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March 18, 2022

Via Mail & Email (jburns@dbblegal.com)

James W. Burns, Esquire
Dembo, Brown & Burns LLP
1300 Route 73, Suite 205
Mount Laurel, NJ 08054

RE: Total Site Improvements, LLC
Your File No.: 15643

Dear Mr. Burns:

Eastampton Township Land Use Administrator Kim-Marie White has requested that I respond to your letter directing that all action on the Total Site Improvements, LLC applications cease.

I have been involved with several applications for the development of Block 800, Lots 4.01, 4.01 and 4.03, submitted by your client M&M Land Development, as well as by Total Site Improvements, LLC, with your client's consent. In 2014 there was an application involving the property wherein the managing partner was listed as Michael F. Miller and the member was listed as John A. Murabito. In 2017 the Eastampton Township Planning Board members considered the applications of Total Site Improvements, LLC. On October 18, 2017, Mr. Murabito testified before the Planning Board in support of the applications submitted by Total Site Improvements, LLC, and represented that he was the managing partner. It is my recollection that Mr. Murabito supported several comments critical of Mr. Miller which were made by Thomas Chamberlain, the principal of Total Site Improvements, LLC. As a result of the applications several approvals were granted to Total Site Improvements, LLC.

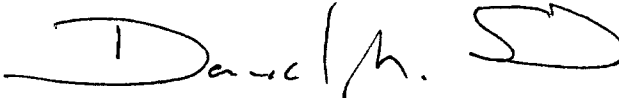
Total Site Improvements, LLC, received a second one year extension to April 18, 2022 of the approvals it had received, conditioned upon the submission of certain applications. As you have noted the applications that

were submitted were deemed incomplete. It is my understanding that revisions are being made, and by copy of this letter I am requesting confirmation of my understanding from Travis Richards, Esquire.

Your letter advises that the "property owner, M and M Land Development, LLC hereby rescinds its consent to the Application filed by Total Site Improvements, LLC." Please advise which member or members, of the owner has rescinded consent to the Application, and pursuant to what authority. I am also requesting that you provide an opinion that my client can comply with your directive that "all action by the Land Use Planning Board on the Application shall cease accordingly" without it being in violation of the Municipal Land Use Law. As consent was given Total Site Improvements, LLC may determine it wishes to proceed pending a challenge by your client. Travis Richards, Esquire, may also wish to share his opinion.

Please feel free to contact me with any questions.

Sincerely,


David M. Serlin, Esquire

DMS/ab

Cc: Kim-Marie White, Eastampton Township Planning Board Administrator
(kwhite@eastampton.com via email only)
Christina Lucas, Eastampton Township Planning Board Secretary
(clucas@eastampton.com via email only)
Stacey Arcari, P.E., Eastampton Township Planning Board Engineer
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