



*Mail to:*

James L. Plosia, Jr.  
Jonathan F. Cohen  
Donald S. Dinsmore  
Veronica A. Acevedo  
Rasheta T. Butler

51 Gibraltar Drive,  
Suite 3B  
Morris Plains, NJ 07950  
(908) 888-2547 (p)  
(908) 548-0811 (f)  
[www.pclawnj.com](http://www.pclawnj.com)

Monmouth County:  
1129 Broad Street  
Shrewsbury, NJ 07702

June 13, 2026

**Via email**

John Certo

[opra+request-83838-01787725@requests.opramachine.com](mailto:opra+request-83838-01787725@requests.opramachine.com)

Re: Open Public Record Act ("OPRA") Request – 251201E

Dear Mr. Certo:

As you are aware, our office represents the Borough of Matawan ("Borough"). Please accept this correspondence in response to your Open Public Records Act ("OPRA") request you submitted to the Borough. You requested the following records:

*I request all Borough Attorney billing records, legal invoices, itemized statements, time entries, billing descriptions, memoranda, and all legal communications related to legal services performed for the Borough of Matawan from January 1, 2024 to the present. This request includes all outside attorneys, special counsel, redevelopment counsel, bond counsel, labor counsel, conflict counsel, Cannabis Counsel, and any other attorney or law firm that billed or advised the Borough in any capacity. This request includes but is not limited to the following:*

*1. All attorney billing records:*

- All invoices, itemized bills, time entries, dates of service, descriptions of work performed, hours billed, and total amounts charged.*

- *All billing records from the Borough Attorney, special counsel, outside counsel, Cannabis Counsel, redevelopment counsel, land use counsel, bond counsel, labor counsel, conflict counsel, and any attorney or law firm under contract or engagement with the Borough.*

*2. All legal communications with Borough officials:*

- *All emails, letters, memos, and correspondence between any attorney and Borough officials including the Mayor, Borough Administrator, Councilmembers, Municipal Clerk, CFO, DPW, Engineering, Planning, Zoning, Construction, or any staff member.*
- *All communications referencing legal advice, risk assessments, disputes, litigation exposure, redevelopment, bonding, personnel issues, cannabis licensing or cannabis zoning, OPRA compliance, or OPMA issues.*

*3. All attorney communications referencing the requestor (John Certo):*

- *All emails, memos, correspondence, notes, or discussions that reference “Certo,” “John Certo,” “OPRA Certo,” “records request,” or any internal discussion about responding to or handling OPRA requests from the requestor.*

*4. All legal communications involving OPRA:*

- *All emails, memos, and notes where attorneys advised on OPRA responses, OPRA delays, OPRA extensions, OPRA redactions, OPRA denials, and OPRA procedures.*

- *All internal guidance given to staff on OPRA compliance.*

*5. All communications relating to executive session legal topics:*

- *All attorney correspondence concerning anticipated litigation, pending litigation, contract negotiations, real estate transactions, redevelopment issues, cannabis applications, or personnel matters.*
- *All summaries or discussions of legal topics presented during executive session.*

*6. All legal work relating to Bond Ordinances 25-18 and 25-19:*

- *All billing entries, emails, memos, drafts, and communications relating to bond preparation, financial structure, property acquisition, negotiations, or debt service impact.*
- *All legal work related to land acquisition or redevelopment associated with these ordinances.*

*7. All legal work involving Cannabis Counsel:*

- *All invoices, time entries, correspondence, reviews, legal opinions, or memos involving cannabis licensing, cannabis zoning, cannabis redevelopment, cannabis business applications, cannabis approvals, cannabis-related property reviews, or Borough cannabis ordinances.*

*8. All legal work involving public comments, public criticism, communications strategy, or resident disputes:*

- *Any billing or correspondence related to communication strategy, public messaging, political issues, public reaction, or interactions with residents.*

The Borough has identified records responsive to Items 1, 2, and 6 of your request. Enclosed please find legal invoices and email correspondence responsive to those portions of the request.

Please be advised that certain information has been redacted from the produced records pursuant to applicable exemptions under OPRA, including attorney-client privileged communications and personal identifying information. Please refer to the enclosed log for additional information regarding the redactions made.

The Borough continues to review records responsive to the remaining items of your request and is in the process of completing the necessary review and redactions. The remaining responsive records will be provided on a rolling basis as that review is completed. Accordingly, this correspondence constitutes a partial response to your request. The Borough reserves the right to supplement this response with additional responsive records and/or applicable exemptions as its review continues.

Should you have any questions regarding this response, please do not hesitate to contact this office.

PLOSIA COHEN LLC

By: /s/ Veronica A. Acevedo  
Veronica A. Acevedo, Esq.