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ATTORNEY FOR PETITIONER

IN RE THE 2019 MUNICIPAL GENERAL  
ELECTION FOR THE OFFICE OF  
TOWNSHIP COMMITTEE OF THE  
TOWNSHIP OF HOLMDEL, IN THE  
COUNTY OF MONMOUTH, IN THE  
STATE OF NEW JERSEY

CHIUNG-YIN CHENG LIU,

Petitioner,

v.

HON. MARY DESARNO, in her  
official capacity as Superintendent of  
Elections of the County of Monmouth;  
HON. CHRISTINE G. HANLON, in her  
official capacity as County Clerk of the  
County of Monmouth; WENDY  
PATROVICH, in her official capacity as  
Township Clerk of the Township of  
Holmdel; MONMOUTH COUNTY BOARD  
OF ELECTIONS; and PRAKASH  
SANTHANA, in his capacity as a  
Candidate for Township Committee of the  
Township of Holmdel, and JOHN DOES 1-  
5,

Respondents.

SUPERIOR COURT OF NEW JERSEY  
MONMOUTH COUNTY: LAW DIVISION

Docket Number: MON-L-4429-19

**AMENDED VERIFIED PETITION FOR  
ELECTION CONTEST PURSUANT TO  
N.J.S.A. 19:29-1, ET SEQ.**

Petitioner, Chiung-Yin Cheng Liu ("Petitioner" or "Liu"), residing at 3 Seven Oaks Drive, in the Township of Holmdel, in the County of Monmouth, in the State of New Jersey, by way of Verified Petition and pursuant to statute, alleges and says:

1. Petitioner is, and all times hereinafter mentioned was, a citizen of the United States, and a candidate for the office of Township Committee of the Township of Holmdel, Monmouth County, New Jersey.

2. This Verified Complaint is made pursuant to N.J.S.A. 19:29-1 to contest the results of the November 5, 2019 General Election ("Election") for the position of Township Committee of the Township of Holmdel ("Township") in the County of Monmouth ("County").

3. Pursuant to Court Order dated November 20, 2019, in the matter of a Petition to Recheck Voting Machines and Recount Paper Ballots of the November 5, 2019 General Election for Holmdel Township Committee, docket number MON-L-4099-19, on December 5, 2019, the Monmouth County Board of Elections ("Monmouth County BOE") conducted a recount and recheck of the results of the Election for Township Committee (the "Recount").

4. The result of the Recount was certified by the Clerk of Elections on or about November 6, 2019.

#### **THE PARTIES**

5. Respondent, the Hon. Mary DeSarno, is, and at all times hereinafter mentioned was, the Superintendent of Elections of the County of Monmouth (the "Superintendent"), and is named in her official capacity. At all times relevant herein, the Superintendent, in her official capacity, maintains custody and control of the voting machines and ballots utilized in the Election. Superintendent DeSarno has been named as a Respondent in this case only because she has such custody and control of said voting machines and ballots.

6. Respondent, the Hon. Christine G. Hanlon, is, and at all times hereinafter mentioned was, the County Clerk of the County of Monmouth, and is named in her official capacity. Clerk Hanlon has been named a Respondent in this case only because the conducting of this Election and all elections within the County falls within the jurisdiction of her office.

7. Respondent, Wendy Patrovich, is, and at all times hereinafter mentioned was, the Clerk of the Township of Holmdel, and is named in her official capacity only, because of the conducting of this Election and all elections within the Township falls within the jurisdiction of her office.

8. Respondent, Monmouth County BOE, is, and at all times hereinafter mentioned was, a four-person county entity comprised of two Republican and two Democratic representatives who serve as Commissioners. The Monmouth County BOE is, and at all times hereinafter mentioned was, responsible for, among other things, receiving, canvassing, counting and recounting mail-in ballots and provisional ballots, and checking and rechecking voting machine votes. At all times relevant herein, the Monmouth County BOE was responsible for certifying the results of, among other elections, the 2019 General Election for the Township.

9. At all times relevant herein, the Monmouth County BOE, is the custodian of the mail-in ballot applications, envelopes, mail-in ballots, emergency ballots, provisional ballots, affirmations and envelopes, and other paraphernalia associated with those documents.

10. Respondent, Prakash Santhana ("Santhana"), is, and at all times hereinafter mentioned was, one of the officially recognized Independent candidates for

election to the Township Committee of the Township of Holmdel and is named in that capacity.

