
CAMPBELL ROCCO
L A W L L C

Edmund J. Campbell, Jr., Esquire
Direct Dial: (610) 992-5885
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July 21, 2026

VIA EMAIL AND HAND DELIVERY

Joel Rowe, Zoning Officer
Plymouth Township
700 Belvoir Road
Plymouth Meeting, PA 19462
jrowe@plymouthtownship.org

**RE: Petition for Substantive Validity Challenge
Data Center
900 Conshohocken Road**

Dear Joel,

As you will recall, this firm represents 900 Conshohocken Road LLC (the "Applicant"). On behalf of the Applicant please find:

1. 24 copies of a Petition for Substantive Validity Challenge;
2. 24 copies of an Addendum to Petition for Substantive Validity Challenge;
3. 24 copies of a schematic plan;
4. 24 copies of a redacted Agreement of Purchase and Sale; and
5. A check in the amount of \$1,000.00 for the filing fee.

Simultaneously, I am sending you a copy of this material electronically. If any additional material is required, please contact me directly. I look forward to working with you regarding this application.

Best regards,

/s/ Edmund J. Campbell, Jr.

Edmund J. Campbell, Jr., Esquire

EJC/mmb

CC: David Sander, Esquire
Alex Glassman, Esquire
Kevin Kyle

APPLICATION/APPEAL TO THE ZONING HEARING BOARD

PLYMOUTH TOWNSHIP
700 BELVOIR ROAD
PLYMOUTH MEETING, PA 19462

DATE: 7/21/2026

- (1) **Applicant/Appellant's Name and Address:** 900 Conshohocken LLC c/o Richard Heany
2201 Renaissance Blvd., Suite 410, King of Prussia, PA 19406 **PHONE NO.:** (610) 389-2696
- (2) **Owner's Name and Address:** ISG Plate Inc. c/o Cleveland-Cliffs Plate Inc., Attn : Legal Department
200 Public Square, Suite 3300, Cleveland, OH 4114-2315 **PHONE NO.:** (216) 695-5700
- (3) **Lessee's Name and Address:** N/A
(If Applicable)
- (4) **Location of Premises:** 900 Conshohocken Road
- (5) **Dimensions of Lot:** Approx. 66 acres
- (6) **Present Zoning Classification of Premises:** H-1
- (7) **The improvements thereon are:** Existing Cleveland Cliffs manufacturing facility

and the present use of the land and/or building is The existing facility is not being operated.

- Substantive Validity Challenge
- (8) **If this is an application for a ~~SPECIAL EXCEPTION~~ check here ☒ and state the specific sections of the PLYMOUTH TOWNSHIP ZONING ORDINANCE upon which the applicant relies:**

Substantive Validity Challenge. See attached addendum.

- (9) **If this is an appeal from a decision of the BUILDING INSPECTOR/ZONING OFFICER seeking a VARIANCE from the terms of the PLYMOUTH TOWNSHIP ZONING ORDINANCE check here ☐ and state the specific sections of the ORDINANCE as to which the VARIANCE is being sought:**

- Substantive Validity Challenge
- (10) **The (~~SPECIAL EXCEPTION~~) (~~VARIANCE~~) requested is as follows:** See attached addendum.

- (11) **Describe what is proposed of real estate in question:** 900 Conshohocken Road

- (12) **There must be attached hereto a plot plan, accurately drawn to scale, of the real estate in question, indicating the location and dimensions of the tract and improvements erected thereon as well as those proposed to be erected. ALL PLANS MUST BE FOLDED OR THE APPLICATION WILL NOT BE ACCEPTED.**

(OVER)

- (13) There must be paid herewith for a single-family dwelling and/or any structure appurtenant or accessory thereto a nonrefundable-filing fee of TWO HUNDRED DOLLARS (\$200.00) and for all other structures a nonrefundable filing fee of ONE THOUSAND DOLLARS (\$1,000.00). PLEASE MAKE CHECK PAYABLE TO "PLYMOUTH TOWNSHIP".

STATE OF PENNSYLVANIA:
SS
COUNTY OF MONTGOMERY:

Kevin Kyle, being duly sworn/affirmed according to law, deposes and says that he is the applicant above named and that the facts set forth in the foregoing application/appeal and all documents or exhibits submitted therewith, are true and correct to the best of his knowledge, information and belief.

APPLICANT/APELLANT

SWORN :
AFFIRMED AND SUBSCRIBED TO :
BEFORE ME THIS 21st DAY OF July :

Commonwealth of Pennsylvania - Notary Seal
MARY MARGARET BEVENCUR - Notary Public
Montgomery County
My Commission Expires December 8, 2027
Commission Number 1438603

Mary Margaret Bevencur

(OWNER'S SIGNATURE - IF APPLICABLE)

SPECIAL INSTRUCTIONS

FOR RESIDENTIAL APPLICATIONS - ORIGINAL, DIGITAL AND FIFTEEN (15) COPIES OF THE APPLICATION AND ALL SUPPORTING PAPERS, OR FOR COMMERCIAL, INDUSTRIAL, MULTI-FAMILY APPLICATIONS - ORIGINAL, DIGITAL AND TWENTY-FOUR (24) COPIES OF THE APPLICATION AND ALL SUPPORTING PAPERS SHALL BE FILED WITH THE ZONING OFFICER, ZONING OFFICE, PLYMOUTH TOWNSHIP, 700 BELVOIR ROAD, PLYMOUTH MEETING, PA 19462. ONLY THE ORIGINAL APPLICATION/APEAL NEED BE VERIFIED BY AFFIDAVIT.

IMPORTANT NOTICE

YOUR APPLICATION WILL BE SCHEDULED FOR A HEARING AT THE NEXT REGULARLY SCHEDULED MEETING OF THE PLYMOUTH TOWNSHIP ZONING HEARING BOARD. YOU MUST BE PREPARED TO PRESENT YOUR ENTIRE CASE AT THIS MEETING. ANY APPLICATION FOR CONTINUANCE OF THE HEARING MUST BE IN WRITING, AND YOU MUST GIVE THE REASONS FOR THE REQUEST. THE APPLICATION FOR CONTINUANCE MUST BE RECEIVED BY THE ZONING OFFICER NO LATER THAN 3:00 P.M. ON THE THURSDAY BEFORE THE ZONING HEARING. NO APPLICATIONS FOR CONTINUANCE WILL BE ACCEPTED AFTER THAT DEADLINE UNLESS THE APPLICANT APPEARS BEFORE THE ZONING HEARING BOARD TO APPLY FOR A CONTINUANCE. MORE THAN ONE REQUEST FOR A CONTINUANCE ON ANY APPLICATION MUST BE MADE IN PERSON, AND SUCH REQUESTS WILL NOT NORMALLY BE GRANTED UNLESS THERE ARE SPECIAL CIRCUMSTANCES.

DO NOT WRITE BELOW THIS LINE

CERTIFICATION OF ADVERTISEMENT

The above application/appeal was advertised in _____
On the following dates: _____ (Newspaper)

DATE POSTED ON PREMISES

ZONING OFFICER

**BEFORE THE BOARD OF ZONING HEARING BOARD OF PLYMOUHT
TOWNSHIP, MONTGOMERY COUNTY
PENNSYLVANIA**

In re Application of 900 River Road, LLC
for Substantive Validity Challenge

SUBSTANTIVE VALIDITY CHALLENGE¹

900 River Road, LLC (the “Applicant”) by and through its attorneys Campbell Rocco Law LLC, does hereby make a substantive validity challenge to the Plymouth Township (the “Township”) Zoning Ordinance (the “Zoning Ordinance”) pursuant to Section 909.1(a)(1) and 916.1(a)(1) of the Pennsylvania Municipalities Planning Code 53 P.S. 10101 *et seq.* (the “MPC”) and in support thereof states the following:

1. The Applicant is the equitable owner of certain real property located at 900 River Road, Plymouth Township (the “Property”) pursuant to a certain purchase and sale agreement dated January 7, 2026, by and between the Applicant and Cleveland Cliffs Plate LLC (the “PSA”). A redacted copy of the PSA is attached as Exhibit “A.”

2. The Applicant previously submitted an Application to the Township’s Zoning Hearing Board requesting a special exception to operate a data center at the Property. This Substantive Validity Challenge is filed in the alternative to that special exception application.

1. The Applicant previously submitted an Application to the Township’s Zoning Hearing Board requesting a special exception to operate a data center at the Property. This Substantive Validity Challenge is filed in the alternative to that special exception application.

3. The Property is located in the Township's HI Heavy Industrial zoning district.

4. The Township's Ordinance establishes various zoning districts and identifies permitted uses, accessory uses, conditional uses and special exception uses within those zoning districts.

5. The Ordinance does not define or otherwise recognize the following uses that are recognized as legitimate land uses under Pennsylvania law (collectively, the "Data Center Uses"):

- a. Data Center – a building or buildings which are occupied primarily by computers and/or telecommunications and related equipment, including supporting equipment, where electronic and digital information and data is handled, backed-up, processed, distributed, transferred and/or stored.
- b. Data Center Equipment – outdoor mechanical equipment adjacent to a data center that provides redundant power capacity to a data center, including but not limited to, battery storage facilities, backup generators (diesel or natural gas), and natural gas storage facilities
- c. Data Center Accessory Uses, Structures and Equipment – ancillary uses or structures associated with a data center including but not limited to: utilities; utility lines; administrative, logistical, fiber optic, grid connections, storage, and security buildings or structures; electrical substations; electric switching stations; fuel cells; primary, back-up and redundant power generators, facilities and equipment, fuel storage tanks and facilities; domestic and non-contact cooling water and waste-water

treatment facilities; water holding facilities; pump and/or compression/booster stations; water towers; environmental controls (heating, air conditioning or cooling towers, chillers, fire suppression, evaporators and related equipment); natural gas transmission, distribution, storage (including liquified natural gas storage) and compression; redundant data communications connections; and security features.

- d. Data Center Campus: A data center campus includes all of the structures and real estate owned, controlled, leased or otherwise occupied primarily for the use and purpose as Data Center(s), including: (i) Data Center(s); (ii) Data Center Accessory Uses; and (iii) all other systems, equipment, piping, conduit and other ancillary equipment, structures, and other appurtenances that are incidental to and/or needed for the construction, support, operation, repair, maintenance, and/or protection of the Data Center(s) and/or the data center campus.

6. The Ordinance does not expressly permit Data Center Uses in any zoning district.

7. Zoning ordinances that exclude uses are categorized as either *de jure* or *de facto* exclusionary. *MarkWest Liberty Midstream & Res., LLC v. Cecil Twp. Zoning Hearing Bd.*, 102 A.3d 549, 571 (Pa. Cmwlth. 2014).

THE ORDINANCE IS *DE JURE* EXCLUSIONARY

8. A zoning ordinance is presumptively valid but may not totally exclude a legitimate land use absent a substantial relationship to the public health, safety, and welfare.

9. Data Center Uses constitute a legitimate and lawful land use that serves substantial public and economic purposes, including digital communications, cloud computing, information storage, artificial intelligence, business operations, and internet infrastructure.

