

PLAINTIFF'S REPLY to REQUEST  
for SUR-REPLY

Kenneth Frank Irek, *Plaintiff*

v.

New Jersey Lawyers' Fund  
For Client Protection, *Defendant*

and

The Supreme Court of New Jersey, *Defendant*

Superior Court of New Jersey  
Mercer County  
Law Division  
Docket No. MER-L-002022-20  
File Date: 12/15/2020

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December 15, 2020

The Honorable Douglas H. Hurd, P. J. Cv.  
Mercer County Superior Court  
175 S Broad St., PO Box 8068  
Trenton, NJ 08650-0068  
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Filed via ECourts, Served by Email

Re: KENNETH FRANK IREK  
vs: NEW JERSEY LAWYERS' FUND FOR CLIENT PROTECTION  
and  
THE SUPREME COURT OF NEW JERSEY  
Docket # MER-L-002022-20  
MOTION FOR INJUNCTIVE RELIEF TEMPORARY RESTRAINTS

Dear Judge Hurd:

Please allow this letter to serve as a response to Defendants counsel's, in the above-captioned matter, request for discretionary permission to file a sur-reply to Plaintiff's Reply to their Cross-Motion to dismiss, which was filed yesterday.

R. 1:6-3 (a) authorizes the filing of motions and replies to motions, and that 'No other papers may be filed without leave of court.' Plaintiff's understanding of this section is that the court must retain control of motions and not allow unfettered filing of replies and responses to replies and responses to responses to replies, etc.

Defendants initiated the Cross-Motion and had the opportunity to clearly state their position and support it with existing materials contained in Plaintiff's Verified Complaint and Motion for Injunctive Relief, and proffer their legal conclusions.

