

CONNELL FOLEY LLP  
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Attorneys for Seton Hall University

ANTHONY ROMEO, individually  
and on behalf of himself and  
student applicants for  
"TRUTH", a gay and lesbian  
student organization denied  
Provisional Recognition by  
Seton Hall University,

Plaintiff,

vs.

SETON HALL UNIVERSITY, Inc.,  
A.B.C. Corp.'s 1-100, John  
Does 1-100 and DEF Non-Profit  
Corp.'s or Institutions 1-100  
that may be necessary but  
currently unknown to Plaintiff  
for purposes of effectuating  
the equitable relief sought  
herein,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY  
DOCKET NO. ESX-L-1866-04

Civil Action

**NOTICE OF MOTION TO DISMISS  
PURSUANT TO RULE 4:6-2(e)**

**TO:** Thomas D. Shanahan, Esq.  
Shanahan & Associates, P.C.  
545 Fifth Avenue, Suite 1205  
New York, New York 10017

Please take notice that on Friday, June 25, 2004, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for defendant Seton Hall University ("Seton Hall"), shall move before the Superior Court, Essex County, for the entry of an Order to dismiss plaintiffs' Complaint in this matter with prejudice for failure to state a claim upon which relief can be granted.

Seton Hall shall rely upon its brief in support of this

motion and the Certification of Dania M. Billings filed herewith.

**Weekly call:** N/A **Trial Date:** N/A **Pretrial:** N/A **Arbitration:** N/A

Pursuant to Rule 1:6-2(c) the undersigned:

Waives oral argument

XXX Requests oral argument

Attached hereto is a copy of the proposed Order.

CONNELL, FOLEY LLP  
Attorneys for Defendant,  
Seton Hall University

By: *Dania Billings*  
Dania M. Billings

DATED: June 9, 2004