10. The Ordinance contains no use category that expressly permits Data Center Uses in any zoning district.

11. The complete absence of any zoning district in which Data Center Uses are expressly authorized results in the total exclusion of such uses from the Township.

12. Because the Ordinance does not provide any district where Data Center Uses are permitted by right, conditional use, or special exception, the Ordinance operates as a *de jure* exclusion of Data Center Uses

13. The Township cannot demonstrate that the complete exclusion of Data Center Uses bears a substantial relationship to the protection of public health, safety, or welfare.

14. Accordingly, the Ordinance is substantively invalid as an unconstitutional and unlawful exclusionary zoning ordinance.

ALTERNATIVELY, THE ORDINANCE IS *DE FACTO* EXCLUSIONARY

15. An ordinance is *de facto* exclusionary when an ordinance appears to permit a use, but under such conditions that the use cannot in fact be accomplished. *See, generally, Twp. of Exeter v. Zoning Hearing Board*, 599 Pa. 568 (2009).

16. A *de facto* exclusion of a legitimate use is established where an ordinance appears to permit the use but imposes unreasonable restrictions which, when applied, effectively prohibit the use throughout the municipality. *Borough of Edgewood v.*

Lamanti's Pizzeria, 124 Pa. Commw. 325, 556 A.2d 22, 24 (Pa. Cmwlth. 1989). See also, *Caln Nether Co., L.P. v. Bd of Supervisors of Thornbury Township*, 840 A.2d 484 (Pa. Commw. 2004).

17. In this case, the Township may contend that Section 1502.J. of the Ordinance permits Data Center Uses by special exception because Data Center Uses are “of the same general character of any permitted use.” See, Ordinance § 1502.J.

18. The existence of a “catch-all” provision or broad use category is not itself enough. Pennsylvania’s courts look to whether the use is genuinely accommodated. See generally, *Wimer Realty, LLC v. Twp. of Wilmington*, 206 A.3d 627, (2019 Pa. Comm).

19. The Ordinance requires applicants proposing unlisted uses to establish that the proposed use is substantially similar to an enumerated use and sets forth the burden off proof standards found in Section 2101.D. of the Ordinance.

20. Section 2101.D.(1)(a) of the Ordinance requires an applicant to demonstrate that the use falls within the provision of the Ordinance which accords the applicant the right to seek a special exception. As noted above, Section 1502.J. ostensibly satisfies this criterial.

21. However, the standards set forth in Section 2101.D.(1)(b) of the Ordinance sets requirements that a Data Center applicant can not meet, resulting in a *de facto* exclusion.

22. For example, Section 2101.D.(1)(b) provides that the Applicant has the burden of proof of establishing that the “allowance of the special exception will not be contrary to the public interest.”

23. In order to establish that the use will not be contrary to the public interest, the Applicant must establish 10 enumerated criteria set forth in § 2101.D.3. of the Ordinance, including but not limited to:

- a. Be consistent with the surrounding zoning and uses (§2201.D.3.(e)); and
- b. Adversely affect the comprehensive plan of the Township (§2201.D.3.(f)).

24. Because Data Center Uses are not permitted in any zoning district, they are facially not consistent with the uses in any surrounding zoning district and therefore making a data center inconsistent with the criteria found in §2201.D.3.(e).

25. The Township's comprehensive plan was adopted in 2019 and is entitled "Plymouth2040 Comprehensive Plan" (the "Comprehensive Plan").

26. The Comprehensive Plan recommends in general that the Property be rezoned to permit "Mixed Use Business & Employment" Uses. See, the Comprehensive Plan. Map 2, Future Land Use Plan.

27. In particular, Comprehensive Plan Recommendations RIV1 recommends that the Township "Draft zoning and subdivision and land development ordinance amendments to encourage the mixed use redevelopment of large, underutilized sites within the riverfront are, including the quarry, Derry Development, Plymouth Industrial Center, and steel plant sites. See, the Comprehensive Plan, RIV1 at page 141.

28. In addition, Comprehensive Plan Recommendation RIV2 recommends that the Township "[e]xplore opportunities to build a new SEPTA train station which could potentially be incorporated into a mixed use town center style development (see the illustrations on page 140-141)" See, the Comprehensive Plan, RIV2 at page 141.

29. Photographs and schematics contained in the Comprehensive Plan supporting RIV1 and RIV2 clearly identify the Property as the subject of the recommendations found in RIV1 and RIV2.

30. Because the Comprehensive Plan contemplates zoning changes at the Property which would eliminate the current heavy industrial uses and replace them with mixed use retail, commercial and residential and transit-oriented design uses, the Applicant's proposed Data Center Uses are necessarily in conflict with the Comprehensive Plan, making compliance with §(§2201.D.3.(f)) impossible.

31. By failing to identify Data Center Uses as a permitted use category and relegating such uses to a discretionary "similar use" process, the Ordinance creates uncertainty and imposes burdens not applicable to other comparable employment-generating and industrial uses.

32. As applied, the Ordinance leaves Data Center Uses without any reasonably certain zoning pathway for approval and subjects such uses to *ad hoc* determinations regarding similarity.

33. The practical effect of these provisions is to prevent the establishment of Data Center Uses anywhere within the Township.

34. An ordinance that, while facially permitting consideration of a use, provides no realistic opportunity for that use to locate within the municipality is *de facto* exclusionary.

35. Even if the Ordinance is not deemed *de jure* exclusionary, it is invalid because it has the practical effect of excluding Data Center Uses throughout the Township.

FAILURE TO ACCOMMODATE A LEGITIMATE LAND USE

36. Pennsylvania law requires municipalities to provide for all legitimate land uses somewhere within their boundaries and prohibits municipalities from using zoning regulations to exclude lawful uses absent sufficient justification.

37. Data Center Uses are a legitimate modern land use comparable in many respects to technology facilities, telecommunications facilities, research facilities, industrial operations, utility infrastructure, warehousing functions, and other employment-generating uses commonly accommodated through zoning regulations.

38. The Ordinance's failure to provide any zoning district where Data Center Uses are clearly permitted frustrates the Township's obligation to accommodate legitimate land uses.

39. The Applicant reserves the right to further modify, amend and/or supplement this Application.

40. The Applicant requests that the Zoning Hearing Board hold a hearing on its challenge and issue a decision as required by Section 916.1 of the MPC.

RELIEF REQUESTED

WHEREFORE, the Applicant respectfully requests that the Zoning Hearing Board:

1. Determine that the Ordinance is substantively invalid because it excludes Data Center Uses from the Township;
2. Determine that Data Center Uses constitute a legitimate land use entitled to reasonable accommodation within the Township;

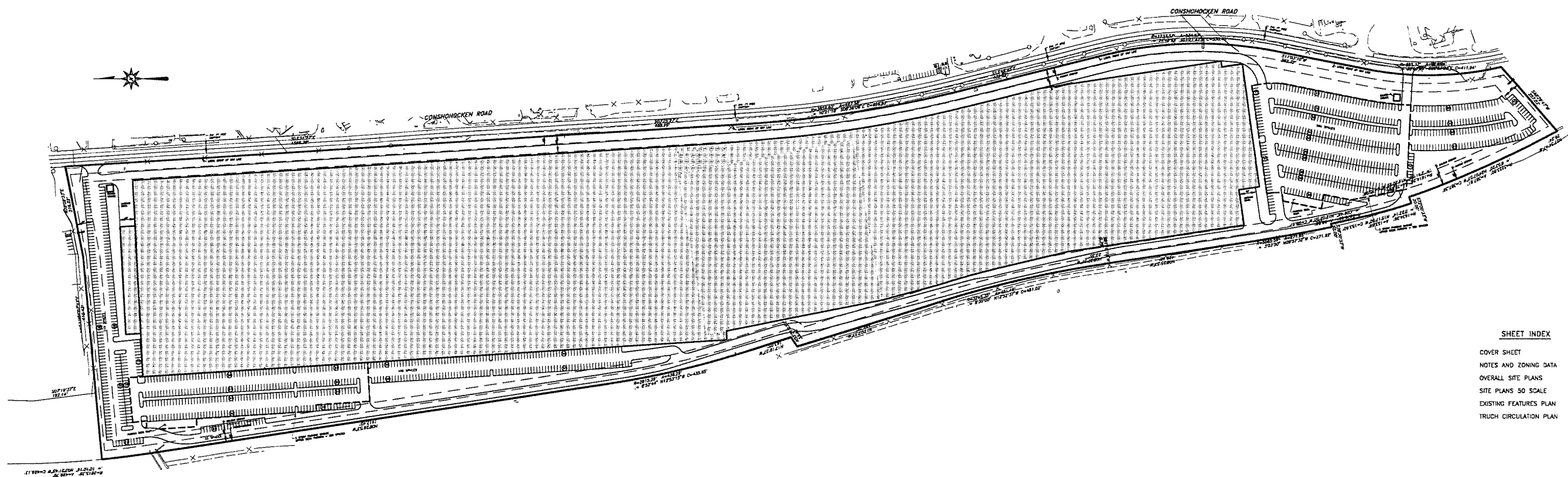
3. Approve site-specific relief to permit Data Center Uses on the Property consistent with the plan included with this Application.
4. In connection with the approval of site-specific relief to permit the Data Center Uses, the Applicant shall be entitled to any and all other zoning relief necessary to develop the Property for Data Center Uses including, without limitation, relief from maximum building height and building coverage limitations, relief from maximum parking ratios, relief from steep slope and natural resource protection standards, relief from the Townships maximum noise and sound standards including but not limited to an exemption from the maximum sound requirements during load reduction events, testing and emergency use of Data Center Equipment.
5. The Applicant reserves the right to further modify, amend and/or supplement this Application.
6. The Applicant requests that the Zoning Hearing Board hold a hearing on its challenge and issue a decision as required by Section 916.1 of the MPC.

