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Newark ■ Chicago ■ Philadelphia

April 11, 2019

VIA ECF

Honorable Michael A. Shipp, U.S.D.J.
United States District Court for the
District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street, Room 7W
Trenton, New Jersey 08608

**Re: *In re New Jersey Tax Sale Certificates Antitrust Litig.*,
Master Docket No. 3:12-CV-01893-MAS-TJB**

Dear Judge Shipp:

Together with our co-counsel, this office represents Plaintiffs and the class in this matter. We write in response to the anonymous letter to the Court dated April 2, 2019, which was posted on ECF this afternoon. ECF No. 512. We understand and share the frustration of the writer with the pace of the claim review process, but the writer's charges against Class Counsel are uninformed and unfounded.

The Court-appointed Settlement Administrator, Gilardi & Co, LLC, has been handling the many claims that class members filed, applying the objective, Court-approved formula for distributions to each claim that was also set forth in the notice sent to each class member. The claims process is thus a complex one that has not gone as speedily as Class Counsel had hoped. It has been complicated by the fact that some claims were incomplete or suspicious, which has required further review and investigation in order to avoid paying fraudulent or excessive claims that would diminish the shares of class members with legitimate claims. Class Counsel have been and continue to be carefully overseeing the process.

As the Court is aware, distributions in complex class actions often take significant time. For that reason, and contrary to the claim of the anonymous writer, Class Counsel have never promised distributions by a specific date. Class Counsel believe that the paramount goal is to ensure that each class member receives the amount to which he, she, or it is entitled under the settlement, no more and no less. Class Counsel have directed Gilardi to ensure that result.



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In no sense will “whatever amount [Class Counsel] desire” be distributed, as the anonymous writer asserts. On the contrary, once Gilardi completes its work, including necessary auditing of claims submitted, and Class Counsel have reviewed that work, Class Counsel will file a motion for Court approval of the distribution. The anonymous letter refers to such a motion, but the writer appears to have mistakenly believed that the motion has already been filed.

Class Counsel have acted and will continue to act with transparency. There is simply no basis for the anonymous writer’s accusations. Like the writer, Class Counsel would like distributions to class members to occur as soon as possible, and we regret that the claim review process has taken as long as it has.

Should the Court wish to address any issue with Class Counsel, we stand ready to do that at the Court’s convenience. Thank you very much for your consideration.

Respectfully,

/s/ Bruce D. Greenberg

Bruce D. Greenberg

bdg/abm

cc: All Counsel of Record (via ECF)