



1. I am an attorney at law of the State of New Jersey and Executive Director of New Jersey Appleseed Public Interest Law Center ("NJ Appleseed").

2. Applicant NJ Appleseed is a nonprofit corporation established to provide legal advocacy on behalf of New Jersey residents in matters raising significant public policy issues. I make this certification in support of NJ Appleseed's motion to file an untimely motion for leave to appear as amicus curiae.

3. Pursuant to its government accountability and election reform focus, NJ Appleseed has worked with, and has represented, several community organizations who have decided to hold their local government accountable by circulating an initiative or referendum petition. Ordinances have varied from initiatives to support anti pay-to-play reforms, maintain rent control, change the form of government, establish a municipal legal department, re-name a street, and most recently, return municipal water treatment and supply functions to Newark back from a nonprofit corporation that the citizens determined had gone rogue.

4. Sometime in early April of this year, I received a phone call from a colleague of mine informing me of the Supreme Court's decision, dated March 22, 2014, to accept certification in this matter. He was aware that the ground on which the trial court had relied to deny the citizen's initiative petition in Redd was similarly applied by an Essex County trial court,

sometime last October, against NJ Appleseed's client, the Newark Water Group.

5. Once I read the trial and appellate courts' decisions, distributed them to a select group of the Newark Water Group, and secured permission of my Board to file an amicus, over one month had passed. A member of my Board was assigned to oversee the drafting of the amicus, and once a draft was completed, I still needed that member's affirmative approval. Accordingly, the motion was not filed until last Friday, June 19, 2014, approximately two weeks after the 75-day deadline.

6. It is my understanding that this Court has not scheduled oral argument in this matter, and accordingly each of the parties has time to respond to our motion.

7. For the foregoing reasons, I believe that good cause has been shown, and NJ Appleseed's motion, which was filed on June 19, 2014, should be considered timely.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, that I am subject to punishment.

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RENÉE STEINHAGEN

Dated: June 23, 2013