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January 2, 2026

*Via Electronic Filing*Hon. Nicholas Ostuni, Sr., P.J.
Bergen County Courthouse
10 Main Street, 4th Floor
Hackensack, NJ 07601**Re: Saro Hartounian, et al. v. Van Z. Krikorian,
Docket No. BER-C-00287-25**

Dear Judge Ostuni:

This firm represents Plaintiffs Hyegate, LLC, Saro Hartounian, and Nareg Hartounian in the above-captioned action. In accordance with the Court's December 23, 2025 Order, Plaintiffs filed their opposition to Defendant's application at 4 pm today. Defendant, on the other hand, did not file any opposition to Plaintiffs' application for a Temporary Restraining Order despite the 5 pm deadline. Therefore, we respectfully request that Plaintiffs' application be deemed unopposed. Your Honor's December 23, 2025 Order was clear, and for clarity of the record Plaintiffs object to any belated submissions by Defendant at this point. We would note that Defendant has had Plaintiffs' application since **December 9, 2025**. On the other hand, we only received Defendant's application on December 23, 2025, but still met the Court's deadline.

Thank you for consideration.

Respectfully Submitted,

/s/ James Van SplinterJAMES VAN SPLINTER
Member

cc: counsel of record (via e-filing)