

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

80,794 SQUARE FEET OF LAND, MORE
OR LESS, SITUATED IN THE CITY OF
HARRISBURG, DAUPHIN COUNTY,
COMMONWEALTH OF
PENNSYLVANIA, AND REILY STREET
ASSOCIATES INC., *et al.*,

Defendants.

Civil No. 1:18-CV-532

Judge Cathy Bissoon (W.D. Pa.)

Tract Nos. Tax Map 07-026-020
Tax Map 07-102-033
Tax Map 07-102-034

STIPULATION REGARDING ALTERNATIVE DISPUTE RESOLUTION

Pursuant to this Court's Case Management Order (Dkt. 64), Plaintiff United States of America and Defendant Reily Street Associates, Inc. (collectively the "Parties") hereby submit their preferences regarding Alternative Dispute Resolution as follows:

1. The Parties have agreed to retain the services of David E. Lehman of Lehman Mediation Service, LLC, 2520 Doehne Road, Harrisburg, PA 17110. Mr. Lehman's phone number is 717-238-1331 and his email address is dave@lehmanmediation.com.
2. The form of the proposed ADR session is mediation, with the costs to be shared evenly by the Parties (50% by the United States and 50% by Reily Street Associates).

3. The Parties plan to conduct the mediation on December 17, 18, or 20, 2019, following exchange of case-in-chief appraisal reports and any rebuttal reports. Mr. Lehman has confirmed that he is available to mediate the case on these days. In the event the date of the mediation needs to be changed, the Parties promptly will alert the Court.
4. Counsel for the United States and a representative of the General Services Administration will attend the mediation on behalf of the government. Counsel for Reily Street Associates and two of its principals, John Brinjac and David Brinjac, will attend the mediation on behalf of Reily Street Associates.

WHEREFORE, the Parties respectfully request that the Court approve the Parties' preferences regarding Alternative Dispute Resolution.

Respectfully submitted,

ON BEHALF OF THE UNITED STATES:

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/s/ Samuel S. Dalke

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**ON BEHALF OF DEFENDANT REILY
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/s/ Sean T. O'Neill

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