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October 12, 2022

**VIA E-FILE**

Hon. Stephan C. Hansbury  
Morris County Courthouse  
Washington & Court Streets  
PO Box 910, 3rd Floor  
Morristown, NJ 07963

**Re: *In Re Borough of Chatham***  
**Docket No.: MRS-L-1906-15**

Dear Judge Hansbury:

This office represents interested-party SV Chatham PO JV LLC (“SV”), in connection with the above-referenced matter. We are in receipt of the report of the court-master, Joseph Burgis, dated October 3, 2022 (“Court Master Report”) issued pursuant to Your Honor’s order of August 25, 2022 (“Order”).

Please accept this letter as SV’s response to the Court Master Report pursuant to the Order. SV objects to the Court Master Report. The Court Master Report is effectively just a recitation of the information and documents provided by the Borough to the Court Master. On September 29, 2022, SV submitted a letter to the Court Master commenting on the information provided by the Borough. SV raised a number of issues, planning and otherwise, that were not addressed by the Court Master, despite being the type of matters routinely addressed by court masters in affordable housing cases. In fact, some of the issues were based upon comments and questions Your Honor raised at the August 25<sup>th</sup> oral argument on the various motions. Similar to the Court Master’s August 24<sup>th</sup> report to the Court, the Court Master does not comment or address any of the legitimate issues raised by SV. Rather, the Court Master stated that he can comment on these issues at the Compliance Hearing if the Court desires.

We respectfully request that Your Honor require the Court Master to supplement his report to address SV’s comments. SV raised legitimate issues that the Court Master should address in this report and at the Compliance Hearing. SV, and all parties, have a right to know what the Court Master’s opinions are on these issues in writing prior to the Compliance Hearing.

Thank you for your attention and consideration in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'C. M. Gianetti', written over a horizontal line.

Craig M. Gianetti

CMG/rdm

cc: Jonathan Drill, Esq.  
Rachel Lokken, Esq.  
Joseph Burgis, P.P.