**NOVEMBER 5, 2019 HOLMDEL TOWNSHIP GENERAL ELECTION**

11. On November 5, 2019, a General Election was held for, among other offices, the Township Committee for the Township of Holmdel.

12. At the time and place of the Election, Petitioner was one of two officially recognized Republican candidates for election to the Township Committee. The other Republican Candidate was Eric Hinds.

13. At the time and place of the Election, Santhana and Cathy Webber were the two officially recognized Independent candidates for election to the Township Committee.

14. On the day of the Election, ballots were cast in several voting machines in several voting districts within the Township. Voting was also cast via mail-in ballot and provisional ballot.

15. Following the counting of provisional ballots after the Election, Monmouth County BOE released the unofficial and uncertified report of machine votes, mail-in ballots and provisional ballots in the Election. Said unofficial and uncertified report demonstrated that the following votes were cast:

Chiung-Yin Cheng Liu	2,082
Eric Hinds	2,063
Cathy Webber	2,164
Prakash Santhana	2,079

16. In other words, following the General Election, Liu had three more votes than Santhana.

17. Pursuant to Court Order, on December 5, 2019, the Monmouth County BOE conducted a recheck of machine votes and recount of mail-in ballots and provisional ballots. As a result of the recount, the unofficial and uncertified results of the election were:

Chiung-Yin Cheng Liu	2,085
Eric Hinds	2,066
Cathy Webber	2,170
Prakash Santhana	2,087

18. In other words, following the Recount, Liu now has two less votes than Santhana.

#### **Provisional and 48-Hour Vote-by-Mail Ballots**

19. Nine (9) provisional and 48-Hour vote-by-mail ballots were received by the BOE in connection with the Election. At this time, the identity of these voters is not known.

20. One provisional ballot was voided on the basis that it was an overvote. However, the voter clearly cast a vote for Liu and, in an obvious display of emphasis for her support of Liu, also wrote in Liu's name in the personal choice column on the provisional ballot.

21. Despite the fact that the voter's intent was clear, the BOE improperly voided this provisional ballot as an overvote, which should have been counted.

22. One of the 48-hour ballots received contained a vote for both Liu and Hinds. The BOE failed to count the vote for Liu, and only counted the vote for Hinds, on the basis that the voter hand-wrote an "X" next to Liu's name on the ballot. However, the "X" on the ballot did not obstruct Liu's name or any part of the oval.

23. Despite the fact that the voter clearly intended to cast a vote for Liu by filling in the oval next to her name, the BOE improperly failed to count that vote by erroneously interpreting the voter's intent as a cancellation of that vote when the "X" placed on the ballot did not obstruct anything. This vote for Liu should have been counted.

#### **REJECTED VOTE-BY-MAIL BALLOTS – SIGNATURE MATCHING**

24. In connection with the Election, the BOE voided ten (10) vote-by-mail ("VBM") ballots for perceived signature matching issues.

25. Dolores Lucarelli is a registered voter in the Township of Holmdel and cast a VBM balloted in the Election, which was timely received by the BOE.

26. The VBM ballot was mailed to Ms. Lucarelli's residence in Holmdel, New Jersey and was completed by Ms. Lucarelli with the assistance of her son, who completed the assistor portion of the ballot.

27. Dolores Lucarelli actually signed the VBM ballot submitted in the Election. However, the BOE improperly rejected Ms. Lucarelli's ballot and failed to count her vote on the basis that the signature on the VBM ballot did not match the signature on the VBM application, which was filed in 2016. This voter has been unlawfully disenfranchised as the result of a perceived technicality and this vote should have been counted by the BOE.

28. Alexandra Murray is a registered voter in the Township of Holmdel and cast a VBM balloted in the Election, which was timely received by the BOE.

29. The ballot was mailed to Ms. Murray's residence in Holmdel, New Jersey and was completed by Ms. Murray.

30. Alexandra Murray actually signed the VBM ballot submitted in the Election and her vote should have been counted by the BOE.

31. However, the BOE improperly rejected Ms. Murray's ballot and failed to count her vote on the basis that the signature on the VBM ballot did not match the signature on the VBM application. This voter has been unlawfully disenfranchised as the result of a perceived technicality and this vote should have been counted by the BOE.

