 20, 2025 Correspondence to NJDOE
 - Exhibit 3 to Declaration: Summary of Experience of the Honorable Jaynee LaVecchia (Ret.)
 - Exhibit 4 to Declaration: Proposed Notice
- Proposed Order Approving Form and Manner of Notice to Rule 23(b)(2) Class
- Proposed Order Approving Amended Consent Order
- Proposed Order Appointing the Honorable Jaynee LaVecchia (Ret.) as Special Master

Dated: March 13, 2026

/s/ Catherine Merino Reisman
Catherine Merino Reisman