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ANNE MILGRAM
Acting Attorney General

September 5, 2006

By Electronic and First-Class Mail

Ralph J. Lancaster, Jr.
Pierce Atwood
One Monument Square
Portland, Maine 04101

Re: State of New Jersey
v. State of Delaware, No. 134,
Original Progress Report

Dear Mr. Lancaster:

Pursuant to the Case Management Plan, New Jersey respectfully submits this Progress Report. Since the case management conference of August 8, 2006, New Jersey has done the following:

1. Responded to discovery issues raised by Delaware on August 2, 2006, by letter of August 8, 2006.
2. Propounded New Jersey's Requests for Admissions, on August 11, 2006.
3. Responded to Delaware's Second Set of Interrogatories and Requests for Production of Documents, on August 14, 2006.
4. Corresponded with Delaware regarding discovery issues on August 25, 2006 and August 31, 2006.
5. Reviewed and started drafting responses to Delaware's Requests for Admissions.



September 5, 2006

Page 2

6. Continued its additional research in support of New Jersey's position in this case.

New Jersey is continuing to correspond with Delaware regarding discovery issues, and continuing to attempt to resolve them without the intervention of the Special Master.

Sincerely yours,

ANNE MILGRAM
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: _____
Rachel Horowitz
Deputy Attorney General

c: David Frederick, Esq. (By e-mail and first-class mail, 3 copies)
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