

RACKEMANN
SAWYER & BREWSTER
PROFESSIONAL CORPORATION
COUNSELLORS AT LAW

Established 1886

Gordon M. Orioff
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February 3, 2020

BY FEDERAL EXPRESS

Cathy J. and Christopher Campbell
35 Burns Avenue
Walpole, MA 02081

Re. Rights in Private Portion of Burns Avenue, Walpole, MA

Dear Mr. and Mrs. Campbell:

I am writing on behalf of our clients Wall Street Development Corp. and Burns Avenue Development LLC (together, the "Developer"), who are the owners of Walpole Assessor Map 20, Parcel 136 (48 Burns Avenue) and Walpole Assessor Map 20, Parcel 137 (together, the "Property"). As you likely know, Burns Avenue, formerly known as Jennings Avenue, extends easterly from Pleasant Street 500 +/- feet as a public way. Thereafter, Burns Avenue is a private way (the "Private Way").

Based on the facts and circumstances related to the Private Way and the applicable law, Developer has the right to travel over the Private Way from the public portion of Burns Avenue to reach the Property and also to grade, pave and otherwise improve the Private Way by installing utilities and other infrastructure to benefit future development on the Property.

It is my understanding that, without any legal justification, you nevertheless have objected to Developer's use of the Private Way for the above purposes. Your objections are without merit and continued representations that the Developer lacks the foregoing rights will damage its ability to develop the Property in accordance with those rights.

It goes without saying that the costs of a lawsuit to affirm the Developer's rights in the Private Way will be significant to both you and my clients, in addition to any other potential damages the court may award my clients. It would be in the interest of all parties to avoid the substantial expenses of such a case. Therefore, this letter is to reach out to ask that you contact me to determine whether the parties can reach a mutually agreeable solution regarding Developer's use of the Private Way.

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