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20 February 2026

Via CM/ECF

The Honorable Jamel K. Semper, U.S.D.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Wildey v. Salamone, et al.* | Case No. 2:26-cv-01672 (JKS) (CF)

Dear Judge Semper,

This office represents Plaintiff, Michael Wildey, Jr. in the above-entitled matter against the Police Department of the Township of Chester, New Jersey for their violations of Plaintiff's Constitutional right to observe and record public police activity. In that regard, we have filed a Motion for a Temporary Restraining Order and/or Preliminary Injunction and/or Permanent Injunction to prevent future Constitutional violations.

In accordance with your Judicial Preferences, this letter is requesting leave to file an early Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

Federal Rule of Civil Procedure 1 states that the Federal Rules of Civil Procedure must be construed, administered, and employed by courts and parties to secure the just, speedy, and inexpensive determination of every action and proceeding. This guiding principle emphasizes fairness, efficiency, and cost effectiveness. A motion for summary judgment at this time directly advances these goals by enabling the prompt disposition of this matter, as there are no genuine issues of material fact, even though the case has just been filed.

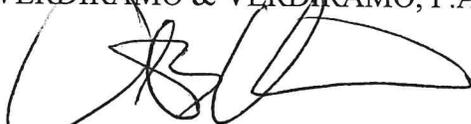
The substantive arguments in support of Plaintiff's proposed Summary Judgment Motion will be identical to Plaintiff's Motion for a Temporary Restraining Order. As a matter of the evidence, the case requires no more discovery than we have now. All relevant and material facts were recorded on two police bodycam videos. The provenance of those videos is not in question, they were received from the Defendants, themselves.

Therefore, there are no genuine issues of material fact. Hence, it is a logical and efficient use of the Court's time to determine the issue of liability immediately without wasteful motion practice or discovery.

Of course, Plaintiffs recognize that from the Defendants' perspective, perhaps there are material facts they need to explore. Should that be the case, the Plaintiff urges the Court to reject a rote "we need discovery" and to hold the Defendants to the requirements of Fed. R. Civ. P. 56(d). That is, they should bear the burden of saying what additional discovery they need, why they need it, and how it will materially affect the outcome of a motion for summary judgment.

Very truly yours,

VERDIRAMO & VERDIRAMO, P.A.

A handwritten signature in black ink, appearing to read 'V. S. Verdiramo', written over the printed name below.

VINCENT S. VERDIRAMO

cc: The Hon. Cari Fais, U.S.M.J.
Alan R. Levy, Esq.
Marc J. Randazza, Esq.