

## SURENIAN, EDWARDS & NOLAN LLC

Jeffrey R. Surenian, Esq.  
Email - JRS@Surenian.com

Michael J. Edwards, Esq.  
Email - MJE@Surenian.com

Erik C. Nolan, Esq.  
Email - EN@Surenian.com

A Limited Liability Company  
Counselors at Law  
Brielle Galleria  
707 Union Avenue, Suite 301  
Brielle, New Jersey 08730  
Phone (732) 612-3100  
Fax: (732) 612-3101

Christine M. Faustini, Esq.  
Email - CMF@Surenian.com

Nancy L. Holm, Esq.  
Email - NLH@Surenian.com

Ann Marie Harrison, Esq.  
Email - AMH@Surenian.com

October 7, 2020

### **VIA ECOURTS**

**Honorable Thomas J. Walsh, J.S.C.**

Union County Courthouse  
2 Broad Street  
Elizabeth, NJ 07207

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

Dear Judge Walsh:

As Your Honor is aware, this Firm represents the Township of Cranford in the above-referenced matter. The Township and Hartz Mountain have engaged in meaningful settlement discussions and mediation with the assistance of the Court's Special Master, Kendra Lelie. In an effort to settle this case, the Parties, inclusive of FSHC, request that the Court adjourn the Final Compliance Hearing, currently scheduled for November 16, 2020 - until at least mid-January to provide the Parties sufficient time to negotiate a potential settlement. The Court's Master supports this request. I have attached a proposed form of Order adjourning the Compliance Hearing until a date convenient for the Court.

I thank Your Honor for your time and attention in this matter.

Respectfully Submitted,

*Michael J. Edwards*

Michael J. Edwards

MJE/ln

Enclosure

cc: Bassam Gergi, Esq. (*via email and eCourts*)  
Thomas Carroll, III, Esq. (*via email and eCourts*)  
Henry Kent-Smith, Esq. (*via email and eCourts*)  
Special Master Kendra Lelie (*via email*)  
Ryan Cooper, Esq. (*via email and eCourts*)

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707 Union Avenue, Suite 301

Brielle, NJ 08730

(732) 612-3100

Attorneys for Declaratory Plaintiff, Township of Cranford, et. al.

By: Michael J. Edwards (Attorney ID: 032112012)

**IN THE MATTER OF THE  
APPLICATION OF THE TOWNSHIP OF  
CRANFORD, COUNTY OF UNION**

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY**

**Docket No.: UNN-L-3976-18**

*Civil Action- Mount Laurel*

**ORDER ADJOURNING COMPLIANCE  
HEARING PENDING SETTLEMENT  
DISCUSSIONS WITH HARTZ  
MOUNTAIN**

**THIS MATTER** having been opened to the Court by Michael J. Edwards, Esq. appearing on behalf of declaratory plaintiff, Township of Cranford (hereinafter “the Township”); and the Township and Hartz Mountain having engaged in meaningful, ongoing settlement negotiations; and the parties having determined that an additional few months is needed to fully and properly negotiate a potential settlement; and a Joint Fairness and Compliance Hearing currently scheduled for November 16, 2020; and for other good cause;

IT IS on this \_\_\_\_ day of October 2020, hereby **ORDERED**:

1. The Joint Fairness and Compliance Hearing currently scheduled for November 16, 2020 is hereby adjourned to January \_\_\_\_, 2021 at \_\_\_\_ p.m.
2. A copy of this Order shall be served on all counsel and the Court’s Special Master within seven (7) days of the date hereof.

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Honorable Thomas J. Walsh, J.S.C.