

AMG

Shanee v. Warren

9-7-84

letter re: objection to discovery requests.

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September 7, 1984

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The Honorable Eugene D. Serpentelli
 Judge, Superior Court of New Jersey
 Ocean County Court House
 CN 2191
 Toms River, NJ 08753

RECEIVED
 SEP 10 1984

Re: Shainee Corp. vs. Township of Warren
 Docket No. L-034351-84

JUDGE SERPENTELLI'S CHAMBERS

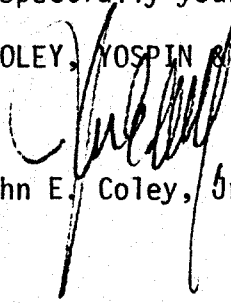
Dear Judge Serpentelli:

I am in receipt of the revised Order attached to Mr. Hall's letter dated August 30, 1984. I hereby lodge my objection to that Order as the requests for discovery therein are burdensome to the Township and would prove extremely expensive to comply with. As a matter of fact, most of the matters requested by Mr. Hall are in the Court's possession and neither Al Mastro, Gene Jacobs nor I have the same. I feel that it would be encumbent upon Mr. Hall to seek his discovery in the traditional manner and do not see why he should have a blanket fishing expedition as he requests. Any of the materials developed in the AMG litigation have no relevance whatsoever to the Shainee litigation.

I will be prepared to argue this matter when the summary judgment motion is argued before your Honor on September 21, 1984. Very possibly, after the argument on the motion, all discovery processes will be moot.

Respectfully yours,

KUNZMAN, COLEY, YOSPIN & BERNSTEIN



John E. Coley, Jr.

JEC/g1

cc: Thomas J. Hall, Esq.
 Eugene W. Jacobs, Esq.
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