



COUNTY OF UNION

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Robert E. Barry, Esq., County Counsel

June 13, 2012

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Honorable Regina Caulfield, J.S.C.
NJ Superior Court- Union County
2 Broad Street
Elizabeth, NJ 07201

**Re: Renna v. County of Union
Docket No. UNN-L-1431-12
Order to Show Cause**

Dear Your Honor,

I represent the County of Union, in the above captioned matter. In this case, Plaintiff filed an Order to Show Cause seeking access to the Union County Police's investigatory file on Patrick Scanlon, Jr. The County of Union, in response to Plaintiff's Order to Show Cause submitted a certification of Lieutenant James Christopher Debbie in support of our position that plaintiff's OPRA request was properly denied pursuant to OPRA criminal investigatory record exemption. However, plaintiff's counsel in his reply papers indicates that the Defendant should be ordered to submit a Vaughn Index.

In an effort, to support judicial economy on behalf of the County of Union we submit the attached Vaughn index. Thank you for your attention to this matter.

Respectfully Submitted,

Moshood Muftau, Esq.
Assistant County Counsel

cc. Walter Luers via fax

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VAUGHN INDEX

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2/2/12	Transaction Form	Fax from witness	5,6	
2/6/12	Operation Rpt.	Interview of potential witnesses/employee	7	NJSA 47:1A-1.1
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