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May 18, 2010

VIA CERTIFIED MAIL (RRR) AND REGULAR MAIL

Paul S. Kaplan
10 Parktown Place
Sicklerville, NJ 08081-4226

**RE: Video Taping of Township Meetings
Our File No. 8372**

Dear Mr. Kaplan:

Further to our discussions several weeks ago, I advised you that while you have a right to tape public meetings, you did not have a right to tape or view my lap top computer screen as it contains attorney-client privileged information or other information which I as the Winslow Township Solicitor have a right to not have videotaped or publicly disseminated. During that discussion, you agreed not to shoot your camera at my lap top computer screen, and if it did appear in your video taping, you would excise it and not publicly disseminate it.

I have recently reviewed your sponsored website, "Unofficially Winslow" where not only did you tape my lap top computer screen, you have publicly disseminated it. You have also positioned yourself at Winslow Township Public meetings with your videotape equipment directly behind me in order to videotape and/or photograph my lap top computer screen.

Accordingly, I request that you remove from your website the photo and video of my lap top computer screen immediately. Also, I request that you cease and desist videotaping and/or photography of my lap top computer screen for the reasons stated above.

Very truly yours,


STUART A. PLATT
For the Firm

SP/ch

cc: Mayor Metzner and Township Committee
Deborah A. Puchakjian, RMC – Township Clerk
Joseph Gallagher, Jr., Township Administrator

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Paul S Kaplan

From: "Paul S. Kaplan" <N2FOB @ARRL.NET>
To: "Stuart" <sapesq@marrazzoplattlaw.com>
Cc: <russellbates@winslowtownship.com>; <mayormetzner@winslowtownship.com>;
 <marielawrence@winslowtownship.com>; <karengibison@winslowtownship.com>;
 <johnwilson@winslowtownship.com>; "Joe Gallagher" <jgallagher@winslowtownship.com>;
 <emcglinchey@winslowtownship.com>; "Debbie Puchakjian"
 <dpuchakjian@winslowtownship.com>; <charlesflamini@winslowtownship.com>;
 <barrywright@winslowtownship.com>; "Ayscue Clips" <editor@ayscueclips.com>;
 <joe@marrazzoplattlaw.com>
Sent: Wednesday, May 19, 2010 5:44 PM
Subject: Video Taping of Open Public Meetings

Mr. Platt,

I have received your ridiculous letter regarding my video taping the Township meetings. I responded to you with a voice mail message, however for the benefit of the others I'm putting it in writing to you.

1) I asked you in my voice mail message to be more specific of what video taping is of your laptop. For I do not recall seeing your laptop, but never the less I will review the video and remove anything that has your laptop displayed.

2) I did not move my seat from the isle to the front for any reason that your claiming to be concerning your laptop. I moved my seat for I'm getting old and can't see! And more importantly have a hard time hearing. I further explained in my voice mail message that you are not the target of my recording. You are not a public official. You are nothing but highered help. I think you a poor lawyer, with poor judgment. I am entitled to that opinion. However the forum of UNofficially Winslow is not the place to address a poor attorney. I also mentioned in my message to you that I'm familiar with the proper avenues of addressing incompetent attorneys and in the process of addressing that issue in the proper venue. What was it a slow week for you and need to create additional billing? That is exactly what my complaint addresses with the State of New Jersey. Go ahead, bill for this nonsense so I can OPRA that too.

3) In an effort to put your self conscious mind at rest, I will make every effort to move my video taping operation to the right side of the court room. So that I'm not behind you. Of course if there is seating available on that side. As I was seated there a few meetings ago.

Mr. Platt, grow up and try to act like an attorney.

Sincerely,

Paul S. Kaplan

P.S.

I intend to move my seat like I mentioned above, and it is true the conversation you mentioned in your opening paragraph. However, as in the past, you have not done your homework because there is case law on this very subject. Your laptop is in plain view in a public meeting and case law says you have the responsibility to secure your materials in a public setting.

5/19/2010

Paul S Kaplan

From: "Paul S. Kaplan" <N2FOB@ARRL.NET>
To: [REDACTED]
Cc: "Stuart" <sapesq@marrazzoplattlaw.com>; <russellbates@winslowtownship.com>; "Public Works" <publicworks@winslowtownship.com>; "Patricia Ward" <pward@winslowtownship.com>; <momfish5@comcast.net>; <mayormetzner@winslowtownship.com>; <marielawrence@winslowtownship.com>; <karengibison@winslowtownship.com>; <johnwilson@winslowtownship.com>; "Joe Gallagher" <jgallagher@winslowtownship.com>; <emcglinchey@winslowtownship.com>; "Debbie Wells" <dwells@winslowtownship.com>; "Debbie Puchakjian" <dpuchakjian@winslowtownship.com>; <charlesflamini@winslowtownship.com>; <barrywright@winslowtownship.com>; <anthonytomaseello@winslowtownship.com>; "Ayscue Clips" <editor@ayscueclips.com>
Sent: Wednesday, May 19, 2010 6:19 PM
Subject: School #1 Plead Video taping at Twp. Meeting

[REDACTED]

Stuart Platt, the Township attorney, is complaining that I captured his laptop during my video taping of a the Township meeting.

While I explained to Mr. Platt that I have not video taped his laptop, nor do I give a crap about his laptop for he is not a public official, but rather highered help. I did tell Mr. Platt I would review the videos currently on UNofficially Winslow to double check if I inadvertently caught his laptop.

As it turns out, while your son was giving his plea for school #1 to remain open, Mr. Platt's laptop can be scene at a 45 degree angle to the camera. And the laptop screen is blurry.

Therefore I have removed the video of your son from the website. However this matter is not at rest. Not by a long shot. I am in progress of filing a complaint against this attorney, Mr. Platt with the State of New Jersey. The letter I received today from Mr. Platt, which I can share with you, just adds fuel to the fire to help me substantiate my claim to the State.

I plan to use this video of your son along with the letter I received from Mr. Platt today to show how ridiculous this attorney can be.

I further explained in my response to Mr. Platt that there is case law of this exact matter. Mr. Platt's computer screen is in view of the public, during a public meeting. It does not qualify for attorney client privilege as he is claiming.

I hope you enjoyed your son's clip on the site for the past several weeks. I think I, and the public, can get more mileage out of this video dealing with Platt and his nonsense then fighting with him about how nothing can be seen on the display of his laptop in the video.

In my opinion, Platt is just an incompetent, self conscious attorney.

Sorry,

Paul

5/19/2010