

EXHIBIT K

E-Mail from James Tamm to R.J. Cronkhite
dated 11/15/18

Michael Bonvolanta

From: Richard Stokan
Sent: Wednesday, December 05, 2018 4:34 PM
To: Michael Bonvolanta
Subject: FW: Hack v. Milford - Request for Concurrence

From: James Tamm
Sent: Thursday, November 15, 2018 1:00 PM
To: R.J. Cronkhite
Cc: Carolyn Rowland; Richard Stokan
Subject: RE: Hack v. Milford - Request for Concurrence

Mr. Cronkhite,

The reason I have not provided any dates for a Rule 26(f) conference because I understood that the parties were trying to resolve the case. That was why we met with the engineers at your clients property yesterday. At the meeting, the Township's engineering consultant indicated that he would take a week or so to digest the results of the site visit. My preference is that we proceed along the course to resolve the dispute, rather than have our clients incur attorney's fees by engaging in discovery that may not be necessary. Had you brought this up when we were together yesterday, we could have conferred then.

I can meet on Monday, November 19 in my office to formulate a plan. I propose, however, that we wait until after the engineers see if they can agree on a solution. Let me know if you would agree to a conference at a later date. If so, provide my with alternate dates when you are available to meet.



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From: R.J. Cronkhite [mailto:RCronkhite@maddinhauser.com]
Sent: Thursday, November 15, 2018 12:46 PM
To: James Tamm <jetamm@odtlegal.com>; Richard Stokan <rvstokan@odtlegal.com>
Subject: Hack v. Milford - Request for Concurrence

Counsel,

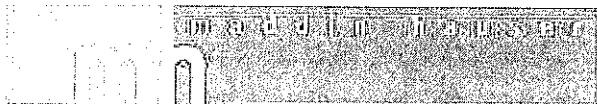
I requested a 26(f) conference on October 24, 2018. I was told that Jim Tamm would not be available until November 5.

Come November 14, 2018, I had not received any follow up and again requested availability for the conference.

It is now November 15 and no dates have been provided.

I am seeking concurrence in a motion to compel the 26f conference and to open discovery. If you seek to avoid the motion, please let me know today by providing times falling in the next week.

R.J.



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