December 28, 2021

Dear Neighbors,

Following our last update letter on the Paine Six Ranges Condo project, we heard from several of you. Thanks for your feedback.

As we reported to you in the last update, we reached out to the City Planning Dep’t for information on what type of barrier would be required between CT units on Palisade and the parking lot on the southern boundary of the Six Ranges development. We received the **attached** email from Lynn Hyde, the city planner in charge of review of the Paine project, which we are providing for your information.

Since the question of what type of barrier will be required is not an issue that falls within the responsibilities of the Board to manage the CT property and protect our property from damage by others – and there is not yet any specific proposal from the Paine group to the City regarding what “screening” would be provided - the Board has not taken any position with either Paine or the City regarding this issue. When Paine submits a new proposal for review by the City, we will let you know, and the Board encourages all owners to submit any comments or objections directly to the City Planning Dept.

Meanwhile, as we reported to you in our last update, our attorney (Alanah Griffith) researched the basis for the threat of a lawsuit over the alleged “trespass” by Hanley and two stormwater pipes which cross the Paine property.

Based upon her research, Alanah advised the Board that CT Condominium has a “prescriptive easement” for these locations, because the “trespass” has been open and obvious for over 10 years; therefore, there is no basis for a lawsuit.

In our last update, we told you that we would be reaching out to you again, to reach a decision on how to respond to Mr. Paine’s threat of a lawsuit, after Alanah completed her research. However, based upon your feedback and Alanah’s advice, we decided it was not necessary to delay our response any further. We have directed Alanah to respond to the letter from Mr. Paine’s attorney, and inform him that we will not put their Hanley easement proposal to a vote, since there is no benefit to the CT community.

CT Condominium Board of Directors