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**PLEASE REPLY TO
WESTPORT OFFICE**

By email to amy.filotto@ct.gov

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Reply to the Response of Summit Saugatuck, LLC

Dear Attorney Filotto:

On July 10, 2019, Attorney Timothy S. Hollister filed a response to the Town of Westport's Statement of Opposition to his Declaratory Ruling Petition.

At the risk of stating the obvious, the Town did NOT use the moratorium as a reason for denying Summit's applications. As we stated in our initial Statement of Opposition, the applications were filed prior to the issuance of the Certificate of Affordable Housing Completion and, as such, were and are grandfathered. That means that the moratorium had absolutely no effect on the applications or the decisions.

In fact Attorney Hollister's characterization of the existence of the moratorium as a "reason for denial" of the proposal is disingenuous at best. It is cited as evidence of Westport's ongoing efforts to increase its stock of affordable housing units and nothing more. A careful reading of Exhibit A of the petitioner's response will confirm the import of the reference.

We stand by our previous position with respect to the other arguments raised in the response.

Thank you.

Sincerely,

Peter V. Gelderman

cc by email: Attorney Timothy Hollister (thollister@goodwin.com); Attorney Mark Branse (branse@halloransage.com); Mr. Michael Santoro (michael.santoro@ct.gov); Attorney Nicholas Bamonte (nbamonte@berchemmoses.com); Attorney Ira Bloom (ibloom@berchemmoses.com).