Respectfully Submitted,

By: _____
Edmund J. Campbell, Jr., Esq.
Campbell Rocco Law, LLC
2201 Renaissance Boulevard
3rd Floor
King of Prussia PA 19406

900 CONSHOHOCKEN ROAD DATA CENTER/INFRASTRUCTURE CAMPUS

BY
900 CONSHOHOCKEN ROAD LLC
ZONING CODE VALIDITY CHALLENGE PLANS
PLYMOUTH TOWNSHIP, MONTGOMERY COUNTY, PENNSYLVANIA



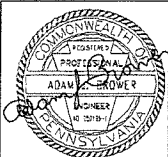
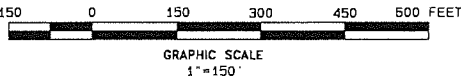
SHEET INDEX

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SITE PLANS 50 SCALE	5-8 OF 13
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SITE ENGINEER, SURVEYOR,
PLANNER

EDWARD B. WALSH & ASSOCIATES, INC.
WHITELAND BUSINESS PARK
855 SPRINGDALE DRIVE, SUITE 202
EXTON, PENNSYLVANIA 19341
PHONE: 610-903-0060
EMAIL: abrower@ebwalshinc.com

OWNER OF RECORD / APPLICANT
900 CONSHOHOCKEN ROAD, LLC
201 KING OF PRUSSIA ROAD
SUITE 501
RADNOR, PA 19087
(610) 239-5100
ATTN: KEVIN KYLE



LAND DEVELOPMENT PLAN FOR 900 CONSHOHOCKEN ROAD	
PLYMOUTH TOWNSHIP	MONTGOMERY COUNTY, PA.
Edward B. Walsh & Associates, Inc.	
CIVIL ENGINEERS & SURVEYORS	Project- 5182
Whiteland Business Park 855 Springdale Drive, Suite 202 Exton, Pennsylvania 19341 Phone: 610-903-0060 Fax: 610-903-0080	Date- 4-28-26
	Scale- 1"= 150'
	Drawn- SLM
	Checked- AJB
Plotted: 7/20/2026	File: F:\J\5182\FPS\5182-8.pro
Sheet- 1 OF 13	

ZONING REQUIREMENTS
ZONING DATA: HI - HEAVY INDUSTRIAL DISTRICT

	REQUIRED	PROPOSED
MINIMUM LOT AREA	2 ACRES	72.62 ACRES
MINIMUM LOT FRONTAGE	200 FT	4,497 FT
MIN. YARD SETBACKS:		
FRONT:	50 FT	50 FT
SD:	50 FT	50 FT
REAR:	50 FT	50 FT
MAX. BLDG HEIGHT	60 FT	60 FT
MAX. BLDG COVERAGE	33 1/3%	34.39%, 24,979 AC
MAX. IMPERVIOUS COVERAGE	85%	86.46%, 58,439 AC
MIN. GREEN SPACE	15%	45.77%
PARKING SETBACKS:		
FRONT YARD:	25 FT	25 FT
SD YARD:	10 FT	10 FT
REAR YARD:	25 FT	25 FT

PARKING TABULATION

PARKING REQUIREMENTS	
OFFICE USE	4.5 SPACES/1,000 SF GFA FIRST 50,000 SF 4 SPACES/1,000 SF GFA 2nd 50,000 SF 3.5 SPACES/1,000 SF GFA OVER 100,000 SF
SERVER/DATA AREA	1 SPACE/1,000
OFFICE AREA	50,000 SF TOTAL, 112,500 SF LEASABLE
REQUIRED PARKING	485 SPACES
SERVER/DATA AREA	(TOTAL AREA = 1,425,808 SF)
REQUIRED PARKING	1,426 SPACES
	TOTAL REQUIRED = 1,895 SPACES
	PARKING PROVIDED = 1,928 SPACES

BUILDING COVERAGES (FOOTPRINT)

EXISTING : 1,000,781 SF
PROPOSED: 1,086,082 SF

NOTE: PROPOSED BUILDING COVERAGE WILL NOT EXCEED THE EXISTING COVERAGE THAT IS PRESENT ON THE SITE CURRENTLY.

IMPERVIOUS COVER TABLE

EXISTING: 1,789,099 SF (41.07 AC)
PROPOSED: 2,545,597 SF (58.439 AC)

GENERAL NOTES

- OWNER/APPLICANT: 900 CONSHOHOCKEN ROAD, LLC
201 KING OF PRUSSIA ROAD
SUITE 501
RAOKOR, PA. 19387
(610) 239-8100
ATTN: EDNA KYLE
- SUBJECT PROPERTY IS LOCATED IN THE HI HEAVY INDUSTRIAL DISTRICT OF PLYMOUTH TOWNSHIP, MONTGOMERY COUNTY, PENNSYLVANIA.
- TOTAL SITE AREA IS 76,627 ACRES, WITHIN PLYMOUTH TOWNSHIP. SITE AREA DERIVED FROM FIELD SURVEY PERFORMED BY EDWARD B. WALSH & ASSOCIATES APRIL, 2026.
- IDROGRAPHIC AND EXISTING FEATURE INFORMATION OBTAINED FROM AERIAL SURVEY PERFORMED BY COOPER AERIAL SURVEYS, MARCH 2026. VERTICAL DATUM IS NAVD 83.
- SITE IS IDENTIFIED AS PARCEL ID NUMBER 49-00-02742-30-5.
- ALL EXISTING EASEMENTS AND MAINTENANCE AGREEMENTS SHALL REMAIN IN EFFECT.
- IT SHALL BE UNLAWFUL TO ALTER OR REMOVE ANY PERMANENT STORMWATER CONTROL AND BMP REQUIRED BY AN APPROVED STORMWATER CONTROL AND BMP OPERATIONS & MAINTENANCE PLAN OR TO ALLOW THE PROPERTY TO REMAIN IN A CONDITION WHICH DOES NOT CONFORM TO AN APPROVED STORMWATER CONTROL AND BMP OPERATIONS & MAINTENANCE PLAN.
- ALL PROPOSED UTILITIES SHALL BE INSTALLED UNDERGROUND.
- NO WALL, FENCE OR OTHER STRUCTURE SHALL BE ERECTED OR ALTERED AND NO HEDGE, TREE, SHRUB OR OTHER GROWTH SHALL BE MAINTAINED WHICH MAY CAUSE DANGER TO TRAFFIC ON A STREET BY OBSCURING THE VIEW.
- ALL CONSTRUCTION AND MATERIALS SHALL BE IN CONFORMANCE WITH PLYMOUTH TOWNSHIP, PENNSYLVANIA PUBLICATION 408, AND THE APPROPRIATE UTILITY COMPANIES WHENEVER REGULATION TAKES PRECEDENCE.
- EXISTING LOCATIONS SHOWN ON THE PLANS ARE APPROXIMATE, AND BASED ON SURFACE EVIDENCE AND PLANS PROVIDED BY THE CLIENT. TWT MAKES NO ASSURANCE AS TO THE COMPLETENESS OF, OR LOCATION OF ANY UNDERGROUND UTILITY. THE CONTRACTOR AND/OR OWNER SHALL BE RESPONSIBLE FOR LOCATING ALL EXISTING STRUCTURES AND UTILITIES, WHICH ARE DEEPLY NECESSARY, BOTH ABOVE AND BELOW THE GROUND SURFACE BEFORE HEAVY EQUIPMENT ENTERS THE CONSTRUCTION SITE.
- ALL BUILDINGS ARE REQUIRED TO BE SPRINKLERED IN ACCORDANCE WITH WEST CONSHOHOCKEN CODE 56-13.
- THE PROPOSED DEVELOPMENT USE WILL BE FOR DATA CENTERS.
- ALL BUILDINGS MAY INCLUDE THE FOLLOWING:
 - UPS
 - DATA HALLS
 - OFFICE
 - PRIMARY AND BACK-UP GENERATORS
 - OTHER ACCESSORY USES
- BEARING BASIS FOR THE SURVEY AS SHOWN ARE REFERENCED TO NAD 83, PA STATE PLANE COORDINATE SYSTEM, SOUTH ZONE AS DERIVED FROM GPS OBSERVATIONS.
- THE SOILS NOTED ON THE PLAN SET ARE TAKEN FROM THE USDA SOIL MAPPING SERVICE.
- THE PROPOSED DEVELOPMENT/USES WILL UTILIZE THE PUBLIC WATER AND SANITARY SEWER SYSTEM.
- THE STORMWATER MANAGEMENT AND CONVEYANCE FACILITIES PROPOSED FOR THIS PROJECT WILL BE OWNED AND MAINTAINED BY THE PROPERTY OWNER.
- A BLANKET EASEMENT ON THE PROPERTY SHALL BE GRANTED TO THE TOWNSHIP TO PROVIDE THE RIGHT BUT NOT OBLIGATION TO ENTER AND IMPROVE STORMWATER MANAGEMENT AND CONVEYANCE FACILITIES.
- ALL CONSTRUCTION AND MATERIALS SHALL BE IN CONFORMANCE WITH PENNDOT PUBLICATION 408.
- AS-BUILT PLANS OF STORMWATER BMPs ARE TO BE SUBMITTED TO THE TOWNSHIP.

RECORDED IN THE OFFICE FOR THE RECORDING OF DEEDS IN AND FOR THE COUNTY OF MONTGOMERY, AT NORRISTOWN, PA. IN PLAN BOOK _____, PAGE NO. _____ ON _____, 20____.

COUNTY RECORDER OF DEEDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF MONTGOMERY

ON THIS _____ DAY OF _____, 20____, BEFORE ME, THE SUBSCRIBER, A NOTARY PUBLIC FOR THE COMMONWEALTH OF PENNSYLVANIA, PERSONALLY APPEARED _____ OF _____ WHO ACKNOWLEDGED HIMSELF TO BE THE _____ OF _____ AND THAT AS SUCH BEING AUTHORIZED TO DO SO, EXECUTED THE FOREGOING PLAN THAT BY SIGNING THAT HE IS THE OWNER OF THE DESIGNATED LAND, AND THAT THIS PLAN TO BE THE OFFICIAL PLAN OF STREETS AND PROPERTY SHOWN THEREON, SITUATED IN THE TOWNSHIP OF PLYMOUTH, MONTGOMERY COUNTY, PENNSYLVANIA, AND DESIRE THAT THIS PLAN BE RECORDED ACCORDING TO LAW.

NOTARY PUBLIC

MY COMMISSION EXPIRES: _____

NOTARY SEAL

APPROVED BY THE PLYMOUTH TOWNSHIP COUNCIL ON THIS _____ DAY OF _____, 20____.

COUNCIL CHAIRMAN

TOWNSHIP SECRETARY

REVIEWED BY THE PLYMOUTH TOWNSHIP ENGINEER THIS _____ DAY OF _____, 20____.

SEAL

TOWNSHIP ENGINEER

REVIEWED BY THE PLYMOUTH TOWNSHIP PLANNING COMMISSION ON THIS _____ DAY OF _____, 20____.

PLANNING COMMISSION CHAIRMAN

ENGINEER/SURVEYOR'S CERTIFICATE, BOUNDARY & TOPOGRAPHY

THIS IS TO CERTIFY THAT THIS PLAN REPRESENTS A FIELD SURVEY PERFORMED UNDER MY SUPERVISION, THAT ALL MONUMENTATION SHOWN HEREON EXISTS, THAT ALL GEOMETRIC AND GEODETIC DETAILS AS SHOWN ARE CORRECT.

Adam J. Brower
P.E.

DATE

PE # - 052195E



MCPC No. _____

PROCESSED and REVIEWED. A report has been prepared by the Montgomery County Planning Commission in accordance with the Municipalities Planning Codes.

Certified this date _____

For The Director

MONTGOMERY COUNTY PLANNING COMMISSION

OVERALL SITE PLAN

**LAND DEVELOPMENT PLAN
FOR**

900 CONSHOHOCKEN ROAD

PLYMOUTH TOWNSHIP

MONTGOMERY COUNTY, PA.

