



JON S. CORZINE
Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 112
TRENTON, NJ 08625-0112

ZULIMA V. FARBER
Attorney General

March 6, 2006

By E-Mail and First-Class Mail

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

Re: New Jersey v. 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 February 6, 2006, New Jersey has done the following:

1. Submitted its issues of law on February 10, 2006;
2. Conferred with Delaware on February 17, 2006, on issues related to discovery and document production, including Delaware's concerns related to assistance from New Jersey Archives;
3. Started preparation of New Jersey's Initial Disclosures, to be filed by March 31, 2006;
4. Started preparation of New Jersey's motion related to certain issues of fact and law raised by Delaware in its letter of February 17, 2006, as specified in Case Management Order No. 2. Pursuant to that Case Management Order, New Jersey's motion shall be filed by March 20, 2006; and



March 6, 2006
Page 2

5. Engaged in additional research in support of New Jersey's position in this case.

We look forward to speaking with you at the case management conference on March 8, 2006.

Sincerely yours,

ZULIMA V. FARBER
ATTORNEY GENERAL OF NEW JERSEY

By: *Rachel Horowitz*
Rachel Horowitz
Deputy Attorney General

c: David Frederick, Esq. (e-mail and first-class mail, 3 copies)
C.J. Seitz, Esq. (e-mail and first-class mail, 2 copies)