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September 20, 2023

Via JEDS and aala.khan@njcourts.gov  
Honorable Paula T. Dow, P.J.Ch.  
Olde Courthouse, First Floor  
120 High Street  
Mount Holly, NJ 08060

*Re: Plaintiffs, Lorraine Pratt and Melanie Long individually and on behalf of all Rittenhouse Park Community Association, Inc. owners and others similarly situate v. Rittenhouse Park Community Association, Inc. et al.  
Docket No. BUR-C-62-23*

Dear Judge Dow:

Please be advised I represent the Defendant, Rittenhouse Park Community Association, Inc. ("Association") in the above-captioned matter. Please accept this Certification of Michael S. Simone, Esquire in response to Plaintiff's Certification of Lorraine Pratt filed September 20, 2023.

Thank you for your attention and consideration in this matter.

Respectfully,

Michael S. Simone

MSS/eay

cc: Paul Leodori, Boudwin Ross Roy Leodori PC. (via JEDS)  
Rittenhouse Park Community Association, Inc.

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 Attorney for Defendant, Rittenhouse Park Community Association, Inc.

LORRAINE PRATT and MELANIE LONG,  
 Individually and on behalf of all Rittenhouse  
 Park Community Association, owners and  
 others similarly situate,

Plaintiff,

vs.

RITTENHOUSE PARK COMMUNITY  
 ASSOCIATION, INC., and UNKNOWN  
 PAT DOES 1-20,

Defendant.

SUPERIOR COURT OF NEW JERSEY  
 BURLINGTON COUNTY  
 CHANCERY DIVISION

DOCKET NO.: C-000062-23

Civil Action

**CERTIFICATION OF MICHAEL S.  
 SIMONE, ESQ. IN OPPOSITION  
 TO ORDER TO SHOW CAUSE  
 WITH TEMPORARY RESTRAINTS  
 IN THE FORM APPOINTING AN  
 ELECTION MASTER TO  
 CONDUCT RITTENHOUSE PARK  
 COMMUNITY ASSOCAITION,  
 INC. BOARD OF TRUSTEES  
 ELECTION IN CONFORMANCE  
 WITH APPLICABLE STATUTES  
 AND REGULATIONS**

The following certification is made in support of Defendant's Opposition to Plaintiff's Order to Show Cause with Temporary Restraints:

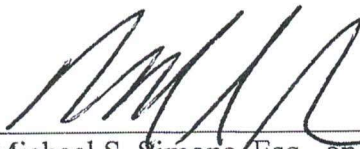
1. I, Michael S. Simone, Esquire, on behalf of Rittenhouse Park Community Association, Inc., the Defendant in this matter, attest the following statements.
2. On Monday, September 11, 2023, I had discussions with the Property Manager and President about potential postponements of the election.
3. On Tuesday, September 12, 2023, I spoke with the Property Manager and President and verbally agreed to postpone the election. I further presented time lines for new notices and the new election date in November.

4. On Wednesday, September 13, 2023, I sent proposed language for the new election notices. On the same day, my office received Plaintiff's Order to Show Cause.
5. On Thursday, September 14, 2023, a sign was posted regarding the postponement of the election.
6. Based on the above, I did not misrepresent the timeline to any board members or the Court. Again, the decision had been made to postpone the election prior to the Plaintiff filing the Order to Show Cause.
7. I have no allegiance to any board member and only want the best for Rittenhouse Park Community Association, Inc.
8. I have represented Rittenhouse Park Community Association, Inc. since 2007. I have assisted the Association in various matters over the years including but not limited to collections, by-law changes, attending board meetings and assisting in various litigation over the years.
9. As a result, I have worked with various board members since that time and my goal is only to have elections open so that the community can elect the next board members free from controversy.
10. The presented guidelines and three (3) member election board can ensure elections are handled properly along with the proposed Memo to be sent out to all residents regarding the election process.
11. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

9/20/2023

By:

  
Michael S. Simone, Esq., on behalf of  
Rittenhouse Park Community Association, Inc.