Edward B. Walsh & Associates, Inc.
CIVIL ENGINEERS & SURVEYORS

Project - 5182

Date - 4-28-26

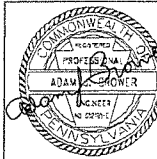
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Sheet - 2 OF 13

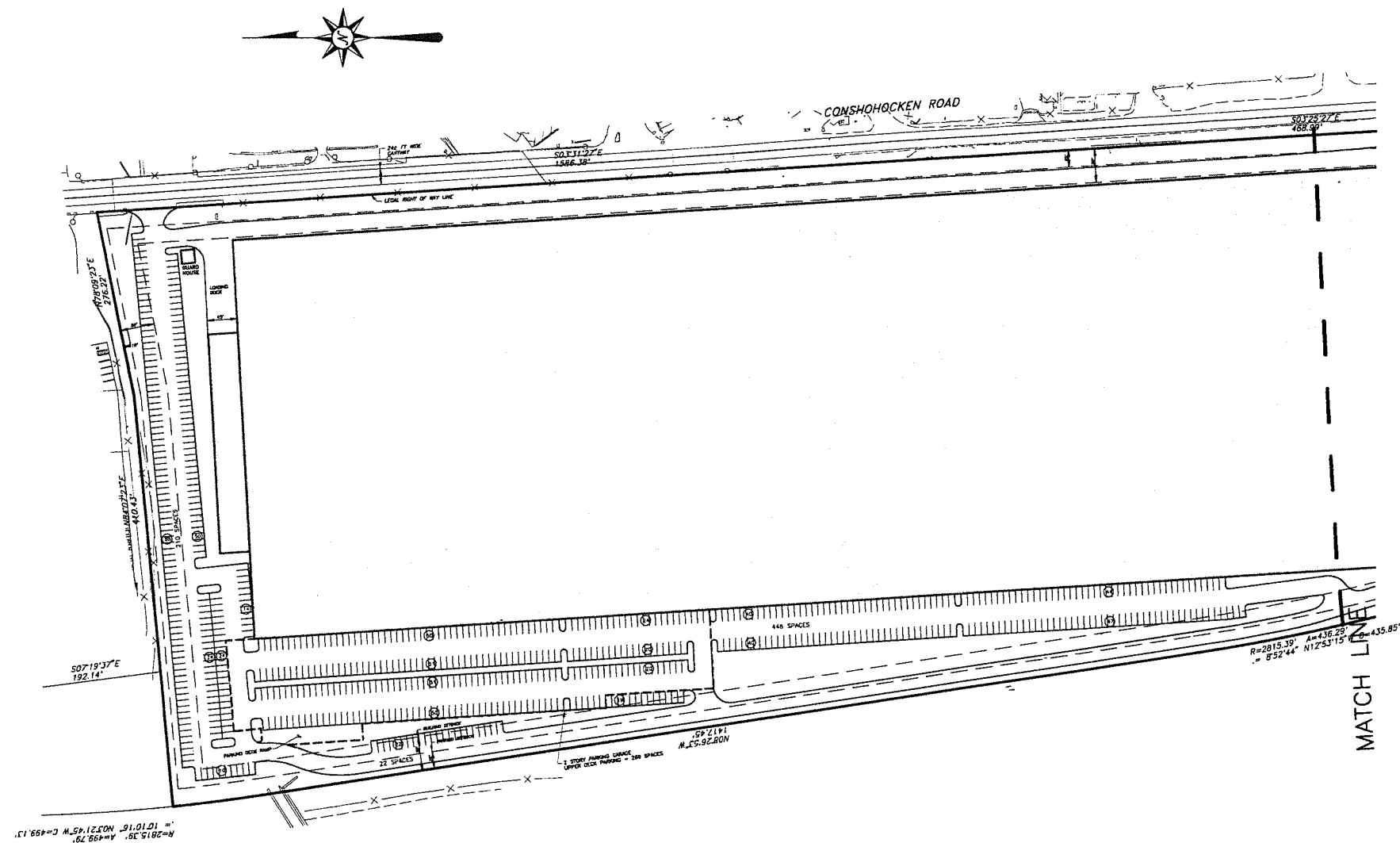
Whitelord Business Park
855 Springdale Drive, Suite 202
Eaton, Pennsylvania 19341
Phone: 610-903-0060
Fax: 610-903-0080



Plotted: 7/17/2026

File:

F:\JB\5182\FPS\5182-8.pro



ACT 287 PENNSYLVANIA ONE CALL NOTIFICATION

Preliminary Serial No. XXXX X/X/26
Final Serial No. date

UNDERGROUND UTILITY LINE PROTECTION (ACT 287, AS AMENDED)
E. B. Walsh & Associates, Inc. (EBWA) does not guarantee the accuracy of the locations for existing subsurface utility lines, structures, etc. shown on the plans. nor does EBWA guarantee that all subsurface utility lines, structures, etc. are shown.

Contractor shall verify the location and elevations of all subsurface utility lines, structures, etc. before the start of work, by calling the Pennsylvania One Call System at 1-800-242-1776.

If construction does not occur within 90 days of the above final one-call notification, the project owner is required to make notification to the Pennsylvania One Call System at 1-800-242-1776.

UTILITIES NOTIFIED

CROWN CASTLE	PECO EXELON CO
AT&T	ILLUMEN ILL 3
COMCAST PLUG	ABNNT
UPPER MERION TWP	TRANS CO GAS
UPPER MERION AUT	VERIZON EASTERN
AQUA PA DESIGN	

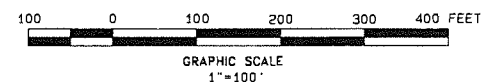


PID #490002742305

LEGEND

—	EXISTING TRACT BOUNDARY
—	EXISTING SIGN
—	EXISTING CURB
—	PROPOSED CURB
—	FUTURE RESERVE PARKING AREA
—	EXISTING EDGE OF PAVING
—	EXISTING SETBACK LINE
—	EXISTING GUIDE RAIL
—	EXISTING FENCE
—	EXISTING BUILDINGS
—	BUILDING AND DEVELOPABLE AREA

"BUILDING AND DEVELOPMENT AREA" MAY INCLUDE FACILITIES AND EQUIPMENT FOR THE STORAGE, MANAGEMENT, PROCESSING, TRANSMISSION OF DIGITAL DATA, OR BLOCKCHAIN, HOUSING COMPUTER AND NETWORK EQUIPMENT, SYSTEMS, SERVERS, SUBSTATIONS, APPLIANCES AND OTHER ASSOCIATED COMPONENTS RELATED TO DATA CENTERS, DIGITAL DATA OPERATIONS AND DATA WAREHOUSING INCLUDING UNINTERRUPTED POWER SUPPLY ("UPS") BATTERIES, OFFICE, AI REFERENCE, CHIP TRAINING, PRIMARY AND BACKUP GENERATORS AND POWER SOURCES. EACH BUILDING AND PROPERTY USE INCLUDES, DATA PROCESSING, DISTRIBUTION, MANUFACTURING, LOGISTICS, INFORMATION TECHNOLOGY, DATA HALLS, DATA WAREHOUSING, DATA MANAGEMENT & STORAGE, DATA CENTERS, CLOUD AND CLOUD SERVICES, ACCESSORY OFFICE, MECHANICAL, ELECTRICAL & PLUMBING INFRASTRUCTURE INCLUDING NATURAL GAS AND DIESEL ENGINES AND EQUIPMENT, AND ELECTRIC SWITCHGEAR, TRANSFORMERS, AND AFFILIATED LOADING, PARKING, TRUCK STORAGE, AND ANY OTHER CURRENTLY PRIMARY OR ACCESSORY USE INSIDE OR OUTSIDE ANY BUILDING IN SUPPORT OF A DATA CENTER.



OVERALL SITE PLAN

LAND DEVELOPMENT PLAN FOR

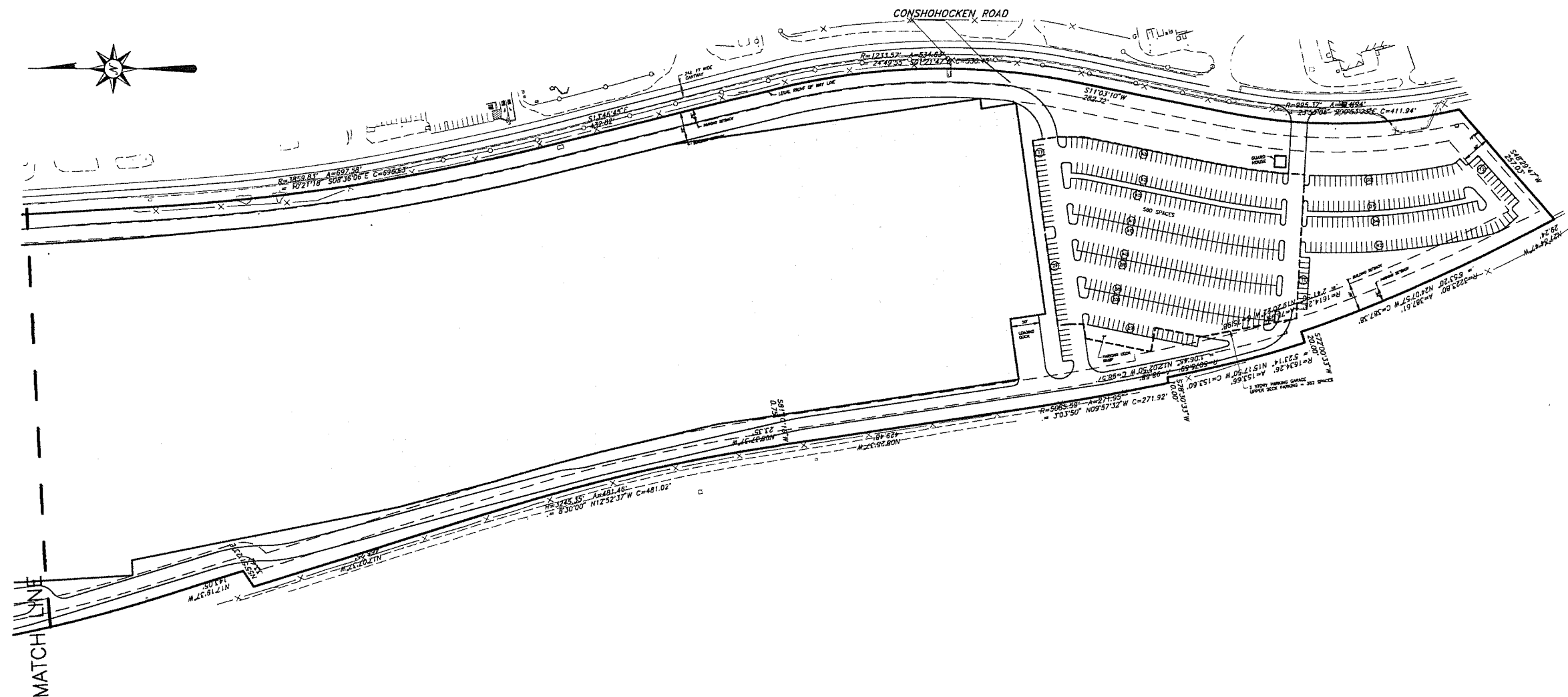
900 CONSHOHOCKEN ROAD

PLYMOUTH TOWNSHIP MONTGOMERY COUNTY, PA.
Edward B. Walsh & Associates, Inc.
CIVIL ENGINEERS & SURVEYORS
Whiteland Business Park
855 Springdale Drive, Suite 202
Exton, Pennsylvania 19341
Phone: 610-903-0060
Fax: 610-903-0080



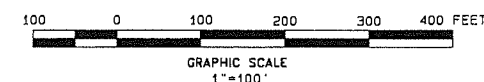
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Date-	4-28-26
Scale-	1"=100'
Drawn-	SLM
Checked-	AJB
Sheet-	3 OF 13