32. Michael A. Lupo, Jr. is a registered voter in the Township of Holmdel and cast a VBM balloted in the Election, which was timely received by the BOE.

33. The ballot was mailed to Mr. Lupo's college residence in Pennsylvania and was completed by Mr. Lupo.

34. Mr. Lupo actually signed the VBM ballot submitted in the Election and his vote should have been counted by the BOE.

35. However, the BOE improperly rejected Mr. Lupo's ballot and failed to count his vote on the basis that the signature on the VBM ballot did not match the signature on the VBM application. This voter has been unlawfully disenfranchised as the result of a perceived technicality and this vote should have been counted by the BOE.

#### **REJECTED VOTE-BY-MAIL BALLOTS – INDETERMINATE POSTMARK**

36. In connection with the Election, the BOE voided one (1) VBM ballots on the basis that the postmark was "indeterminate." That ballot belonged to Donna Carannante, a registered voter in the Township of Holmdel.

37. Donna Carannante deposited her VBM ballot in the mail prior to election day. There is no dispute that Ms. Carannante's ballot was timely received by the BOE.

38. However, the BOE improperly rejected Ms. Carannante's ballot and failed to count her vote on the basis that the date of the postmark could not be determined. The BOE's inability to determine the postmark when the ballot was timely received should not have resulted in the rejection of this ballot and should have been resolved in favor of the voter, who has been unlawfully disenfranchised as the result of a perceived technicality.

#### **REJECTED VOTE-BY-MAIL BALLOTS – MAIL ISSUES**

39. In connection with the Election, the BOE voided eight (8) VBM ballot on the basis that the ballot was allegedly postmarked after November 5, 2019. Included in this group of voided ballots were ballots cast by Kimberly B. Costello, James J. Costello, Dominick J. Arena, Daniel Graw and Faith Renna.

40. All of the voters noted in the Paragraph 39 deposited their VBM ballots in the mail on or before close of business on November 5, 2019.

41. All of the ballots cast by the voters referenced in Paragraph 39 were timely received by the BOE.

42. However, for unknown reasons, all of the ballots cast by the voters referenced in Paragraph 39 were erroneously postmarked November 6, 2019 by the United States Postal Service ("USPS") despite the fact that they were deposited in the mail prior to November 5, 2019.

43. The error in the postmarking of these ballots is confirmed by the fact that the BOE stamped each of these ballots received on November 7, 2019. It is impossible



for the ballots to have been postmarked on November 6, 2019 and received the next day on November 7, 2019.

44. The BOE improperly rejected these ballots and failed to count the votes associated with them based upon a clear error committed by the USPS through no fault of the voter. An error committed by a third-party over whom the voter has no control should not have resulted in the rejection of these ballots and should have been resolved in favor of the voters, who have been unlawfully disenfranchised.

45. In connection with the Election, the BOE voided thirty-one (31) VBM ballot on the basis that the ballot was not received within the 48-hour period following the close of polls on November 5, 2019.

46. For reasons unknown, the USPS timely postmarked many VBM ballots that were deposited in the mail prior to November 5, 2019, but failed to deliver those ballots in a timely manner.

47. For example, Paige Fontana is a registered voter in the Township of Holmdel and deposited her VBM ballot in the mail prior to election day, as evidenced by the fact that it was postmarked during the month of October.

48. For reasons unknown and certainly outside the voter's control, the USPS either did not deliver the ballot in a timely manner and/or the BOE did not mark this ballot received until November 12, 2019.

49. It is impossible that Ms. Fontana's ballot would not have been delivered timely if it was postmarked in October.

50. Similarly, ballots cast by Andrew Buonguro, Carolyn Ruggiero, Leslie Foster, Brian Foster, Thomas Woods, April Licato, Alex Licato and Alexander Lambros

were deposited in the mail and/or postmarked on or before November 5, 2019, but for reasons unknown and certainly outside the voters' control, the USPS either did not deliver the ballot in a timely manner and/or the BOE did not mark this ballot received until after the close of the 48-hour period.

51. The BOE improperly rejected these ballots and failed to count the votes associated with them based upon a clear error committed by the USPS through no fault of the voter. An error committed by a third-party over whom the voter has no control should not have resulted in the rejection of these ballots and should have been resolved in favor of the voters, who have been unlawfully disenfranchised.

