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VIA ECF ONLY

The Hon. Zahid N. Quraishi, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

**Re: Kim, et al. v. Hanlon, et al.
Civil Action No. 3:24-cv-01098-ZNQ-TJB**

Dear Judge Quraishi:

I represent Patricia Campos-Medina, a candidate for the United States Senate in the upcoming election, in this matter. To date, Ms. Campos-Medina has not filed a motion to intervene in the case because she believes that her interest is protected by Congressman Kim, as she was one of the parties who signed the joint letter with Congressman Kim and Larry Hamm asking the various county clerks to utilize the “office block” ballot design, which was marked as Exhibit D-1 in the evidentiary hearing the Court held. Nevertheless, we have been alerted to the letter submitted by the Burlington County Clerk and wish to respond. (ECF #174).

We dispute that any “paradigm shift in the election” has occurred, as asserted by the Burlington County Clerk. The same immediate irreparable harm that Ms. Campos-Medina will suffer if compelled to compete under the county line system still exists today, as it did yesterday. And if a statute was unconstitutional yesterday, it is still unconstitutional today. The fact of whether one candidate has dropped out does not change the legal reality that this is an unconstitutional system, and candidates should not be forced to compete in it for yet another cycle. Just as “justice delayed is justice denied,” the time for legal equality under the law is always right now.

Moreover, many candidates like Ms. Campos-Medina are even more harmed today than yesterday. Before, there was at least theoretically a process by which candidates could compete for

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the county lines, albeit less of a competition in some counties more than others. Now, assuming without conceding the accuracy of Mr. Natale's claim, Congressman Kim has "accepted" the lines in "all" counties, this leaves Ms. Campos-Medina, and any other Senate candidate, without an opportunity to compete for them. Any semblance of due process has gone out the window. For the Court to sanction this type of gamesmanship would be untenable. Ms. Campos-Medina submits that this situation only further demands the Court's immediate action, as it has truly highlighted the inequities in the system.

We appreciate Your Honor's continued attention to this matter. Should the Court wish for any additional information or argument from Ms. Campos-Medina, we welcome the opportunity.

Respectfully submitted,

/s/ Scott D. Salmon, Esq.
Scott D. Salmon, Esq.