Plotted: 7/20/2026 File: F:\JB\5182\FPS\5182-8.pro



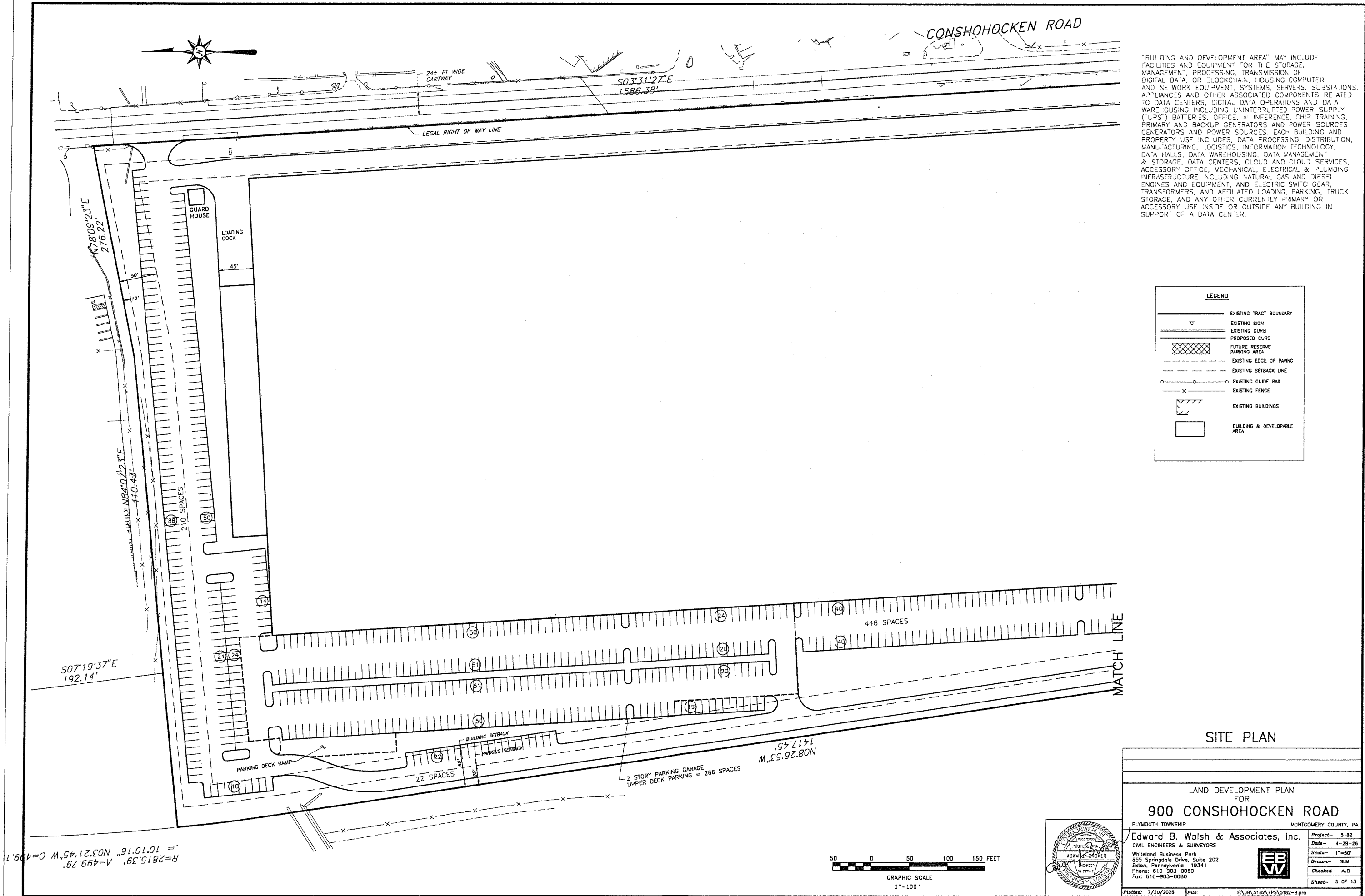
LEGEND	
	EXISTING TRACT BOUNDARY
	EXISTING SIGN
	EXISTING CURB
	PROPOSED CURB
	FUTURE RESERVE PARKING AREA
	EXISTING EDGE OF PAVING
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OVERALL SITE PLAN

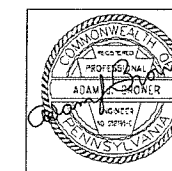
LAND DEVELOPMENT PLAN FOR 900 CONSHOHOCKEN ROAD	
PLYMOUTH TOWNSHIP	MONTGOMERY COUNTY, PA.
Edward B. Walsh & Associates, Inc.	
CIVIL ENGINEERS & SURVEYORS	Project- 5182
Whiteland Business Park 855 Springdale Drive, Suite 202 Exton, Pennsylvania 19341 Phone: 610-903-0060 Fax: 610-903-0080	Date- 4-28-26
	Scale- 1"=100'
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	Sheet- 4 OF 13
Plotted: 7/20/2026	File: F:\JB\5182\FPS\5182-B.pro



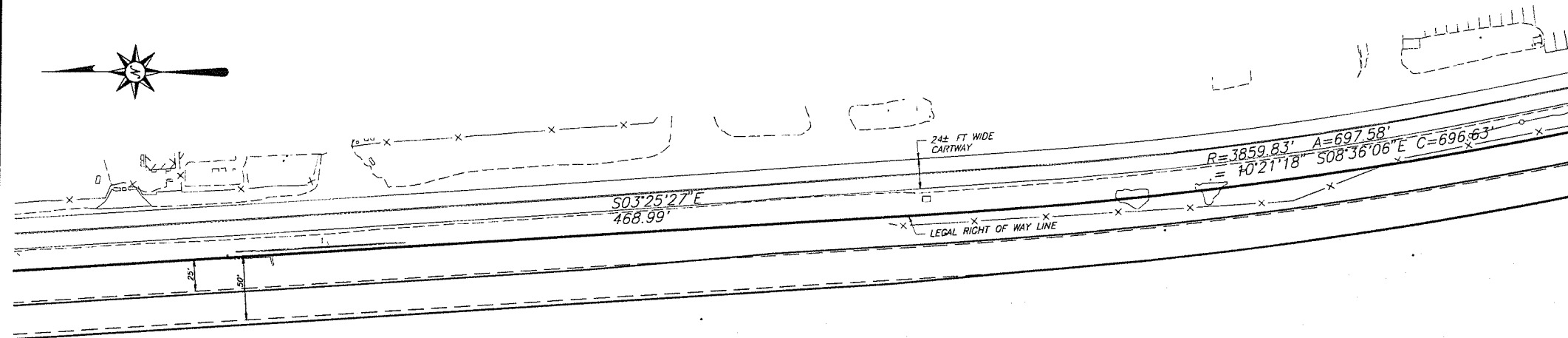
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SITE PLAN

LAND DEVELOPMENT PLAN FOR 900 CONSHOHOCKEN ROAD	
PLYMOUTH TOWNSHIP	MONTGOMERY COUNTY, PA.
Edward B. Walsh & Associates, Inc.	
CIVIL ENGINEERS & SURVEYORS	Project- 5182
Whiteland Business Park 855 Springdale Drive, Suite 202 Exton, Pennsylvania 19341 Phone: 610-903-0060 Fax: 610-903-0080	Date- 4-28-26
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Checked- AJB	Sheet- 5 OF 13

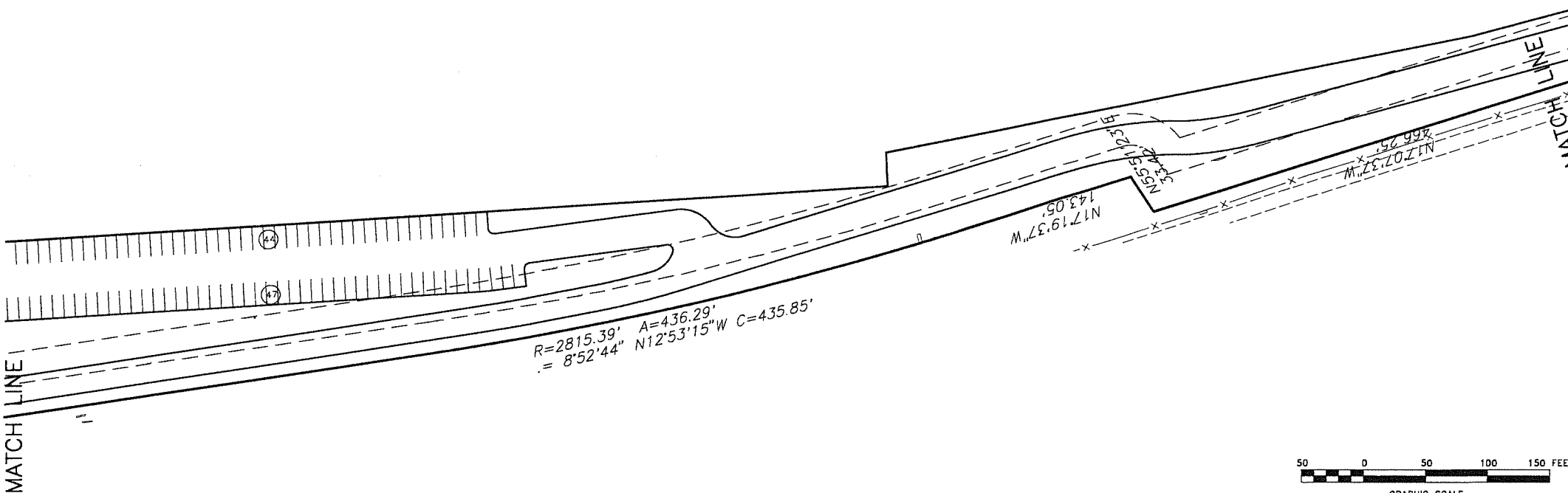


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LEGEND	
	EXISTING TRACT BOUNDARY
	EXISTING SIGN
	EXISTING CURB
	PROPOSED CURB
	FUTURE RESERVE PARKING AREA
	EXISTING EDGE OF PAVING
	EXISTING SETBACK LINE
	EXISTING GUIDE RAIL
	EXISTING FENCE
	EXISTING BUILDINGS
	BUILDING & DEVELOPABLE AREA



