

# KIPP & ALLEN, LLP

ATTORNEYS AT LAW

RICHARD J. ALLEN, JR.\*  
WALTER A. KIPP, III\*\*  
KAREN A. BEERBOWER\*

MEMBER NJ & NY BAR \*  
MEMBER NJ & CT BAR \*\*

52 CHESTNUT STREET  
P.O. Box 133  
RUTHERFORD, NEW JERSEY 07070

PHONE: 201-933-3633  
FAX: 201-933-4611

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## VIA E-MAIL ONLY

Elizabeth K. McManus, PP, AICP, LEED  
Clarke Caton Hintz  
100 Barrack Street  
Trenton, New Jersey 08608

**Re: In the Matter of the Application of the Borough of East Rutherford  
For a Judgment of Compliance and Repose  
Docket No.: BER-L-5925-15**

Dear Ms. McManus:

Pursuant to the Court's September 24, 2015 Order you have been appointed as Special Master in the above referenced litigation.

In accordance with Paragraph 1 of the Court's October 29, 2015 Case Management Order, enclosed you will find the "Summary of Plan" submitted on behalf of the Borough of East Rutherford. In accordance with the Court's Order, copies are being provided to all interveners and interested parties. In addition, a copy will be posted on the Borough's Website.

Note that the enclosed is subject to ratification by Robert T. Regan, Esq., the Monitor appointed by the court in the Tomu decision.

We look forward to reviewing this matter with you at your convenience.

Respectfully Submitted,

  
Richard J. Allen, Jr.

RJA:kg

Enclosure

cc: Robert T. Regan, Esq. – via regular mail  
George Steveson, PP – via e-mail only  
Danielle Lorenc, Borough Clerk – via e-mail only  
All Interested Parties – via regular mail