



21 Roszel Road  
P.O. Box 5226  
Princeton, NJ 08543-5226  
609.924.0808 main | 609.452.1888 fax  
www.hillwallack.com

Direct Dial: (609) 734-6336  
tcarroll@hillwallack.com

January 13, 2020

VIA ECOURTS AND REGULAR MAIL  
The Hon. Robert J. Mega, J.S.C.  
Union County Courthouse  
2 Broad Street  
Elizabeth, New Jersey 07207

**Re: In the Matter of the Application of the Township of Cranford,  
County of Union; Docket No.: UNN-L-3976-18**

Dear Judge Mega:

This firm represents Defendant-Intervenors, Hartz Mountain Industries, Inc., H-Conduit LP, and H-Cranford Credit LP (collectively "Hartz") in the above-captioned matter. Pursuant to the Court's November 15, 2019 Order, and in support of Hartz's objections to the proposed settlement, enclosed please find the expert report of Art Bernard, P.P., with exhibits attached thereto, and Hartz's Brief addressing certain legal issues raised by the proposed settlement.

A Fairness Hearing in connection with the Settlement Agreement is currently scheduled for February 19, 2020 at 10:00 a.m.

Thank you for your attention to this matter.

Respectfully submitted,

HILL WALLACK LLP



Thomas F. Carroll, III

Enclosures

Cc: Jeffrey R. Surenian, Esq. (*via Ecourts & email*)  
Ryan Cooper, Esq. (*via Ecourts & email*)  
Kevin D. Walsh, Esq. (*via Ecourts & email*)  
Gary S. Forshner, Esq. (*via Ecourts & email*)  
Special Master Kendra Lelie, PP/AICP (*via Ecourts & email*)