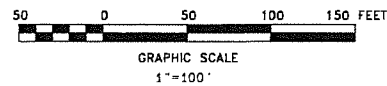
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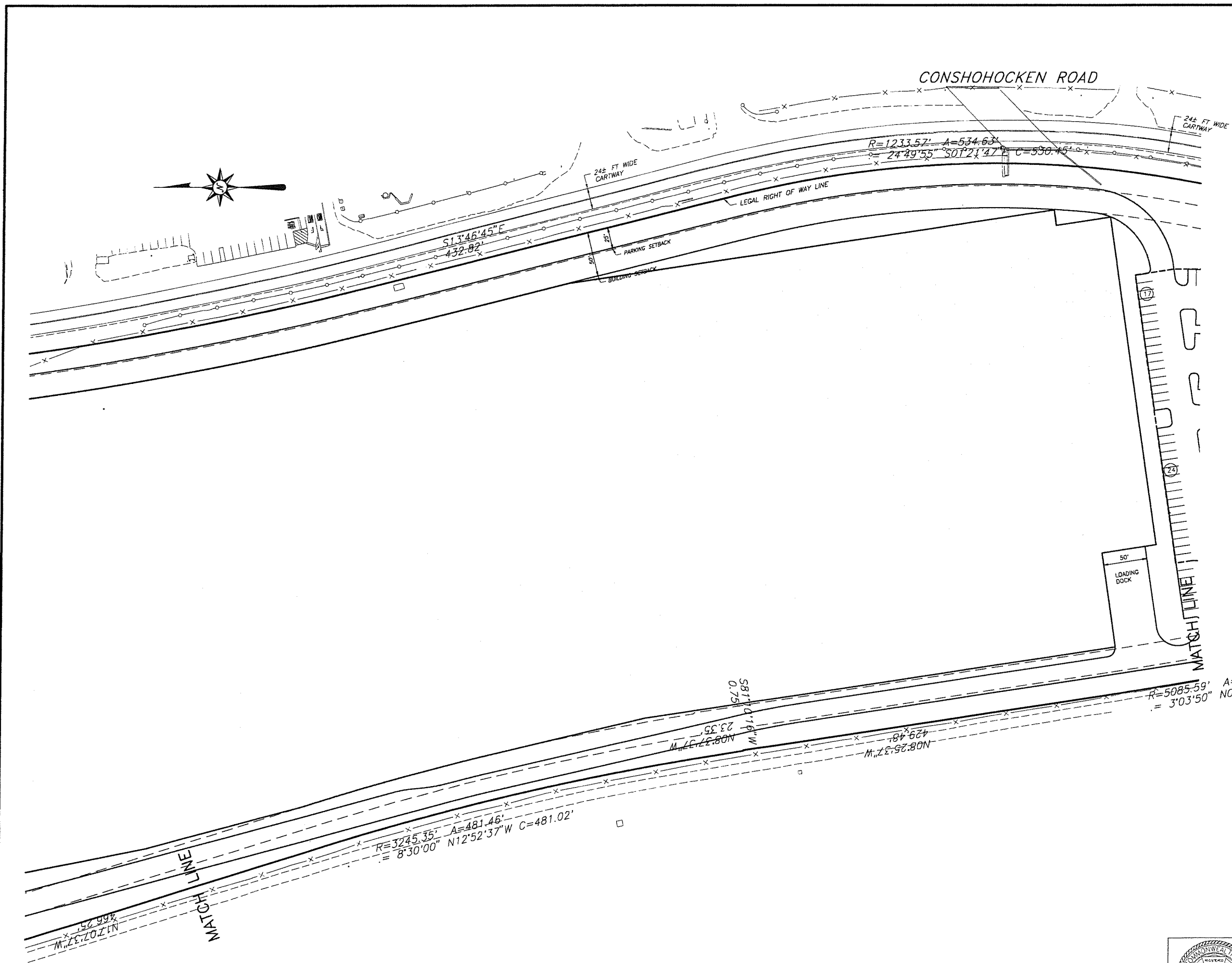
LAND DEVELOPMENT PLAN
FOR
900 CONSHOHOCKEN ROAD
PLYMOUTH TOWNSHIP
MONTGOMERY COUNTY, PA.

Edward B. Walsh & Associates, Inc.
CIVIL ENGINEERS & SURVEYORS
Whiteland Business Park
855 Springdale Drive, Suite 202
Exton, Pennsylvania 19341
Phone: 610-903-0060
Fax: 610-903-0080

Project- 5182
Date- 4-28-28
Scale- 1"=50'
Drawn- SJM
Checked- AJB
Sheet- 6 OF 13

Plotted: 7/20/2026 File: F:\JB\5182\FPS\5182-8.pro



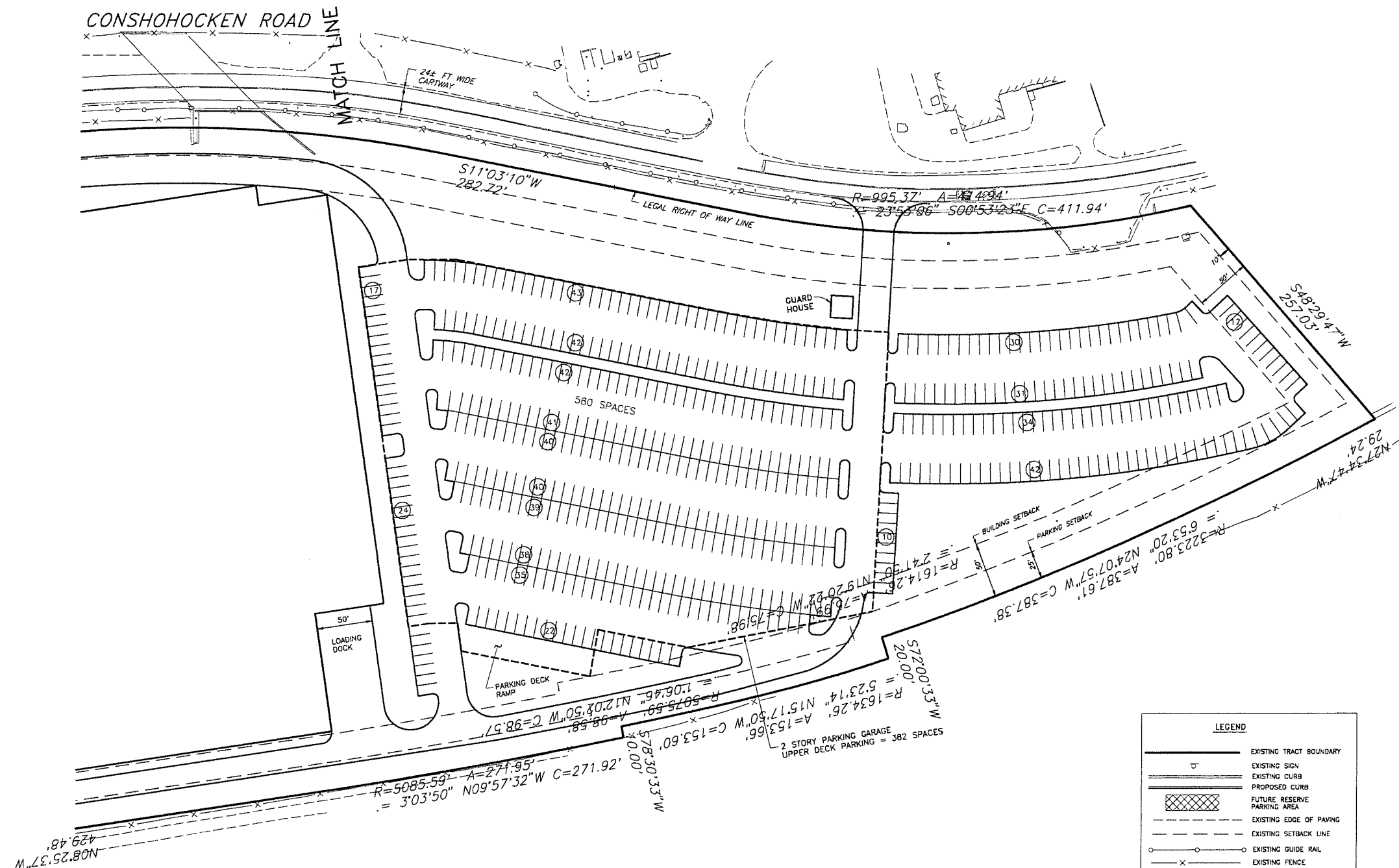


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	EXISTING TRACT BOUNDARY
	EXISTING SIGN
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	EXISTING SETBACK LINE
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	EXISTING FENCE
	EXISTING BUILDINGS
	BUILDING & DEVELOPABLE AREA

SITE PLAN

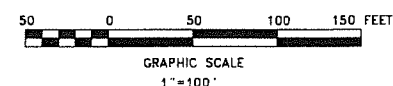
LAND DEVELOPMENT PLAN FOR	
900 CONSHOHOCKEN ROAD	
PLYMOUTH TOWNSHIP	MONTGOMERY COUNTY, PA.
Edward B. Walsh & Associates, Inc.	
CIVIL ENGINEERS & SURVEYORS	
Whiteford Business Park 855 Springdale Drive, Suite 202 Exton, Pennsylvania 19341 Phone: 610-903-0060 Fax: 610-903-0080	
Project- 5182 Date- 4-28-26 Scale- 1"=50' Drawn- SLM Checked- AJB Sheet- 7 OF 13	
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- EXISTING SIGN
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- PROPOSED CURB
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- EXISTING EDGE OF PAVING
- EXISTING SETBACK LINE
- EXISTING GUIDE RAIL
- EXISTING FENCE
- EXISTING BUILDINGS
- BUILDING & DEVELOPABLE AREA



SITE PLAN

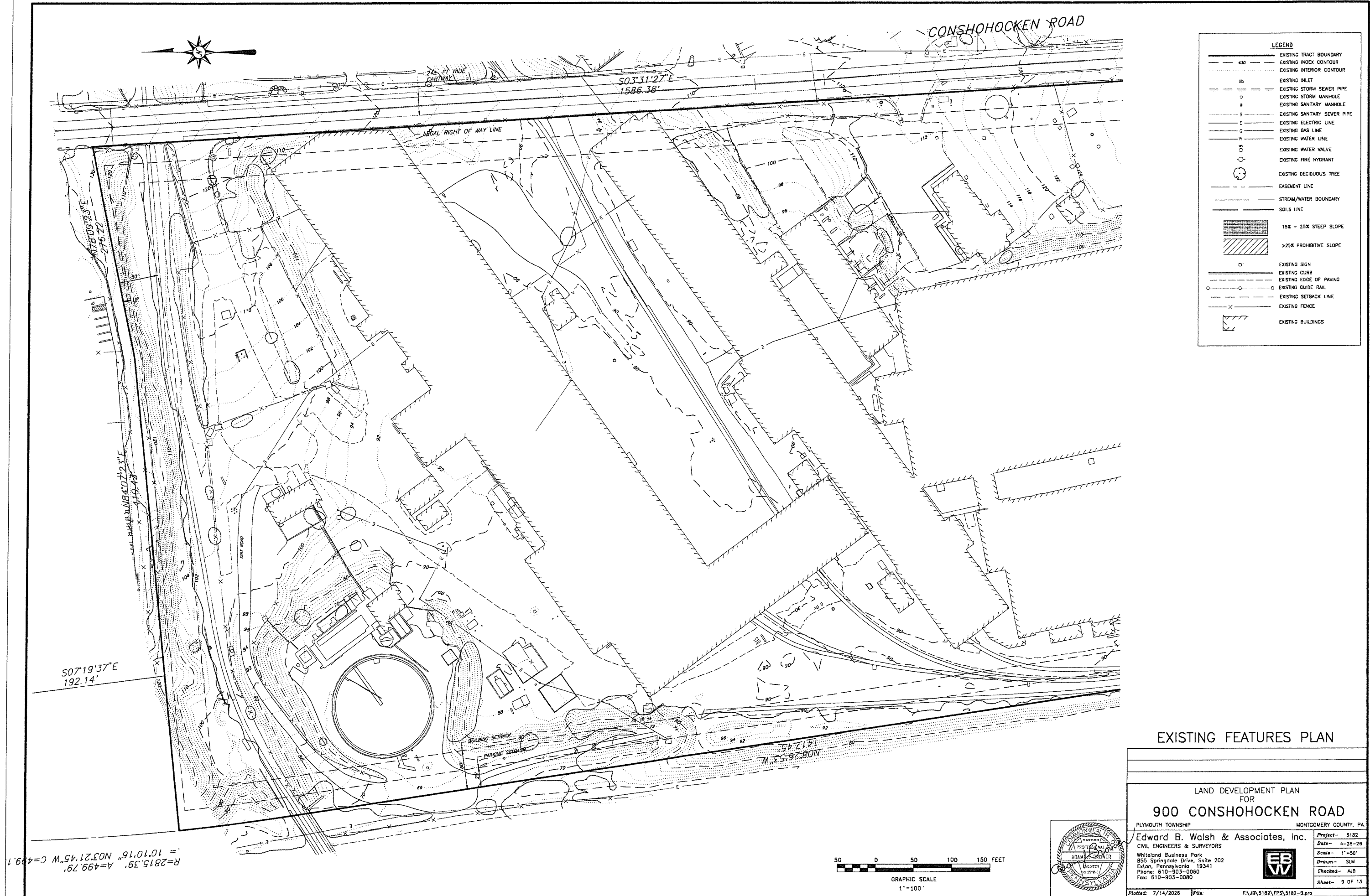
LAND DEVELOPMENT PLAN
FOR
900 CONSHOHOCKEN ROAD
PLYMOUTH TOWNSHIP MONTGOMERY COUNTY, PA.