52. As this election was decided by two (2) votes, the votes identified in this Complaint number more than two and should have been counted, these votes could change the outcome of the Election.

53. Thus, as legal votes cast were improperly rejected by the Monmouth County BOE, and, as such votes could change the results of the Election, pursuant to N.J.S.A. 19:29-1(f) and (g), this Court must order that the votes identified in this Complaint be counted.

54. Petitioner hereby reserves the right to supplement, amend and plead additional claims as they arise pursuant to N.J.S.A. 19:29-5.

55. Petitioner therefore demands that an election contest be ordered and commenced in accordance with the provisions of N.J.S.A. 19:29-1 et seq.

#### **ILLEGAL VOTES RECEIVED**

56. In connection with the Election, the Petitioner has become aware of eight (8) illegal votes received and counted by the BOE.

57. Carole Balmer cast a vote in the Election but does not reside in Holmdel.

58. Ms. Balmer has resided at an extended living facility in the Township of Middletown for more than six months preceding the Election. Therefore, Ms. Balmer was not eligible to vote the Election

59. Alana DiMaso cast a vote in the Election but does not reside in Holmdel.

60. Ms. DiMaso has resided in Boston, Massachusetts for more than six months preceding the Election. Therefore, Ms. DiMaso was not eligible to vote in the election.

61. Matthew DiMaso cast a vote in the Election but does not reside in Holmdel.

62. Mr. DiMaso has resided in Hoboken, New Jersey or in the State of Pennsylvania for more than six months preceding the Election. Therefore, Mr. DiMaso was not eligible to vote in the election.

63. Rocco A. Pascucci cast a vote in the Election but does not reside in Holmdel.

64. Mr. Pascucci has resided in the State of New York for more than six months preceding the Election. Therefore, Mr. Pascucci was not eligible to vote in the election.

65. Judith Pascucci cast a vote in the Election but does not reside in Holmdel.

66. Ms. Pascucci has resided in North Brunswick, New Jersey for more than six months preceding the Election. Therefore, Ms. Pascucci was not eligible to vote in the election.

67. Chris Fazio cast a vote in the Election but does not reside in Holmdel.

68. Mr. Fazio has resided in the State of California for more than six months preceding the Election. Therefore, Mr. Fazio was not eligible to vote in the election.

69. Julia Vitale cast a vote in the Election but does not reside in Holmdel.

70. Ms. Vitale has resided in the Union, New Jersey for more than six months preceding the Election. Therefore, Mr. Vitale was not eligible to vote in the election.

71. Karen Nici cast a vote in the Election but does not reside in Holmdel.

72. Ms. Nici has resided in the Hoboken, New Jersey for more than six months preceding the Election. Therefore, Mr. Nici was not eligible to vote in the election.

73. The BOE improperly counted the votes of Ms. Balmer, Ms. DiMaso, Mr. DiMaso, Mr. Pascucci, Ms. Pascucci, Mr. Fazio, Ms. Vitale and Ms. Nici in this election.

**WHEREFORE**, Petitioner prays, in accordance with the provisions of N.J.S.A. 19:29-1, et seq., as follows:

a. That the Court enter an Order setting a suitable time and place for a hearing to review the objections set forth herein, not more than thirty (30) days or less than fifteen (15) days after the filing of this Verified Petition pursuant to N.J.S.A. 19:29-4;

b. That the Court designate a Judge of the Superior Court assigned to Monmouth County to hear and determine this case;

c. That at the hearing, the Court determine the legality of any voters or votes that were cast, accepted, counted, and recounted or rejected in the Township of Holmdel 2019 Municipal General Election and such Other grounds, such as requiring any voter to appear, provide testimony, and disclose for whom

he or she voted, pursuant to N.J.S.A. 19:29-6 and -7, and any other claims and issues as may be presented at trial, and issue a ruling on said claims and issues;

d. That the Court, after the hearing, annul the certificate of election and declare Petitioner duly elected to the Township of Holmdel Committee pursuant to N.J.S.A. 19:29-8 to -10;

e. That the Court, after the hearing, enter an Order under seal of the Court to the Sheriff of the County of Monmouth placing Petitioner, as the successful party, in possession of the office of Township Committee of the Township of Holmdel without delay pursuant to N.J.S.A. 19:29-10 and removing Santhana if Santhana is installed and sworn in;

