

## Elizabeth Umland

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**From:** Barbara Conklin [Barbara.Conklin@law.dol.lps.state.nj.us]  
**Sent:** Friday, September 29, 2006 6:09 PM  
**To:** Mark Porada  
**Cc:** cseitz@cblh.com; DFREDERICK@KHHTE.com; Rachel Horowitz  
**Subject:** NJ v. DE: Reply to Delaware letter concerning NJ reschedulingrequest

**Importance:** High



DEsept26Ltr.pdf  
(580 KB)

**\*\* High Priority \*\***

Dear Mr. Porada:

New Jersey has reviewed Delaware's letter to the Special Master and offers the following brief comment:

Delaware now admits that within the 6,268 pages of documents received by New Jersey on September 27 that there are 2,091 pages of historical research relating to permitting and activities and 558 photos or maps taken on September 15, 2006 that New Jersey has not yet seen. Delaware's promise not to reply on this material in its deposition of New Jersey witnesses ignores the fact that New Jersey may wish to depose Delaware's witnesses about these materials \* especially since Delaware asserts its intention to use these materials "at trial."

Moreover, Delaware's description of the 6,268 pages in its September 26 letter was grossly inadequate (see attached, below) and its recent letter does little to cure the deficiency, especially as it relates to material which New Jersey has never before seen. Delaware also has offered no explanation why it commingled thousands of pages of previously-produced material with thousands of pages of new material, all, delivered just prior to depositions, without any attempt to identify the new material. See Ex. A, below. Under such circumstances, New Jersey was compelled to adjourn the depositions to ensure it had a reasonable period of time to review this voluminous production prior to taking or defending depositions.

If you require further information, please advise.

limited use of this material as part of its case in chief does not deprive New Jersey of its

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REPLY TO Wilmington Office

September 26, 2006

**BY OVERNIGHT DELIVERY**

Rachel J. Horowitz, Esquire  
Deputy Attorney General  
Richard J. Hughes Justice Complex  
25 West Market Street  
P.O. Box 112  
Trenton, N.J. 08625

**Re: State of New Jersey v. State of Delaware  
No. 134, Original**

Dear Ms. Horowitz:

Enclosed please find the State of Delaware's fifth round of production, comprised of one CD, one DVD and seven maps. The CD contains documents with Bates numbers DE22716 – DE28984. The DVD contains a movie file and is labeled with Bates number DE28985.

Finally, enclosed are identical copies of the large maps produced on August 26, 2006. These maps were originally Bates labeled DE18208 – DE18214. Due to a mistake, subsequent documents in our September 1, 2006 production were marked with the same Bates range. In order to avoid confusion, we have enclosed the same maps but with unique and different Bates numbers. Please rely on these maps, marked DE28986 – DE28992 and disregard the maps produced on August 26, 2006. As stated in our August 26, 2006 letter, these maps can be found on the Internet at <http://datamil.delaware.gov/website/mapprod/default.asp?pixwidth=850&pixheight=600&addNS=0>.

Among the items in today's production is a brief in the *Ampro Fisheries, Inc. v. Yaskin* case. See DE27871 – DE27895. We were unable to find page twenty-three of this brief. If you have that in your possession or are able to locate this missing page, please forward it me.

Rachel Horowitz, Deputy Attorney General

September 26, 2006

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Finally, Delaware has provided a location chart for the four basic categories of documents produced.<sup>1</sup> See Exhibit "A." As we have stated in the past, and reiterate here, the Bates numbers provided in the chart are a non-exclusive listing of potentially relevant documents for each basic category. Delaware reserves the right to use any document for any purpose in these proceedings.

If you have any questions, please feel free to contact me.

Sincerely,



Ryan Patrick Newell

RPN/kah

Enclosures (3)

cc: Barbara Conklin, Esquire (by overnight mail, w/two enclosures)  
David Frederick, Esquire (by overnight mail, w/two enclosures)  
Collins J. Seitz, Jr., Esquire (by hand delivery, w/out enclosures)

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<sup>1</sup> The four basic categories are:

A. Documents relating to: (1) the events leading up to the adoption of the 1905 Compact (including pertinent statements regarding *New Jersey v. Delaware I*); (2) the adoption of the 1905 Compact; (3) events occurring after the adoption of the 1905 Compact relating to activities within the twelve mile circle through *New Jersey v. Delaware II*; (4) attempts to adopt uniform fishing laws between 1905 and 1937; (5) relevant laws at the time of the 1905 Compact; and (6) statements of public officials concerning the 1905 Compact.

B. Documents relating to Delaware agency files that relate to the activities in the Delaware River and Delaware's regulation and enforcement of Delaware laws relating to the Delaware River, including pertinent statements of public officials.

C. Documents relating to police, fire, taxation, and other Delaware regulation in the Delaware River.

D. Documents relating to BP's application to FERC and Delaware to build an LNG facility in Delaware.

**Category A: Documents relating to: (1) the events leading up to the adoption of the 1905 Compact (including pertinent statements regarding New Jersey v. Delaware I); (2) the adoption of the 1905 Compact; (3) events occurring after the adoption of the 1905 Compact relating to activities within the twelve mile circle through New Jersey v. Delaware II; (4) attempts to adopt uniform fishing laws between 1905 and 1937; (5) relevant laws at the time of the 1905 Compact, and (6) statements of public officials concerning the 1905 Compact.**

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**Category B: Documents relating to Delaware agency files that relate to the activities in the Delaware River and Delaware's regulation and enforcement of Delaware laws relating to Delaware River, including pertinent statements of public officials.**

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**Category C: Documents relating to police, fire, taxation, and other Delaware regulation in the Delaware River.**

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**Category D: Documents relating to BP's application to FERC and Delaware to build an LNG facility in Delaware.**

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