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*Attorneys for Defendant
New Jersey Sports and Exposition Authority*

BOROUGH OF PARAMUS,

Plaintiff,

v.

AMEREAM, LLC; NEW JERSEY
SPORTS AND EXPOSITION
AUTHORITY; BOROUGH OF EAST
RUTHERFORD; and COUNTY OF
BERGEN,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CIVIL PART
BERGEN COUNTY

DOCKET NO.: BER-L-5762-25

Civil Action

**NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

TO: Richard Malagiere, Esq.
The Law Offices of Richard Malagiere
250 Moonachie Road, Third Floor
Moonachie, New Jersey 07074
Attorney for Plaintiff

PLEASE TAKE NOTICE that on Friday, January 30, 2026, or as soon thereafter as counsel may be heard, Defendant the New Jersey Sports and Exposition Authority (the "Authority") shall move before the Superior Court of New Jersey, Law Division, Bergen County, for the entry of an Order dismissing Counts I, II, and IV of the Borough of Paramus's ("Plaintiff") Complaint as against the Authority with prejudice pursuant to Rule 4:6-2(e).

PLEASE TAKE FURTHER NOTICE that this Motion is made pursuant to Rule 1:6-2, and the Court, in its discretion, may enter the proposed form of Order submitted herewith if you

do not object in writing to both the Clerk of the Court and the moving party within eight (8) days prior to the return date of the instant motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the Authority shall rely upon this Notice and accompanying Memorandum of Law in Support of the Authority's Motion to Dismiss Plaintiff's Complaint, and the Certification of Kevin W. Weber, Esq. submitted herewith, as well as other pleadings on file in this matter.

PLEASE TAKE FURTHER NOTICE that neither a discovery end date nor a trial date has been scheduled in this matter.

PLEASE TAKE FURTHER NOTICE that the Authority hereby requests oral argument if timely opposition is submitted by the Plaintiff.

Dated: December 22, 2025

By: /s/ Frederick W. Alworth

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