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August 19, 2019

VIA ELECTRONIC AND REGULAR MAIL

Hon. Mario M. Kranjac
Borough of Englewood Cliffs
482 Hudson Terrace
Englewood Cliffs, NJ 07632

Re: Declaratory Judgment Action

Dear Mayor Kranjac:

We have been instructed by the Borough's legal department that until such time as the Governing Body has an opportunity to discuss your demands at the September meeting of the Governing Body, the Borough does not authorize our firm to produce to you all of our communications "with anyone" since November 2018 (or otherwise) and no longer authorizes us to produce or disclose to you documents or information that would be subject to privilege as an attorney-client communication or as attorney-work product.

While we expect that you will disagree with this, we hope that you can understand the position that we are in.

We likewise understand that you will be appearing before the Court soon on a similar issue regarding your access to documents. Once the Court renders a decision, perhaps it will result in a change of position by either side as to the foregoing.

Finally, as for your other communications demanding that my office advise as to the "complete deposition schedule," as we have previously advised, the parties to the litigation have not yet agreed upon a deposition schedule.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas J. Trautner Jr.", is written over the typed name. The signature is fluid and cursive, with a long horizontal flourish extending to the right.

THOMAS J. TRAUTNER JR.

TJT:kac

cc: Joseph Mariniello Jr., Esq. (via electronic and regular mail)
Albert Wunsch, III, Esq. (via electronic and regular mail)