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City of Harrisburg
Office of the City Solicitor

October 26, 2010

Fred A. Reddig
Executive Director
Department of Community and Economic Development
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225

Re: City of Harrisburg Request for Determination of Distress Under Act 47

Dear Mr. Reddig:

As response to Attorney Grover's letter of October 21, 2010 reiterating his objections to the written testimony Mr. Hudson and Mr. Shenck, I oppose such objection and request that you afford, in your judgment, whatever evidentiary weight the written testimony merits. As to Attorney Grover's request to submit proposed findings of fact, conclusions of law and argument, written or oral, within a reasonable time after the close of the record, I likewise oppose. It is my contention that all matters of fact and law will have been determined at the time that the record is closed and no further deliberations in this matter will necessary.

Sincerely,

Philip Harper

Encl.

Cc: Neil A. Grover, Esquire
Steven Fishman, Esquire

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Via Email As Instructed

October 21, 2010

Fred A. Reddig
Executive Director
Department of Community & Economic Development
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225

Re: City of Harrisburg Request for Determination of Distress Under Act 47

Dear Mr. Reddig:

Under the short deadline provided, I have been able to draft three (3) of the properly and timely presented oral motion I made last evening. By this letter, I reiterate our objections to the written testimony of Mr Hudson and Mr. Shank that you reported from the bench. These witnesses did not make themselves available for cross-examination and so their hearsay submissions should be stricken. I also request the write to submit proposed findings of fact, conclusions of law and argument, written and oral, within a reasonable time after the close of the record.

Sincerely,

LAW OFFICE OF NEIL A. GROVER

Neil A. Grover

NAG/

Encs.

cc: Steven Fishman, Esquire, Chief Counsel, DCED
Philip Harper, Esquire, City Solcitor