



December 28, 2020

VIA ELECTRONIC CASE FILING

Honorable Esther Salas
United States District Court for the
District of New Jersey
Martin Luther King, Jr. Federal Bldg. & U.S. Courthouse
50 Walnut St.
Newark, NJ 07102

SO ORDERED

s/Esther Salas

Hon. Esther Salas, U.S.D.J.

Date: December 29, 2020

Re: *Halley, et al. v. PPG Industries, Inc.*
Civ. Action No. 2:10-cv-3345 (ES) (JAD)

Dear Judge Salas:

Plaintiffs and Defendant PPG Industries, Inc. (the “Settling Parties”) respectfully request that the deadline for settlement Class Members to submit a Claim and Release with ownership documentation for participation in the Settlement be extended 10 days until January 8, 2021 (the Friday before the January 13, 2021, Fairness Hearing). The current deadline is December 29, 2020, pursuant to one prior extension. D.E. 497. This request will have no impact on any other date or deadline. The parties will provide the Court with a current count of claims at the Fairness Hearing.

This request comes at the request of the Morris Canal Coalition (“MCC”), an ostensible organization of Jersey City residents with members in the Settlement Class. During a December 23 teleconference, and a December 27 Zoom videoconference with Settlement Class counsel, MCC attendees stated that other members of MCC might need additional time to submit their Claims and that others may not have received notice of the Settlement. Although MCC did not provide evidence of any particular resident needing such an extension, of any resident not receiving notice, or of any deficiency in the Court-approved Notice procedure, the Settling Parties support this extension to the extent it will help to increase participation in the Settlement. *See* D.E.489-2 ¶IV(3)(d). Class Counsel will again provide notice of this extension via an advertisement in the Jersey Journal and web notice, which will further encourage participation in the Settlement.

Thank you for Your Honor’s consideration. If this is agreeable to the Court, we respectfully request that Your Honor endorse this letter, “So Ordered.”

Respectfully submitted,

/s/ Steven J. German
Counsel for Plaintiffs

/s/ Joseph F. Lagrotteria
Counsel for PPG