Edward B. Walsh & Associates, Inc.
CIVIL ENGINEERS & SURVEYORS

Whitefield Business Park
855 Springdale Drive, Suite 202
Exton, Pennsylvania 19341
Phone: 610-903-0060
Fax: 610-903-0080

Project- 5182
Date- 4-28-26
Scale- 1"=50'
Drawn- SLM
Checked- AUB
Sheet- 8 OF 13

Plotted: 7/20/2026 File: F:\JIB\5182\FPS\5182-8.pr



LEGEND	
	EXISTING TRACT BOUNDARY
	EXISTING INDEX CONTOUR
	EXISTING INTERIOR CONTOUR
	EXISTING INLET
	EXISTING STORM SEWER PIPE
	EXISTING STORM MANHOLE
	EXISTING SANITARY SEWER PIPE
	EXISTING ELECTRIC LINE
	EXISTING GAS LINE
	EXISTING WATER LINE
	EXISTING WATER VALVE
	EXISTING FIRE HYDRANT
	EXISTING DECIDUOUS TREE
	EASEMENT LINE
	STREAM/WATER BOUNDARY
	SOILS LINE
	15% - 25% STEEP SLOPE
	>25% PROHIBITIVE SLOPE
	EXISTING SIGN
	EXISTING CURB
	EXISTING EDGE OF PAVING
	EXISTING GUIDE RAIL
	EXISTING SETBACK LINE
	EXISTING FENCE
	EXISTING BUILDINGS

EXISTING FEATURES PLAN

LAND DEVELOPMENT PLAN
FOR
900 CONSHOHOCKEN ROAD

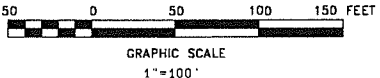
PLYMOUTH TOWNSHIP MONTGOMERY COUNTY, PA.
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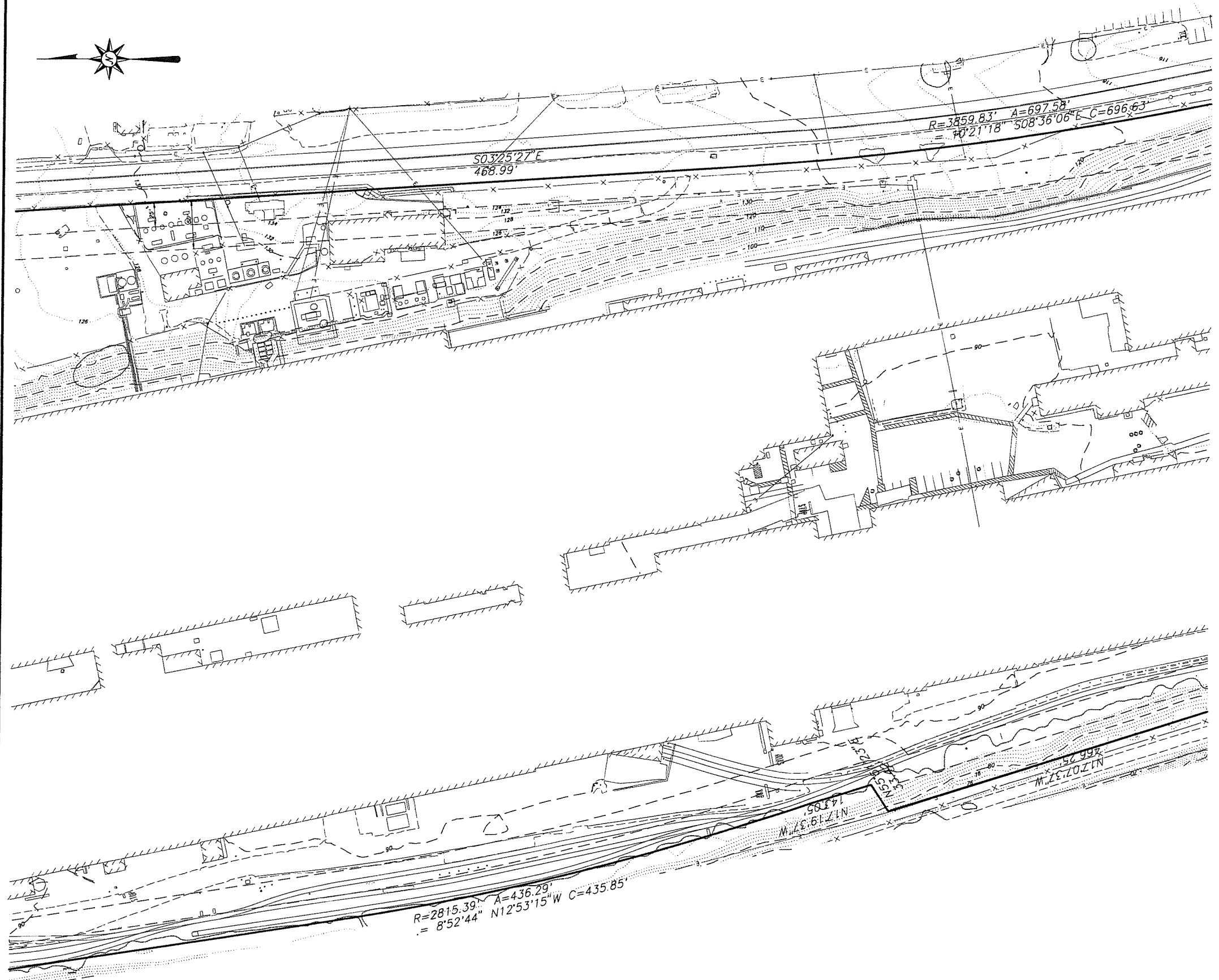


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Drawn- SLH
Checked- AIB
Sheet- 9 OF 13

Plotted: 7/14/2026 File: F:\JIB\5182\FPS\5182-8.pro

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= 10'10'16" N03'21'45" W C=499.1'





LEGEND	
	EXISTING TRACT BOUNDARY
	EXISTING INDEX CONTOUR
	EXISTING INTERIOR CONTOUR
	EXISTING INLET
	EXISTING STORM SEWER PIPE
	EXISTING STORM MANHOLE
	EXISTING SANITARY SEWER PIPE
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	EXISTING SETBACK LINE
	EXISTING FENCE
	EXISTING BUILDINGS

EXISTING FEATURES PLAN

LAND DEVELOPMENT PLAN
FOR
900 CONSHOHOCKEN ROAD

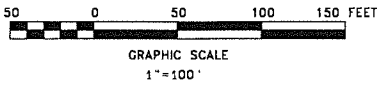
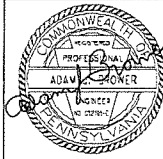
PLYMOUTH TOWNSHIP MONTGOMERY COUNTY, PA.

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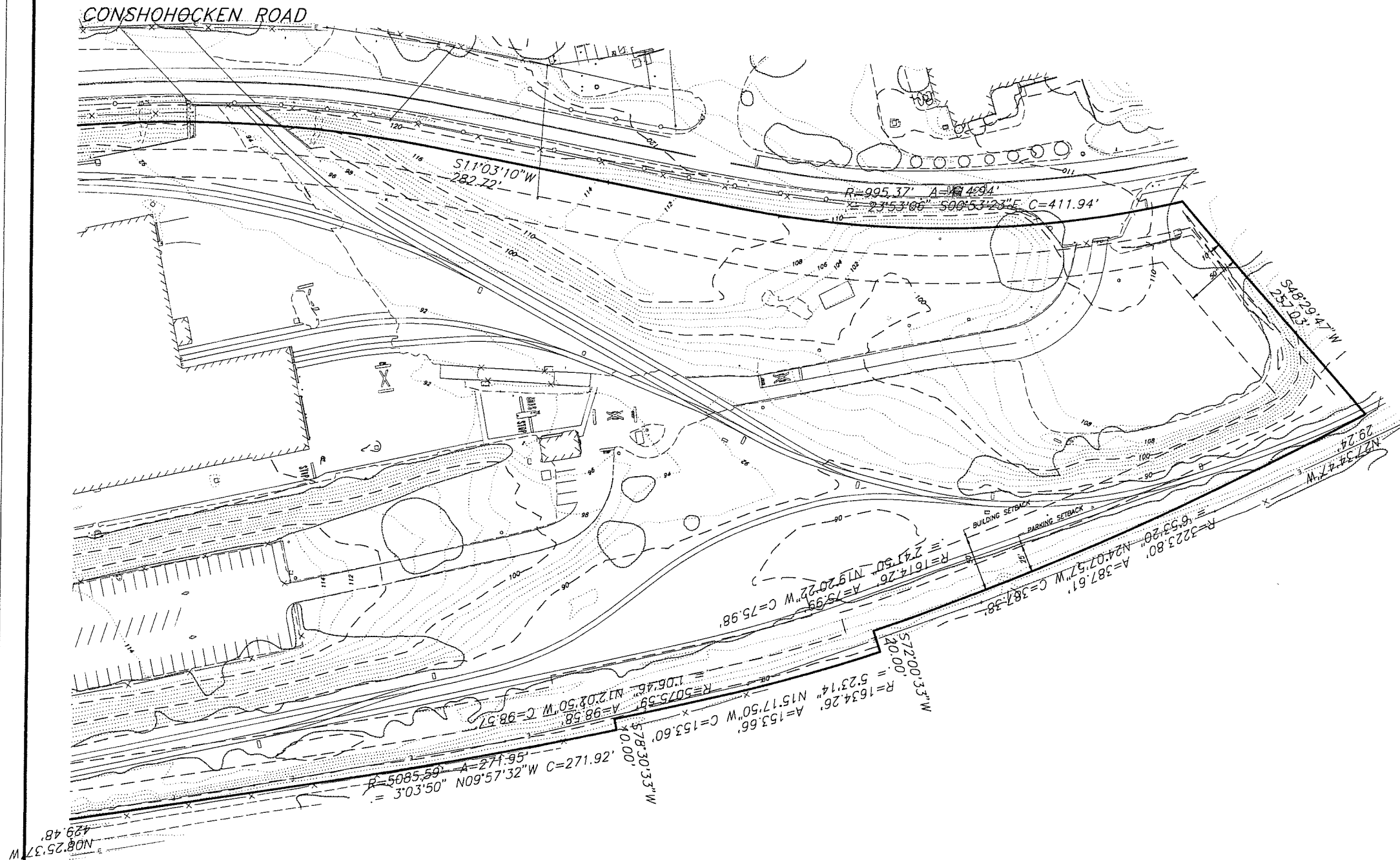


