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February 8, 2016

The Honorable Renée Marie Bumb, U.S.D.J.
Mitchell F. Cohen U.S. Court House
One John F. Gerry Plaza
4th and Cooper Streets
Camden, NJ 08101

Re: Nanticoke Leni-Lenape Tribal Nation v.
John Jay Hoffman Acting Attorney General of New
Jersey in his official capacity
Docket No. 15-cv-5645-RMB-JS

Dear Judge Bumb:

I write on behalf of our client the Nanticoke Leni-Lenape Tribal Nation ("Nation") to request the Court's assistance. This matter is currently before the Court on Defendant's motion to Dismiss the Nation's First Amended Complaint.

The Nation's First Amended Complaint alleges that the New Jersey Attorney General's unilateral attempts to undermine the Nation's status as a state-recognized tribe conveyed by the legislature thirty-four years ago violates the Nation's Constitutional rights to procedural and substantive due process, and to equal protection. The Nation alleges that it has suffered and continues to suffer immediate and irreparable harm as a result of these violations.

Recently, a federal agency has notified the Nation that the long-held status of its tribal 8(a) entity, NLT Management

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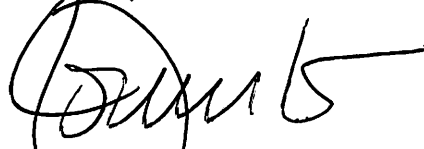
Services, was being called into question.¹ The agency warned the Nation that it needed to confirm NLT's status with the SBA to avoid immediate termination of the federal contract currently in place between the agency and NLT. A copy of this communication is attached. The Nation's members rely heavily on the employment opportunities created by its 8(a) contracts for their livelihood and dozens of jobs are in immediate peril, along with the numerous other immediate harms articulated in the Court filings.

We appreciate that the Court has a crowded calendar and a heavy caseload to manage. The Nation respectfully requests that the Court give its prompt attention to this case so that the economic fate of the Nation may be timely clarified. We have apprised opposing counsel of this latest indication of the urgent need for resolution of this matter and of our intention to send this letter.

Thank you for your consideration.

Respectfully submitted,

BARRY, CORRADO & GRASSI, PC



Frank L. Corrado
Greg Werkheiser, and L. Eden Burgess
Counsel to Nanticoke Leni-Lenape
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FLC/sh

cc: Stuart Feinblatt, Assistant Attorney General

¹ A tribal 8(a) entity, such as NLT, is a tribally owned disadvantaged small business certified as such by the Small Business Administration (SBA). A tribally owned business means any business that is at least 51% owned by an Indian tribe, and an Indian tribe is any Indian tribe, band, or nation recognized as eligible for the federal programs and services provided to Indians because of their status as Indians or recognition as such by the State in which the tribe, band, or nation resides.