f. That the parties or their representatives, before the date set for hearing in this case, shall be allowed to review, examine and photocopy all books, papers, tallies, ballots, applications, envelopes, envelope flaps, signature copy registers, voting authorizations, messenger books, rejected absentee ballots, rejected mail-in ballots, rejected provisional ballots, and any other election materials, records, reports, receipts, or any other documents or election paraphernalia at any time during the pendency of this case provided said examination occurs on one (1) day's notice to all interested parties and in the presence of the appropriate officials;

g. That the parties or their representatives, before the date set for hearing in this case, shall be empowered and permitted to photocopy any and all election materials, documents, mail-in applications, mail-in ballots, mail-in ballot materials and documents, machine ballots, emergency ballots and emergency ballot

materials, provisional ballots and provisional ballot materials, affirmations, affidavits, and envelopes, returned sample ballots and all other records and documents.

**RULE 4:5-1 CERTIFICATION**

I certify that this matter is the subject of a previously filed matter entitled Petition to Recheck Voting Machines and Recount Paper Ballots of the November 5, 2019 General Election for Holmdel Township Committee, docket number MON-L-4099-19.

**DESIGNATION OF TRIAL COUNSEL**

Petitioner designates Richard Sanvenero Jr., Esq. as trial counsel in this action.

**Law Office of Timothy F. McGoughran, LLC**  
Attorneys for Petitioner  
Chiung-Yin Cheng Liu

By: \_\_\_\_\_

Richard Sanvenero Jr., Esq.

Dated: \_\_\_\_\_

2-14-2020

**VERIFICATION**

I, Chiung-Yin Cheng Liu, being duly sworn, depose and say that I have read the foregoing Amended Complaint and know the contents thereof. The statements contained in the Complaint are true to the best of my personal knowledge.



Chiung-Yin Cheng Liu

Sworn to and subscribed before me this

14<sup>th</sup> day of February, 2020



Notary Public

**RICHARD SANVENERO, JR.  
ATTORNEY AT LAW  
STATE OF NEW JERSEY**

**LAW OFFICE OF TIMOTHY F. McGOUGHRAN, LLC***Richard Sanvenero, Jr., Esq.* #063352014

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**ATTORNEY FOR PETITIONER**

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SANTHANA, in his capacity as a  
Candidate for Township Committee of the  
Township of Holmdel, and JOHN DOES 1-  
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Respondents.

SUPERIOR COURT OF NEW JERSEY  
MONMOUTH COUNTY: LAW DIVISION

Docket Number: MON-L-4429-19

**CONSENT ORDER TO FILE AMENDED  
COMPLAINT AND AMENDED ANSWER  
AND/OR COUNTERCLAIM**

**THIS MATTER** having been brought before the Court by the Law Office of Timothy F. McGoughran, LLC (Richard Sanvenero Jr., Esq. appearing), attorneys for Petitioner, Chiung-Yin Cheng Liu and Hoagland, Longo, Moran, Dunst & Doukas, LLP (Rajvir S. Goomer, Esq. appearing) attorneys for Respondent, Prakash Santhana; King Moench Hirniak & Mehta, LLP (Matthew C. Moench, Esq. appearing) attorneys for



Respondent, Wendy Patrovich; Cleary Giacobbe Alfieri Jacobs, LLC (Bruce W. Padula, Esq.) attorneys for Respondent, Hon. Christine G. Hanlon; and Deputy Attorney General for the State of New Jersey (Dominic L. Giova, Esq. appearing) for Respondents, Monmouth County Board of Elections and Hon. Mary Desarno, having consented thereto and the Court having considered the matter and for good cause shown;

**IT IS** on this 20th day of February, 2020;

1. Petitioner is hereby permitted to file an Amended Complaint on or before Tuesday, February 18, 2020;
2. Respondents are hereby permitted to file an Amended Answer and/or Counterclaim if necessary on or before Friday, February 28, 2020;
3. A copy of this Consent Order shall be served upon all parties within seven (7) days of entry of same.

s/ Kathleen A. Sheedy

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HON. KATHLEEN A. SHEEDY, J.S.C.

I hereby consent to the form and the entry of the within Order:

**Law Office of Timothy F.  
McGoughran, LLC**  
Attorneys for Petitioner  
Chiung-Yin Cheng Liu

By: 

Richard Sanvenero Jr., Esq.

