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April 28, 2020

**Via E-Courts and Federal Express**

Hon. Thomas J. Walsh, J.S.C.  
Superior Court of New Jersey, Law Division  
Union County Courthouse  
2 Broad Street  
Elizabeth, New Jersey 07207

**Re: Hartz Mountain Indus., Inc. v. Township of Cranford, et al.**  
**Docket No. UNN-L-3679-19**

Dear Judge Walsh:

This firm represents Defendants Hartz Mountain Industries, Inc., H-Cranford Conduit L.P., and H-Cranford Credit L.P. (“Hartz”) in connection with above referenced matter. Please find enclosed Hartz’s trial brief in support of Counts 1 and 2 of the Complaint, together with the Certification of Kimberly Bennett, Esq. As the Court is aware, Hartz’s trial brief was due on April 27, 2020 in accordance with Case Management Order No. 2. Please accept my apologies for its late filing, which was as a result of technical difficulties that had ensued over the past several days. As co-counsel have been gracious enough to extend the time for Hartz’s trial brief, we likewise have agreed to extend the filing date of the defendants’ responsive briefs until June 2, 2020.

The Court’s courtesies in this matter are greatly appreciated.

Respectfully,

A handwritten signature in black ink that reads 'Irina B. Elgart'.

Irina B. Elgart

Encl.

cc: Counsel of Record (via E-Filing, E-mail, and Federal Express)

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