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April 9, 2018

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Honorable John Michael Vazquez  
United States District Judge  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *Bergen Rockland Eruv Association, et al. v. The Borough of Upper Saddle River*, 2:17-cv-05512-JMV-CLW (D.N.J.)

Dear Judge Vazquez:

On behalf of plaintiffs Bergen Rockland Eruv Association, Inc. (“BREA”), Yisroel Friedman, S. Moshe Pinkasovits, Sarah Berger, Moses Berger, Chaim Breuer, Yosef Rosen, and Tzvi Schonfeld (collectively “Plaintiffs”), the undersigned counsel writes to inform the Court that Plaintiffs and Defendant the Borough of Upper Saddle River (“USR”) have entered into a Settlement Agreement resolving all claims asserted against USR in the action entitled *Bergen Rockland Eruv Association, et al v. The Borough of Upper Saddle River*, 2:17-cv-05512-JMV-CLW (D.N.J.) (the “Action”).

Pursuant to the terms of the Settlement Agreement, attached hereto as Exhibit A, the parties have agreed that this Court “shall be requested to retain jurisdiction to enforce the terms of this Agreement.” See Settlement Agreement at ¶ 31. The parties further agreed that Plaintiffs “may seek an order of the Court acknowledging its retention of jurisdiction over this Agreement.” *Id.* Because court protection of Free Exercise rights remains critical to Plaintiffs, Plaintiffs hereby respectfully request that the Court retain jurisdiction over any and all disputes arising or otherwise relating to the construction and enforcement of the Settlement Agreement.

In this regard, Plaintiffs note that the Court has agreed to retain jurisdiction over the settlement agreements reached in the related litigations in Mahwah and Montvale.<sup>1</sup>

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<sup>1</sup> See Order, *Bergen Rockland Eruv Association, Inc., et al v. The Borough of Montvale*, 2:17-cv-08632-JMV-CLW (D.N.J.), (Dkt. No. 16) (Feb. 15, 2018); Order, *Bergen Rockland Eruv Association, Inc. et al v. The Township of Mahwah*, 2:17-cv-06054-JMV-CLW (D.N.J.), (Dkt. No. 24) (Feb. 15, 2018).

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Under the terms of the Settlement Agreement, Plaintiffs will file a stipulation of dismissal of the Action within the agreed-upon seven-day period. *See* Settlement Agreement at ¶ 16. Plaintiffs respectfully request that the Court so-Order this letter request, as well as Plaintiffs' stipulation of dismissal when it is filed.

Respectfully submitted,



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