Dated: 2-10-2020

**Cleary Giacobbe Alfieri Jacobs, LLC**  
Attorneys for Respondent  
Hon. Christine G. Hanlon

By: 

Bruce W. Padula, Esq.

Dated: 2/11/2020

**King Moench Hirniak & Mehta, LLP**  
Attorneys for Respondent  
Wendy Patrovich

By: \_\_\_\_\_

Matthew C. Moench, Esq.

Dated: \_\_\_\_\_

**Hoagland, Longo, Moran, Dunst  
& Doukas, LLP**  
Attorneys for Respondent  
Prakash Santhana

By: \_\_\_\_\_

Rajvir S. Goomer, Esq.

Dated: \_\_\_\_\_

**Deputy Attorney General for  
the State of New Jersey**  
Attorneys for Respondents  
Monmouth County Board of Elections  
and Hon. Mary Desarno

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Dominic L. Giova, Esq.

I hereby consent to the form and the entry of the within Order:

**Law Office of Timothy F.  
McGoughran, LLC**  
Attorneys for Petitioner  
Chiung-Yin Cheng Liu

By: 

Richard Sanvenero Jr., Esq.

Dated: 2-10-2020

**Cleary Giacobbe Alfieri Jacobs, LLC**  
Attorneys for Respondent  
Hon. Christine G. Hanlon

By: \_\_\_\_\_

Bruce W. Padula, Esq.

Dated: \_\_\_\_\_

**King Moench Hirniak & Mehta, LLP**  
Attorneys for Respondent  
Wendy Patrovich

By: 

Matthew C. Moench, Esq.

Dated: 2-10-2020

**Hoagland, Longo, Moran, Dunst  
& Doukas, LLP**  
Attorneys for Respondent  
Prakash Santhana

By: \_\_\_\_\_

Rajvir S. Goomer, Esq.

Dated: \_\_\_\_\_

**Deputy Attorney General for  
the State of New Jersey**  
Attorneys for Respondents  
Monmouth County Board of Elections  
and Hon. Mary Desarno

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Dominic L. Giova, Esq.

I hereby consent to the form and the entry of the within Order:

**Law Office of Timothy F.  
McGoughran, LLC**  
Attorneys for Petitioner  
Chlung-Yin Cheng Liu

By: 

Richard Sanvenero Jr., Esq.

Dated: 2-10-2020

**Clarey Giacobbe Alfieri Jacobs, LLC**  
Attorneys for Respondent  
Hon. Christine G. Hanlon

By: \_\_\_\_\_

Bruce W. Padula, Esq.

Dated: \_\_\_\_\_

**King Moench Hirniak & Mehta, LLP**  
Attorneys for Respondent  
Wendy Patrovich

By: \_\_\_\_\_

Matthew C. Moench, Esq.

Dated: \_\_\_\_\_

**Hoagland, Longo, Moran, Dunst  
& Doukas, LLP**  
Attorneys for Respondent  
Prakash Santhana

By: 

Rajvir S. Goomer, Esq.

Dated: 2-14-2020

**Deputy Attorney General for  
the State of New Jersey**  
Attorneys for Respondents  
Monmouth County Board of Elections  
and Hon. Mary Desarno

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Dominic L. Giova, Esq.

I hereby consent to the form and the entry of the within Order:

**Law Office of Timothy F.  
McGoughran, LLC**  
Attorneys for Petitioner  
Chiung-Yin Cheng Liu

By: 

Richard Sanvenero Jr., Esq.

Dated: 2-10-2020

**Cleary Giacobbe Alfieri Jacobs, LLC**  
Attorneys for Respondent  
Hon. Christine G. Hanlon

By: \_\_\_\_\_

Bruce W. Padula, Esq.

Dated: \_\_\_\_\_

**King Moench Hirniak & Mehta, LLP**  
Attorneys for Respondent  
Wendy Patrovich

By: \_\_\_\_\_

Matthew C. Moench, Esq.

Dated: \_\_\_\_\_

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& Doukas, LLP**  
Attorneys for Respondent  
Prakash Santhana

By: \_\_\_\_\_

Rajvir S. Goomer, Esq.

Dated: \_\_\_\_\_

**Deputy Attorney General for  
the State of New Jersey**  
Attorneys for Respondents  
Monmouth County Board of Elections  
and Hon. Mary Desarno

Dated: 2-10-20

By: 

Dominic L. Giova, Esq.