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MARILYN RHYNE HERR

January 7, 1985

Bruce S. Gelber, Esq. National Committee against Discrimination in Housing 733 15th Street, N.W. Washington, DC 20005

Dear Mr. Gelber:

Your letter, which is dated December 20, 1984, was delivered by the Post Office to our office on January 4, 1985. As your letter indicates, responses were to have been served by January 7, 1985. Since this letter is being dictated in response on January 7, it will have to be considered as my very best effort to meet that schedule. I have no explanation for the delay in delivery of your letter of December 20, 1984. Unfortunately, I did not preserve the envelope to examine the postmark. In any event, we have already sent to you a copy of the letter which we sent to Phillip Paley, indicating that we will rely upon the testimony of Harvey Moskowitz, if necessary, with respect to Parcels 43 and 45. Obviously, we agree with the recommendations of Carla Lerman with respect to the rezoning of these parcels. Our separate complaint, which has been consolidated with your complaint, asks the court for specific rezoning and for a builder's remedy. I will bring with me concept maps showing how the proposed development of this property for high-density residential development will relate to the present proposals for the development of the Hovnanian tract immediately to the south.

Since we are not in an adversary position, I have not bothered to answer your rather formal interrogatories.

Very truly yours,

Raymond R. Trombadore

RRT:smr

Honorable Eugene D. Serpentelli / Phillip Paley, Esq. Donald R. Daines, Esq. Barbara J. Williams, Esq.