

**Stephen J. Edelstein, Esq., I.D. No.: 285031972**  
**WEINER LAW GROUP LLP**  
**629 Parsippany Road**  
**P.O. Box 438**  
**Parsippany, NJ 07054-0438**  
**Phone: (973) 403-1100 Fax: (973) 403-0010**  
**Attorneys for Defendants**  
**Teaneck Board of Education, Sebastian Rodriguez, Victoria Fisher**  
**Edward Ha, Nadia Hosein, Dennis Klein, Kassandra Reyes,**  
**Jonathan Rodriguez, Denise Sanders, and Clara Williams**  
**Our File No.: TEA015**  
5047042v1

KEITH KAPLAN,  
  
*Plaintiff,*  
  
vs.  
  
TEANECK BOARD OF EDUCATION,  
SEBASTIAN RODRIGUEZ, VICTORIA  
FISHER, EDWARD HA, NADIA HOSEIN,  
DENNIS KLEIN, KASSANDRA REYES,  
JONATHAN RODRIGUEZ, DENISE  
SANDERS, AND CLARA WILLAMS,  
  
*Defendants.*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – BERGEN COUNTY  
DOCKET NO.: BER-L-000121-24

Civil Action

**CERTIFICATION OF  
STEPHEN J. EDELSTEIN, ESQ.**

I, Stephen J. Edelstein, Esq., an attorney at law of the State of New Jersey, do hereby state upon my oath as follows:

1. I am a partner of the law firm of Weiner Law Group, LLP, attorneys for Defendants, Teaneck Board of Education, Sebastian Rodriguez, Victoria Fisher, Edward Ha, Nadia Hosein, Dennis Klein, Kassandra Reyes, Jonathan Rodriguez, Denise Sanders, and Clara Williams in this matter.

2. I am fully familiar with the facts contained herein. I make this Certification in opposition to the first of Plaintiff's two (2) Notices of Motion to Enforce Litigant's Rights, filed on August 20, 2024 and August 23, 2024, respectively.

3. With regard to the August 20 Motion, on or about July 18, 2024, Hon. Carol V. Novey Catuogno, A.J.S.C., issued an Order relative to the Plaintiff's Verified Complaint and Order to Show Cause.

4. Pursuant to the Court's July 18, 2024 Order, Defendant was to reimburse Plaintiff the amount of \$400.00 within thirty (30) days of the Order. It was Defendant's intention to discuss and resolve this payment to Plaintiff at the following Regular Public Meeting to be held on August 21, 2024.

5. Nevertheless, at 12:02 a.m. on August 20, 2024, literally two minutes after the payment was due, Plaintiff filed a Notice of Motion to Enforce Litigant's Rights, even though he was well aware that the Board had a meeting scheduled for August 21, 2024, which was the earliest date on which the payment could have been approved.

6. Nonetheless, to avoid conflict, upon receipt of the Motion, our office immediately remitted payment in the amount of \$400.00 to Plaintiff as required by the Court's July 18, 2024 Order.

7. Despite Defendant's payment to Plaintiff consistent with the Court's July 18, 2024 Order, Plaintiff refuses to withdraw his Notice of Motion.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

  
\_\_\_\_\_  
Stephen J. Edelstein, Esq.

Dated: September 5, 2024