

# CARUSO SMITH PICINI

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## MEMORANDUM

**TO: Joseph Cortico, Local President - Elizabeth Education Association**

**FROM: Timothy Smith**

**RE: Deadline Extension for Acceptance of the Terms of the K-8 Settlement Agreement**

**DATE: June 14, 2018**

This is to confirm that through your efforts, the Board of Education has agreed to extend the date by which affected members must accept the terms of the Settlement Agreement through August 31, 2018.

In return, the Elizabeth Education Association has agreed to extend the date by which the Board must accept or reject the claims contained within the previously submitted and continually developing master spreadsheet through the same date – August 31, 2018.

The parties have further agreed that their respective accountants will maintain an open dialogue throughout this process and through whatever means necessary, including electronic and/or telephonic communication(s), in person meeting(s), exchange of relevant information, etc., in a good faith effort to resolve any discrepancies in the amount of the claims submitted.

Our attorneys will also remain committed to working diligently with you, your fellow representatives, and members, over the ensuing months to facilitate this reconciliation process, in furtherance of an unwavering objective of having each and every claim honestly considered on its merits, and honored where deserved.

If, however, upon conclusion of this process it is determined that there exists claim(s) that have not been reconciled, and it is apparent that the failure to honor them is in violation of the spirit of the Settlement Agreement, we will remain committed to pursuing those claims through appropriate legal channels.

Thank you Sir. Please do not hesitate to contact us should you have any further questions.