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October 3, 2022

Hon. Stephen Hansbury, J.S.C. Courtroom 151 Morris County Courthouse Court Street and Anne Street Morristown, NJ 07960

Re: I/M/O Borough of Chatham Application for Judgment of Compliance with Third Round Mount Laurel Affordable Housing Obligation,
Docket No. MRS-L-1906-15
SUBMISSION OF FULL SIZE BCUW PROPOSAL ANDD PRO FORMA SUPPORTING
THE BCUW 15-UNIT 100% FAMILY RENTAL AFFORDABLE HOUSING PROJECT

## Dear Judge Hansbury:

As you are aware, I represent plaintiff / petitioner Borough of Chatham (the "Borough") in the above matter which has a compliance hearing scheduled for November 7, 2022. As you are also aware, your Honor entered an order on August 25, 2022 (the "August 25, 2022 Order") which granted the Borough's motion to enforce litigant's rights against Fair Share Housing Center ("FSHC"), ordering FSHC to review in good faith the Bergen County United Way ("BCUW") 15-unit 100% family rental affordable housing project (the "BCUW project") proposed in the Post Office Plaza redevelopment area to comply with the court-approved First Amendment to the Settlement Agreement dated June 1, 2021 (the "First Amendment").

I previously submitted to the court by letters dated September 22, 2022 a number of documents supporting the BCUW project, including the Redevelopers Agreement entered into by and between the Borough and BCUW (document #6), which included as an exhibit BCUW's June 16, 2022 proposal and pro forma which I had submitted to Rachel Lokken, Esq. at FSHC on June 16, 2022. I am submitting with this letter the June 16, 2022 proposal and pro forma as document #12 as it is easier to read than the smaller copy attached to the Redevelopers Agreement as an exhibit.

Respectfully submitted,

STICKEL, KOENIG, SULLIVAN & DRILL, LLC

Bv:

JONATHAN E. DRILL

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## Copy via eCourts and email:

Joseph H. Burgis, AICP, PP (court special master)

Rachel N. Lokken, Esq. (attorney for defendant intervenor FSHC)

Craig M. Gianetti, Esq. (attorney for objector SV joint venture)