

The PRUE LAW GROUP P.C.

ATTORNEYS AT LAW

September 4, 2025

Via email and first-class mail

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Kenneth C. Baldwin, Esq.
Robinson & Cole, LLP
One State Street
Hartford, CT 06103

RE: Docket No. 538 – The Towers, LLC application for a telecommunications facility and associated equipment located at 1022 Trumbull Highway in Lebanon, Connecticut

Dear Attorneys Bachman and Baldwin:

This office represents Gregory and Natalie Roy, adjacent property owners to the proposed site of the subject cellphone tower, e.g. 1022 Trumbull Highway, Lebanon, Connecticut. It is my understanding that you represent, respectively, the Connecticut Siting Council and the Applicant in the above-referenced docket. As you are aware, a hearing on the application is scheduled for September 11, 2025. Due to my clients' *untimely* notice of The Towers, LLC application for a telecommunications facility, I am requesting that said hearing be postponed at least **ninety (90) days** to afford my clients adequate opportunity to prepare so that they may participate meaningfully in these proceedings.

I am told that the Applicant believed they had sent notice to my clients on or about April 30, 2025. Admittedly, however, the Applicant realized on August 7, 2025, that notice had not been successfully delivered. On or about that date, the Applicant resent the notice but the Roys did not receive it until **August 18, 2025** – leaving them just barely 3 weeks to research the application and retain counsel. Clearly, the purpose of advanced notice is to afford interested persons sufficient time to prepare for and to be heard at the hearing. At a minimum, Conn. Gen. Stat. § 16-50(b) et. seq. requires that adjacent property owners and other interested parties be sent notice, not later than one week after fixing the date of the hearing or not less than 30 days prior to the hearing date, whichever is later. Should the hearing not be postponed, the Roys will be unfairly prejudiced.

Due to the proximity of the tower to the Roys' property (i.e. 700 feet), the Roys will be most impacted. They have valid concerns that the tower will not only cause them to suffer a significant devaluation in the fair market value of their property but also the loss of the quiet enjoyment of their home. As such, they hereby reserve any and all rights to pursue compensation should the Applicant be successful in its application to build the tower as proposed.

In conjunction with our request for postponement of the hearing, enclosed please find my clients' Application for Intervenor Status pursuant to C.G.S. § 4-177a. Should you have any questions regarding the information herein, please contact me at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maria C. Barall". The signature is fluid and cursive, with the first name "Maria" being more prominent than the last name "Barall".

Maria C. Barall, Esq.

MCB/ka
Enclosure