

RING, RUDNICK & GREFE, P.C.

ATTORNEYS AND COUNSELLORS AT LAW
1350 PRUDENTIAL TOWER
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199-8001

TELEPHONE: 617-437-1700
TELECOPIER: 617-437-7660

RECEIVED BY
OFFICE OF CITY CLERK
1990 JAN 10 AM 9:58
CAMBRIDGE, MA
IN THE DISTRICT OF COLUMBIA
500 PENNSYLVANIA AVENUE N.W.
SUITE 118
WASHINGTON, D.C. 20016
202-895-2607

January 9, 1990

BY HAND DELIVERY

Mr. Robert W. Healy, City Manager
Cambridge City Hall
795 Massachusetts Avenue
Cambridge, Massachusetts 02139

Mr. Joseph E. Connarton, City Clerk
Cambridge City Hall
795 Massachusetts Avenue
Cambridge, Massachusetts 02139

Dear Messrs. Healy and Connarton:

This office represents the owners of certain property located in the City of Cambridge and which are the subject of an ordinance which amends 8.44.020 of the Cambridge Municipal Code. The properties that are owned by my clients are located at 14, 16, 18, 20, and 22 Dudley Street, Cambridge, Massachusetts.

My clients have been advised that there was an order scheduled to come before the City Council on the evening of January 8, 1990, that describes certain alleged procedural and substantive flaws in the passage of the amendment above-referenced. It is my understanding that the City has been previously advised by counsel and otherwise that the ordinance was properly enacted pursuant to the requirements of law. My clients are further advised that a law suit is now pending in Middlesex Superior Court Department of the Trial Court testing the validity of the enactment. Any order that might, is entered as indicated by the agenda of January 8, 1990, would seemingly be entered solely for the purposes of affecting the Superior Court litigation and to deprive my clients, as well as others similarly situated, of their property rights based solely on illegitimate political motives.

My clients respectfully suggest to you that a law suit is without any merit whatsoever, and that the present City Council should refrain from taking action that could be construed as a bootstrap argument to justify the frivolous litigation.

RECEIVED
90 JAN -9 PM 3:19
OFFICE OF THE CITY MANAGER

Messrs. Robert W. Healy and Joseph E. Connarton
January 9, 1990
Page Two

My clients are prepared to defend the property rights that they possess. They anticipate, however, that the City Council will do nothing to interfere with those rights and that the Superior Court will make a speedy determination that the lawsuit is in fact meritless.

Very truly yours,


Philipp G. Grefe
geh

PGG/jeh

RING, RUDNICK & GREFE, P.C.

ATTORNEYS AND COUNSELLORS AT LAW

1350 PRUDENTIAL TOWER

800 BOYLSTON STREET

BOSTON, MASSACHUSETTS 02199-8001

TELEPHONE: 617-437-1700

TELECOPIER: 617-437-7660

IN THE DISTRICT OF COLUMBIA

5010 WISCONSIN AVENUE N.W.

SUITE 118

WASHINGTON, D.C. 20016

202-895-2607

January 9, 1990

BY HAND DELIVERY

Mr. Robert W. Healy, City Manager
Cambridge City Hall
795 Massachusetts Avenue
Cambridge, Massachusetts 02139

Mr. Joseph E. Connarton, City Clerk
Cambridge City Hall
795 Massachusetts Avenue
Cambridge, Massachusetts 02139

Dear Messrs. Healy and Connarton:

This office represents the owners of certain property located in the City of Cambridge and which are the subject of an ordinance which amends 8.44.020 of the Cambridge Municipal Code. The properties that are owned by my clients are located at 14, 16, 18, 20, and 22 Dudley Street, Cambridge, Massachusetts.

My clients have been advised that there was an order scheduled to come before the City Council on the evening of January 8, 1990, that describes certain alleged procedural and substantive flaws in the passage of the amendment above-referenced. It is my understanding that the City has been previously advised by counsel and otherwise that the ordinance was properly enacted pursuant to the requirements of law. My clients are further advised that a law suit is now pending in Middlesex Superior Court Department of the Trial Court testing the validity of the enactment. Any order that might, is entered as indicated by the agenda of January 8, 1990, would seemingly be entered solely for the purposes of affecting the Superior Court litigation and to deprive my clients, as well as others similarly situated, of their property rights based solely on illegitimate political motives.

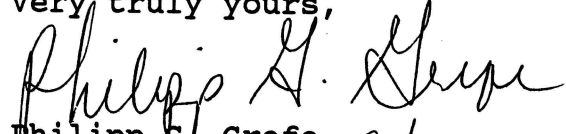
My clients respectfully suggest to you that a law suit is without any merit whatsoever, and that the present City Council should refrain from taking action that could be construed as a bootstrap argument to justify the frivolous litigation.

RECEIVED BY
OFFICE OF CITY CLERK
1990 JAN -9 PM 2:48
CAMBRIDGE MA.

Messrs. Robert W. Healy and Joseph E. Connarton
January 9, 1990
Page Two

My clients are prepared to defend the property rights that they possess. They anticipate, however, that the City Council will do nothing to interfere with those rights and that the Superior Court will make a speedy determination that the lawsuit is in fact meritless.

Very truly yours,


Philipp G. Grefe *gh*

PGG/jeh

8. 0-9

Comm. from Philipp G. Grefe, Ring, Rudnick & Grefe, P.C. representing owners of properties located at 14, 16, 18, 20 and 22 Dudley Street, stating that the law suit is without merit against Ordinance No. 1093.

In City Council,

January 22, 1990

Placed on file