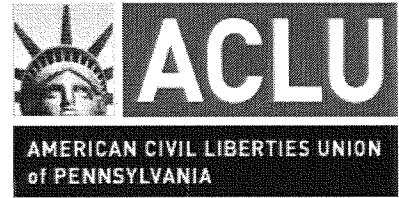




COZEN

O'CONNOR®

GEORGE  
R. BARRON  
ATTORNEY



David Vaida  
Attorney

### **The Community Justice Project**

By Hand and Facsimile

August 15, 2006

Mr. Louis Barletta  
Mayor, City of Hazleton  
40 North Church Street  
Hazleton, PA. 18201

Dear Mayor Barletta:

Today, a number of Hazleton residents, local businesses and community organizations filed a lawsuit against the City of Hazleton seeking to void the ordinance it recently passed entitled the "Illegal Immigration Relief Act Ordinance" ("Ordinance"). As our earlier letter of July 11, 2006, stated, we believe that the Ordinance will be found to violate the United States Constitution, various civil rights laws, and state law. As made clear by the Congressional Research Service's legal analysis report concerning the Ordinance already in your possession, it is quite likely that the courts will grant the relief plaintiffs seek.

The plaintiffs and their attorneys would prefer to resolve this matter amicably. We request that, at its August 15, 2006, meeting the City Council revoke its enactment of the Ordinance and agree to enter into a consent decree providing that it will not subsequently enact any ordinance that attempts to regulate immigration or is otherwise dependent upon a person's immigration status in its intentions, implementation or impact.

If the City agrees to resolve this matter in this fashion, the plaintiffs and their attorneys will agree not to apply for attorneys fees and expenses as well as all other relief to which the plaintiffs will be entitled.

We hope you consider this offer seriously and would be willing to meet at any time to discuss it. If you do not accept it, we will move shortly after your August 15<sup>th</sup> Council meeting for preliminary relief seeking to enjoin its implementation.

Page Two

August 15, 2006 Letter to City of Hazleton and Mayor Louis Barletta

This Ordinance, if allowed to stand, will take Hazleton, and the towns that enact laws mimicking it, back to the worst days of America where certain kinds of people could not by law own land, run businesses or live in certain places. Many of those who are the target of the Ordinance have lived, gone to school and worked for many years in Hazleton. In desperation and fear, some of those residents have already decided to close their businesses, move out of Hazleton, or simply hide as best they can behind closed doors. On all of their behalf, we ask that you reconsider the enactment of this Ordinance.

Yours truly,



Foster Maer, Esq.  
Lee Llambelis, Esq.  
Jackson Chin, Esq.  
Puerto Rican Legal Defense & Education Fund  
99 Hudson St., 14 Floor  
New York, NY 10013

Thomas G. Wilkinson, Esquire  
Doreen Yatko Trujillo, Esquire  
Linda S. Kaiser, Esquire  
William J. Taylor, Esquire  
Elena Park, Esquire  
Douglas W. Frankenthaler, Esquire  
Ilan Rosenberg, Esquire  
COZEN O'CONNOR  
1900 Market Street  
Philadelphia, PA 19103

Laurence E. Norton, II, Esq.  
Peter Zurflieh, Esq.  
Shamaine Daniels, Esq.  
Community Justice Project  
118 Locust Street  
Harrisburg, PA 17101

Omar C. Jadwat, Esq.  
American Civil Liberties Union Foundation  
Immigrants' Rights Project  
125 Broad St., 18th Fl.  
New York, NY 10004

Jennifer C. Chang, Esq.  
American Civil Liberties Union Foundation  
Immigrants' Rights Project  
39 Drumm Street  
San Francisco, CA 94111

Witold J. Walczak, Esq.  
Paula Knudsen, Esq.  
Mary Catherine Roper, Esq.  
American Civil Liberties Union of  
Pennsylvania

George R. Barron, Esq.  
88 North Franklin Street  
Wilkes-Barre, Pennsylvania 18701

Barry H. Dyller, Esq.  
88 North Franklin Street  
Wilkes-Barre, PA 18702

David Vaida, Esq.  
137 North 5<sup>th</sup> Street  
Allentown, PA 18201

Cc: All City Council Members  
City Solicitor