

PETER DICKSON
ATTORNEY AT LAW
LAW OFFICES OF PETER DICKSON
23 ROUTE 31 NORTH, SUITE A28
PENNINGTON NEW JERSEY 08534

MEMBER N.J. AND D.C. BARS

Telephone: (609) 690-0312
Cell phone: (609) 651-9960

March 12, 2025

The Honorable Veronica Allende
Judge
Superior Court
Somerset County Courthouse
20 North Bridge Street, Floor 1
Somerville NJ 08876-1262

Re: Morrisette v. Town of Phillipsburg Town Council, WRN-L-000378-24
Letter Report on Communication Among Parties' Counsel

Dear Judge Allende:

This firm represents the plaintiffs in this action, David P. Morrisette and Sandra S. Morrisette. I write to advise the court of the status of the parties' discussions concerning the case management conference tomorrow. I advise the court that plaintiffs will shortly file a motion to reconsider Your Honor's order granting intervention to Peron Construction, Inc.

On behalf of all the parties, including intervenor Peron, I advise the court that the parties have been unable to agree. Plaintiffs had proposed the following schedule:

March 26: plaintiffs propound interrogatories and requests for documents

April 16, responses to discovery due, including any proposed protective

order

May 14, Plaintiffs' Trial Brief, which will include a motion to supplement the record

June 11, Defendant's (and Intervenor's as applicable) trial brief

June 25, Plaintiff's reply brief

Oral argument at Court's discretion.

Peron did not generally object to the proposed schedule but objected to the discovery. The Town of Phillipsburg objected to the discovery as well and asked that the briefing schedule be moved up.

The law allows discovery in actions in lieu of prerogative writs at the discretion of the court, although it is admittedly not routine. At the conference tomorrow, plaintiffs will request that the court consider a motion to supplement the the record to permit the limited discovery we seek.

We thank the court for its consideration.

Respectfully,

/s/ Peter Dickson

Peter Dickson

Attorney for Plaintiffs, David P.

Morrisette and Sandra S. Morrisette

N.J. Attorney # 001661979