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October 5, 2021

Via E-Courts and Federal Express

Hon. Christina A. Farrington, J.S.C. Bergen County Courthouse 10 Main Street, Room 415 Hackensack, New Jersey 07601

Re: The Stop and Shop Supermarket Company LLC v. Twp. of Teaneck, et al. Docket No. BER-L-003507-21

Dear Judge Farrington:

This firm represents Defendant Township of Teaneck in the above-captioned matter.

On behalf of the parties, we respectfully request that the Court schedule a case management conference in the matter.

Briefly, this action involves the designation of certain parcels of land within the municipality a comprising a non-condemnation area-in-need of redevelopment ("AINR"). Plaintiff, inter alia, has objected to the inclusion of its parcels within the AINR. Pursuant to the Consent Order entered September 22, 2021, defendants' time to answer or otherwise move is currently November 12, 2021.

Since the commencement of the action, the parties, as well as interested third-parties, have engaged in repeated, substantive and productive negotiations in an effort to amicably resolve Plaintiff's claims, and to bring to fruition the redevelopment project underlying the current dispute. The parties recognize that it will take time to implement the steps necessary to effect the contemplated settlement of the matter. Such steps may include but are not limited to (a) the preparation of certain impact studies, (b) continued project designing, and (c) the implementation of the appropriate local legislation for the adoption of an applicable redevelopment plan.

Given the foregoing, we seek Your Honor's guidance in order to set an appropriate schedule for the disposition of this case.

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We thank Your Honor for your consideration.

Respectfully submitted,

<u>/s/ Reginald Jenkins, Jr.</u> Reginald Jenkins, Jr.

RJJ/hf

cc: All Counsel of Record, via E-Courts Brian Eyerman, Esq.