



CRAMER & ANDERSON<sup>LLP</sup>  
Attorneys at Law

46 West Street  
P.O. Box 278  
Litchfield, CT 06759-0278

(860) 567-8717  
Fax (860) 567-4531

30 Main Street  
Danbury, CT 06810  
51 Main Street  
New Milford, CT 06776  
38C Grove Street  
Ridgefield, CT 06877

Perley H. Grimes, Jr., Esq.  
[pgrimes@cramer-anderson.com](mailto:pgrimes@cramer-anderson.com)

August 14, 2025

Via email: [landuse@salisburyct.us](mailto:landuse@salisburyct.us)

Dr. Michael Klemens, Chairman  
Salisbury Planning and Zoning  
Salisbury Town Hall  
27 Main Street  
PO Box 548  
Salisbury, CT 06068

Re: #2025-0287 / Wake Robin LLC & Ms. Serena Granbery (ARADEV LLC) /  
104 & 106 Sharon Road & 53 Wells Hill Road / Special Permit for Hotel,  
Redevelopment of the Wake Robin Inn (Section 213.5) / Map 47/ Lot 2 & 2-1 /

Dear Chairman Klemens:

As you know, I represent Angela and William Cruger of 86-88 Wells Hill Road, Lakeville, Connecticut regarding the above subject Application. I wrote you on August 12 stating that the time to hear and decide the Application could be extended to October 17, 2025. This morning I spoke with Attorney Andres and asked him if he agreed with that analysis. He stated to me that he thought that my analysis of the time to which the hearing and decision could be extended is "generally accurate."

He suggested that I write you to advise the names of the experts that my clients are going to ask to testify in this second hearing. The experts may include:

1. Bennett Brooks, Acoustical expert;
2. Brian Miller, Planning expert;
3. George Logan, Ecological expert;
4. Roger Rawlings, a property valuation expert.

The Crugers will also be filing an Intervention Petition pursuant to CGS §22a-19 so that they may have party status.



In addition, on August 5, 2025 a photometric plan was filed by Apex Lighting Solutions. An expert may be engaged to review the photometric plan and comment on lighting issues.

In the interest of fundamental fairness in the hearing process, on behalf of my clients, I hereby request that the hearing remain open until Tuesday, September 30, 2025. The Commission would then have seventeen (17) days, until October 17, 2025, to decide the Application. It would be helpful if the Commission could set a schedule going forward for the remaining hearings in August and September and permit the Crugers to present their experts at the start of one of the hearing dates so that those experts may rely on a date certain to testify.

An extension to September 30, 2025 would not be prejudice to the Applicant since a hearing on the 8-8(r) Appeal, which is pending, will not be held until November 12. As you know, this is a significant matter of grave concern to the over 400 people who have signed Petitions in opposition as well as to my clients. Therefore, we request the extension of the closing of the hearing to September 30 and that the Commission set the dates as soon as possible for the remaining hearings.

On August 5, the Chairman stated that the hearings would be on a "bunch of Tuesdays". I wrote Abby Conroy asking her for those dates, a copy of my letter to her is attached. I did not receive a response from her.

My clients, and likely the general public, are concerned that with new acoustical information being submitted as of August 5, testimony of acoustical experts occurring for the first time on August 12, and Attorney Mackey's response to questions being filed August 12<sup>th</sup> that they have sufficient time for preparation of rebuttal testimony to those issues and a reply to Attorney Mackey's August 12, 2025 letter.

If you have any questions concerning this request, please advise. Thank you for your cooperation and consideration of this request.

Very truly yours,

Perley H. Grimes, Jr.

PHG/lt

Enclosures

cc: Attorney Andres  
Attorney Mackey