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January 3, 2026

[Via eCourts and comments.mailbox@njcourts.gov](mailto:Via_eCourts_and_comments.mailbox@njcourts.gov)

Honorable Michael J. Blee, J.A.D.
Acting Administrative Director of the Courts
Attention: MCL Application – Daniel’s Law Litigation
Richard J. Hughes Justice Complex, P.O. Box 307
25 Market Street
Trenton, New Jersey 08625-0037

Re: Notice to the Bar (December 3, 2025)
MCL Application - Daniel's Law Litigation

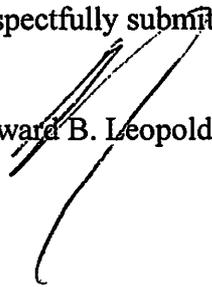
Dear Judge Blee:

This office represents Defendant, Sagewire Research, LLC, (“Sagewire”) with regard to the matter of Atlas Data Privacy Corporation, et al v. Sagewire Research, LLC, et al Docket No: BER-L-869-24. Sagewire objects to the application filed by Atlas to establish a multicounty litigation for the 111 NJ State Daniels’ Law cases currently pending. The reasons set forth in the January 2, 2026 Troutman submission are incorporated herein

Further, these cases are all far different from one another and are at different stages of discovery. Combining these cases will severally prejudice Sagewire who will be forced to become embroiled in these other disputes having nothing to do with Sagewire. There is also no reason why information should be shared among all these parties when much of the information is confidential. Moreover, there is no proof that the granting of the Atlas application will in any manner save time or judicial resources. As the defants in these cases are far different from one another, MCL treatment will likely complicate these cases.

Accordingly, this application must be denied.

Respectfully submitted,


Howard B. Leopold

HBL/vmd

cc: All Atlas counsel *via eCourts*