

# THE BEEKMAN LAW FIRM, LLC

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DONALD L. BEEKMAN (1949-2017)

April 17, 2020

Kristie Dickert, Board Secretary  
Bradley Beach Board of Adjustment  
701 Main Street, Municipal Building  
Bradley Beach, New Jersey 07720

Re: Development Application—Bd. Of Adjustment  
Ralph Giacobbe & Fiorella Giacobbe  
202 Fourth Avenue, Bradley Beach, NJ  
Block 53, Lot 12, Borough of Bradley Beach

Dear Mrs. Dickert:

The above application, which was originally scheduled for a hearing on Thursday, March 26, 2020, was carried to the April 16, 2020 Board of Adjustment meeting. Subsequently we received direction and published notice for the virtual hearing on April 30, 2020 as well as sending notice to the property owners, utilities, clerk, etc., as required by the Municipal Land Use Law and Certified List provided by the Borough's offices. The Affidavit of Service will be submitted by electronic means no later than April 24, 2020, since the mailing date was April 16, 2020. Therefore there will be sufficient time to receive some of the return receipt ("Green") cards and incorporate with that filing.

In addition, pursuant to the Board of Adjustment's requirements, please be advised of the following that the Applicant will rely upon in connection with this application, and all documents will be emailed electronically as soon as possible.

## **A. Witness List:**

1. Ralph and/or Fiorella Giacobbe (Applicants/Property Owners)
2. Mary B. Hearn (Applicant's Architect)  
M.B. Hearn Architecture, LLC  
1007B Main Street  
Belmar, New Jersey 07719  
732-556-9055

**B. Exhibit List:**

1. Zoning Board of Adjustment Application for Appeal and for Variance
  - 1A. Explanation of Appeal
  - 1B. Zoning Denial
  - 1C. Ordinance Section cited by Zoning Officer in Zoning Denial
  - 1D. Key Map
  - 1E. Survey prepared by Michael J. Willaims PLS dated June 26, 2019
  - 1F. Architectural Plans prepared by M.B. Hearn Architecture, LLC dated 12/19/2019
  - 1G. First (1<sup>st</sup>) Revision of Architectural Plans prepared by M.B. Hearn Architecture, LLC revised to 2/3/2020 – Cover Page Only
2. Property Card – highlighted
3. Witness & Evidence List (this letter) dated 4/17/2020.
4. Affidavit of Service and Exhibits

Thank you for your concern in this matter, and please do not hesitate to contact me with any questions or concerns. If you should require any duplicate copies of any of these documents, please advise and we will submit for the Board's records.

Very truly yours,



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Jeffrey P. Beekman

JPB

Encl.

CC: Client (via e-mail)  
M.B. Hearn Architecture, LLC (via email)