



October 12, 2026

VIA ECF

The Honorable Michael E. Farbiarz
United States District Judge
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building &
U.S. Courthouse
50 Walnut St., Room 4015
Newark, NJ 07101

Re: Palazzi v. Nat'l Ct. Reps. Ass'n
Case No.: 2:25-cv-00077-MEF-JSA (D.N.J.): *Product Markets Alleged*

Dear Judge Farbiarz,

Pursuant to the Court's October 8, 2026 Order, Plaintiffs respectfully submit this letter in response to the Court's request for clarification regarding the product markets set forth in the Amended Complaint. ECF 28. Plaintiffs recognize that the Court's Order interprets the Amended Complaint as alleging "two alternative product market definitions." ECF 37. Plaintiffs respectfully clarify that they allege two separate and independent product markets, neither of which is intended as an alternative to the other.

Plaintiffs allege that both antitrust product markets are integral to their claims. **First**, the Stenographic Certification Market encompasses state licensing and certification boards, as well as national organizations such as NCRA, NVRA, and AAERT (*see* ECF 28, ¶¶40, 121). These entities administer and sell Stenographic Certification to stenographers, who must obtain and maintain certification to work in states or for employers that require such credentials. *Id.*, ¶¶72-76. **Second**, the Stenographic Membership Market consists of a different product, the sale of professional association memberships to stenographers seeking access to membership services and opportunities to engage with a broader stenographic community at national, regional, and local levels. *Id.*, ¶¶53-55, 124-125.

Plaintiffs submit that NCRA unlawfully leverages its dominance in the Stenographic Certification Market by conditioning the maintenance of NCRA certification on the purchase of a separate product, NCRA membership—a requirement wholly unrelated to the professional qualifications for stenographic certification. By tying certification maintenance to membership, NCRA establishes and maintains an anticompetitive monopoly in the Stenographic Membership Market. As alleged in the Amended Complaint, certification and membership serve distinct purposes and respond to separate consumer demands: certification and its maintenance are essential for

Judge Michael E. Farbiarz
October 12, 2026
Page 2

employment, while membership offers ancillary benefits that, though marketed as enhancing professional engagement, bear no relation to professional competency.

Plaintiffs hope this letter provides the requested clarification. Plaintiffs are standing by should the Court need any additional information.

Respectfully submitted,

s/ Christopher A. Seeger

Christopher A. Seeger

Plaintiffs' Counsel

cc: All Counsel of Record