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**JENNIFER N. SELLITTI**  
*Public Defender*

October 8, 2024

Honorable Chief Justice  
and Associate Justices  
Supreme Court of New Jersey  
P.O. Box 970  
Trenton, NJ 08625

Re: State v. Jule Hannah  
App. Div. Docket No. 3528-21

Your Honors:

Please accept this letter in lieu of a more formal response on behalf of defendant-respondent Jule Hannah to the State's petition for certification in the above case. Defendant relies on his Appellate Division brief and notes that the Appellate Division's unpublished opinion is a straightforward application of the fundamental rule that expert testimony is needed on a subject that is beyond the understanding of the average person of ordinary experience, education, and knowledge.

Because the State presents no substantial issue for certification, the petition should be denied.

Respectfully submitted,

**JENNIFER N. SELLITTI**  
Public Defender  
Attorney for Defendant-Petitioner

BY: /s/ Stefan Van Jura  
**STEFAN VAN JURA**  
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cc: Bethany L. Deal, D.A.G.