



# COUNTY OF UNION

OFFICE OF THE COUNTY COUNSEL

*Robert E. Barry, Esq., County Counsel*

March 9, 2015

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*County Counsel*

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**VIA HAND DELIVERY**

Honorable Camille M. Kenny, J.S.C.

Union County Courthouse

2 Broad Street

Elizabeth, New Jersey 07207

**RE: Renna v. County of Union and Marlana Russo**

**Docket No: UNN-L-3253-14**

Dear Judge Kenny:

Attached please find a certified Vaughn Index on behalf of defendants, County of Union and Marlana Russo, as requested by Your Honor, regarding the above-referenced matter. In addition to the Vaughn Index, please find a Certification of Christopher Scaturro, an amended table indicating attachments that were previously disseminated, and a document identifying attachments to the Plan which are currently unavailable.

Thank you.

Very truly yours,

Brian P. Trelease, Esq.  
Assistant County Counsel

CC: Walter M. Luers, Esq. (via regular mail)

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Attorney for Defendants,  
County of Union and Marlena Russo

By: **Brian P. Trelease, Esq.**  
Assistant County Counsel  
Attorney ID#: 02135-2009

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TINA RENNA

Plaintiff,

vs.

UNION COUNTY and MARLENA M.  
RUSSO, in her official capacity as the  
Information Assistant and Records Custodian  
of UNION COUNTY

Defendants.

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY  
DOCKET No.: UNN-L-3253-14

CIVIL ACTION

**CERTIFICATION OF  
CHRISTOPHER SCATURO**

I, **CHRISTOPHER SCATURO**, certify and say:

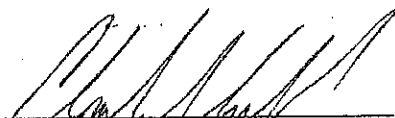
1. I am employed as Director of the Division of Emergency Services for the County of Union's Department of Public Safety. I am intimately familiar with the contents of the County of Union's Emergency Operations Plan. As such, I am familiar with this matter.
2. The attached document is a Vaughn Index relative to the County of Union's Emergency Operation Plan regarding this matter as requested by Your Honor.
3. The Vaughn Index briefly describes the annexes and attachments of the Emergency Operations Plan and the exemptions from public disclosure regarding same.

4. I have reviewed the attached Vaughn Index and hereby submit that the documents listed and the exemptions noted are true and accurate.

I hereby certify that the foregoing statements made by me are true. If any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

7/9/15

  
CHRISTOPHER SCATURRO

**Public Documents – County claims no exemption to the following:**

<b>ANNEX</b>	<b>ATTACHMENT</b>	<b>NOTES</b>
Basic Plan	BPA-1	
Damage Assessment	DAA-1	
Emergency Operations Center	EOCA-2	
Emergency Operations Center	EOCA-3	
Emergency Management	EMA 7&8	EMA 7 contains two (2) separate documents: the document that the County is not exempting is 2004 agreement between NY and NJ introduced via resolution. Please see the Vaughn Index regarding other document listed as EMA 7
Emergency Public Information	EPIA-1	
Emergency Public Information	EPIA-3	
Fire and Rescue	FRA-1	
Fire and Rescue	FRA-4	
Fire and Rescue	FRA-6	Information regarding shelter locations should not be disclosed
Public Health	PHA-1	
Public Health	PHA-3	
Resource Management	RMA-8	
Shelter and Reception	SCRA-4	
Social Services	SSA-1	
Social Services	SSA-3	
Social Services	SSA-5	
Social Services	SSA-6	
Terrorism Incident	CTI-1	
Terrorism Incident	CTI-2	

**ATTACHMENTS TO PLAN NOT AVAILABLE**

The following documents are unavailable for various reasons; therefore, they are not in the custody of the County of Union:

BPA-2  
BPA-8  
BPA-9

ACWA-4

DAA-3  
DAA-4

EOCA-6

EMA-2  
EMA-3  
EMA-4  
EMA-6

EPIA-4  
EPIA-5  
EPIA-6

EA-4  
EA-6  
EA-7  
EA-10

PWA-3  
PWA-5

RPA-1

RMA-3  
RMA-4  
RMA-5

SCRA-1  
SCRA-3  
SCRA-5

SSA-2

CTI-3  
CTI-4  
CTI-5