

UL v. Oldbridge (6+7)

(1985)

Letter informing that Woodhaven Village
rejects the proposed form of order +
requests modifications

2 pgs

CA 000086L

*Law Offices**Hutt, Berkow & Jankowski*

A PROFESSIONAL CORPORATION

*Gordon Berkow
 Stewart M. Hutt
 Joseph J. Jankowski
 Janice H. Schorer
 D. Bruce Unger
 Ronald L. Shimancowicz
 Wayne J. Peck*

*Park Professional Bldg.**459 Amboy Avenue**P.O. Box 648**Woodbridge, N. J. 07095*

October 29, 1985

*Reply to
 P. O. Box 648*

*(201) 634-6400**Our File #*

Hon. Eugene D. Serpentelli, A.J.S.C.
 Ocean County Court House
 CN 2191
 Toms River, New Jersey 08754

FEDERAL EXPRESS

Re: Urban League vs. Township of Old Bridge
 Olympia and York vs. Township of Old Bridge
 Woodhaven Village vs. Township of Old Bridge

Dear Judge Serpentelli:

I am writing with regard to Mr. Hall's letter dated October 24, 1984 (sic) with which is enclosed the Proposed Form of Order for scheduling. Please be advised that Plaintiff, Woodhaven Village, Inc. objects to the Proposed Form of Order and respectfully requests the following modifications to same:

1. Inasmuch as the above captioned matters have been consolidated, the Woodhaven caption should be added to the first page of the Order;
2. Paragraph 2(a) should be amended to read as follows:
 - a. By October 31, 1985, counsel for the Township and counsel for O & Y Old Bridge Development Corp. and counsel for Woodhaven Village, Inc. will complete discussions as to language within the Settlement agreement and the attached appendices.
3. Paragraph 2(c) should be deleted in its entirety and the following paragraph, which parallels paragraph 2(b), should be inserted in place thereof:
 - c. By November 14, 1985, a final draft agreement embodying all appendices and resolving all outstanding matters affecting Woodhaven Village, Inc. will be prepared and submitted to the Township Council by Woodhaven Village, Inc.

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Page Two

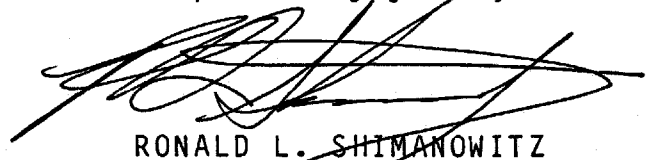
4. Paragraph 2(h) should be amended to read as follows:

h. On December 10, 1985, the Planning Board of the Township of Old Bridge shall hold a public hearing on "Plate A", which embodies the proposed development plan for O & Y Old Bridge and on "Plate B", which embodies the proposed development plan for Woodhaven Village, Inc. In the event that hearings on both Plate A and Plate B cannot be scheduled and/or concluded at the same time, then no decision shall be rendered by the Planning Board with regard to either the O & Y or Woodhaven Settlement Plans until such decisions can be rendered simultaneously.

Woodhaven requests the above modifications so that the subject Order more accurately reflects Woodhaven's participation in the Settlement Process.

Thanking you for your consideration of the above, I am

Respectfully yours,



RONALD L. SHIMANOWITZ
For the Firm

RLS:a1

cc: Eric Neisser, Esq.
John Payne, Esq.
Thomas Norman, Esq.
Thomas J. Hall, Esq.
Jerome Convery, Esq.
Dean Gaver, Esq.
Ms. Carla Lerman
Mr. Joel Schwartz