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Request for comment

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Cc: Hillary Goldberg <hillarygoldberg@yahoo.com>

Tue, May 30, 2023 at 4:40 PM

Hi there:

This is John Coyle, counsel for Ms. Goldberg.

When Wayne Puppies was not able to open up in Teaneck, it filed this frivolous lawsuit against Ms. Goldberg, the Town, and others. Against Ms. Goldberg, the Complaint claims she defamed it by calling Wayne Puppies a "puppy mill."

However, counsel for Wayne Puppies admitted that at no point in the Change.org petition did Hillary Goldberg actually say that Wayne Puppies was a puppy mill. Despite this, he argued to the Court that people who read the petition would have thought she meant it about Wayne Puppies and the motion to dismiss was denied.

It is undisputed that the New Jersey Attorney General found that Wayne Puppies committed 27 violations of the Pet Purchase Protection Act for its failure to adhere to laws designed to protect consumers from purchasing unhealthy pets.

The truth is the ultimate defense in a defamation action. We fully expect Ms. Goldberg and <u>all defendants</u> to be vindicated and this frivolous lawsuit to ultimately be dismissed.

John D. Coyle, Esg.

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