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Sheet-	10 OF 13





CONSHOHOCKEN ROAD



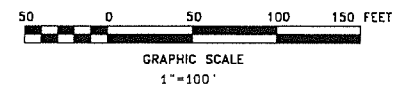
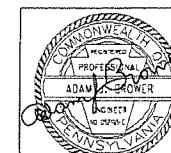
LEGEND	
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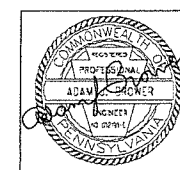
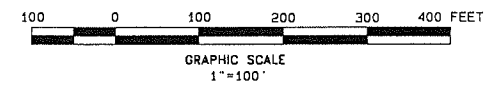
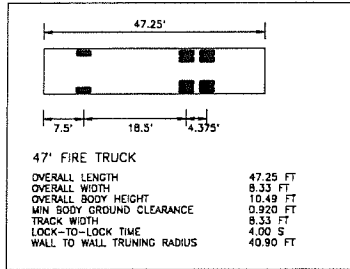
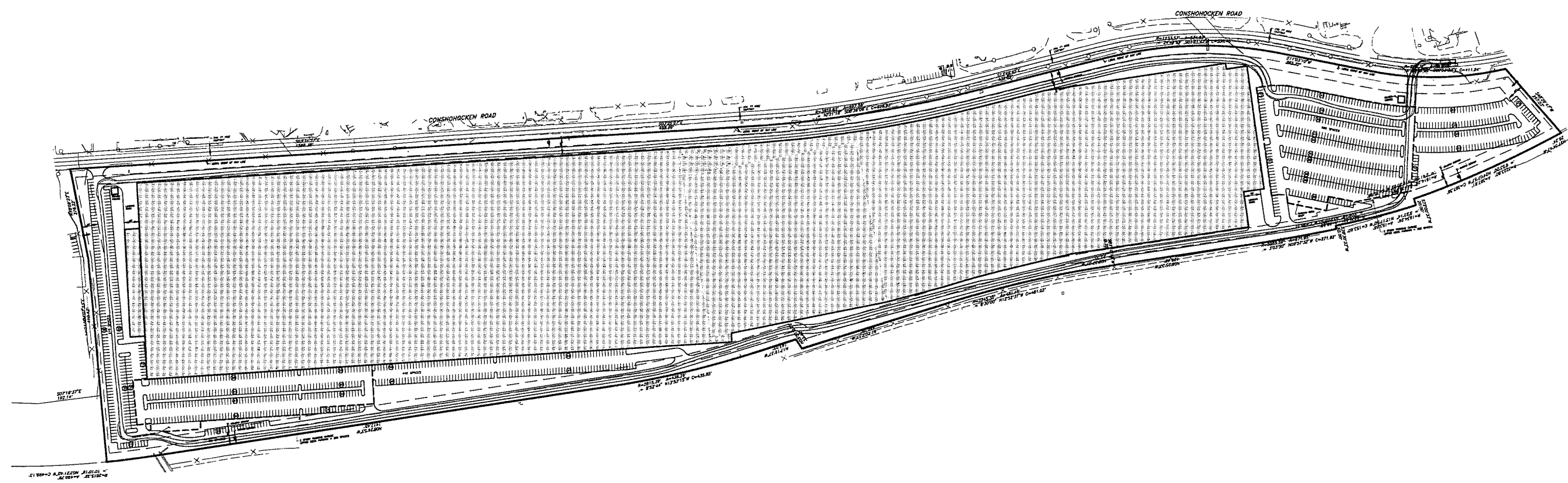
EXISTING FEATURES PLAN

LAND DEVELOPMENT PLAN
FOR
900 CONSHOHOCKEN ROAD

PLYMOUTH TOWNSHIP MONTGOMERY COUNTY, PA.
Edward B. Walsh & Associates, Inc.
CIVIL ENGINEERS & SURVEYORS
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Exton, Pennsylvania 19341
Phone: 610-903-0060
Fax: 610-903-0060

Project- 5182
Date- 4-28-25
Scale- 1"=50'
Drawn- SLW
Checked- AJB
Sheet- 12 OF 13





TRUCK CIRCULATION PLAN

LAND DEVELOPMENT PLAN
FOR
900 CONSHOHOCKEN ROAD

PLYMOUTH TOWNSHIP MONTGOMERY COUNTY, PA.

Edward B. Walsh & Associates, Inc.
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855 Springdale Drive, Suite 202
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Phone: 610-903-0060
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Project-	5182
Date-	4-28-28
Scale-	1"=100'
Drawn-	SM
Checked-	AJB
Sheet-	13 OF 13

Plotted: 7/20/2025 File: F:\JB\5182\FPS\5182-B.pro

AGREEMENT OF PURCHASE AND SALE

900 CONSHOHOCKEN ROAD

THIS AGREEMENT OF PURCHASE AND SALE ("Agreement"), dated this 7th day of January, 2026 (the "Effective Date") between CLEVELAND-CLIFFS PLATE LLC, a Delaware limited liability company, f/k/a ArcelorMittal Plate LLC, successor-in-interest to ISG Plate LLC, successor-in-interest to ISG Plate Inc. ("Seller"), whose address is 200 Public Square, Suite 3300, Cleveland, Ohio 44114, and 900 CONSHOHOCKEN, LLC, a Delaware limited liability company ("Buyer"), whose address is 2201 Renaissance Boulevard, Suite 410, King of Prussia, Pennsylvania 19406.

WITNESSETH:

In consideration of the mutual covenants and promises herein contained and other good and valuable consideration, the receipt and sufficiency of which hereby are acknowledged, the parties hereto agree as follows:

1. Agreement to Buy and Sell. Subject to the terms and conditions set forth in this Agreement, Seller hereby agrees to sell and convey to Buyer, and Buyer hereby agrees to purchase from Seller, all of Seller's right, title, estate and interest in and to that real property located in the County of Montgomery and Commonwealth of Pennsylvania, being more particularly described on Exhibit A, attached hereto and incorporated herein by reference, together with all of Seller's right, title and interest in and to any buildings, improvements, yard tracks, appurtenant rights, privileges and easements, including all right, title and interest of Seller in and to any land lying in the bed of any street, road or avenue, open or proposed, in front of or adjoining said real property, to the centerline thereof (collectively, the "Real Property"). In addition to the Real Property, Seller also desires to sell to Buyer, and Buyer also desires to purchase from Seller, certain items of personal property presently situated within or upon the Real Property, including equipment, as set forth on Schedule 1 to Exhibit E, attached hereto (the "Equipment," and collectively with the Real Property, the "Property"). In addition to the foregoing, Buyer or Buyer's affiliate and Seller's affiliate, Cleveland-Cliffs Railways Inc., shall enter into a secondary Agreement of Purchase and Sale with a concurrent closing date for the conveyance by Seller's affiliate of all such affiliate's right, title and interest in and to the Upper Merion & Plymouth short-line railway located at and/or upon the Real Property, including but not limited to the rail bridge and other rail-related assets, including any easement and/or other real property rights relating thereto (collectively the "Railroad Assets").



(b) At Closing, Buyer shall pay to Seller, in cash with current, federal funds wire transferred to an account designated by Seller in writing, an amount equal to the Purchase Price minus the sum of the Earnest Money and Extension Payment (defined herein), as applicable, which Seller shall receive at Closing from the Escrow Agent (subject to the prorations, charges and credits hereinafter set forth). Except as otherwise specifically set forth herein, the Purchase Price shall be net to Seller, with Buyer paying all costs and expenses with respect to the transactions contemplated hereby.

3. Evidence of Title.

(a) Buyer, at its sole cost and expense, shall promptly obtain (and deliver copies thereof to Seller) a Survey (as hereinafter defined) and a commitment ("Commitment") issued by National Executive Abstract LLC (the "Title Company") as agent for Fidelity National Title Insurance Company for the issuance of an owner's fee policy of title insurance, which Commitment shall show title vested in Seller free and clear of all liens and encumbrances except: (i) those created by or to be assumed by Buyer; (ii) those specifically set forth in this Agreement including, without limitation, the Industrial Land Use Restriction (as hereinafter defined); (iii) zoning ordinances; (iv) general and special real estate taxes and assessments that are a lien on the date of Closing, but are not yet due and payable; (v) legal highways; (vi) covenants, conditions, restrictions, agreements and easements of record that do not unreasonably interfere with the reasonable use of the Property; and (vii) those exceptions to title set forth on Exhibit B annexed hereto and incorporated herein by reference. As used herein "Survey" means a plat of survey of the Real Property in form and substance reasonably acceptable to Buyer prepared by a reputable surveyor or surveying firm, licensed by the state in which the Property is located.

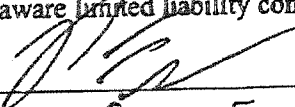
As used herein "Industrial Land Use Restriction" means the restriction set forth on Exhibit C annexed hereto and incorporated herein by reference which is to be set forth in the deed transferring title to the Property to Buyer and, among other things, shall prohibit Buyer and its successors and assigns from using the Property for any purpose other than as set forth on Exhibit C. The Industrial Land Use Restriction shall be a covenant running with the land in perpetuity, shall run for the benefit of and shall be enforceable by Seller and its successors and assigns as owners of real property proximate or adjacent to the Real Property and shall prohibit use of the Real Property or any part thereof for any purpose other than as set forth on Exhibit C.

(b) Buyer shall have until the earlier to occur of (i) fifteen (15) days following Buyer's receipt of the Commitment and the Survey or (ii) the expiration of the Inspection

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first set forth above.

SELLER:

CLEVELAND-CLIFFS PLATE LLC,
a Delaware limited liability company

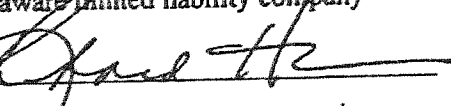
By: 

Print Name: Paul Finan

Title: EVP

BUYER:

900 CONSHOHOCKEN, LLC,
a Delaware limited liability company

By: 

Print Name: RICHARD HEANY

Title: PRESIDENT