

U.L. v. Carteret, old bridge

15 May 1987

Letter from Barbara to Roy w/ copy of  
letter of Han attached

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15 Washington Street • Newark • New Jersey 07102-3192 • 201/648-5687

May 15, 1987

Mr. C. Roy Epps, President  
Civic League of Greater New Brunswick  
47-49 Throop Avenue  
New Brunswick, NJ 08901

Dear Roy:

Enclosed please find copy of letter dated  
May 12, 1987 of Thomas Jay Hall, Esq., which I  
believe is self-explanatory.

Please telephone me if you have any comments.

Sincerely,



encls

cc/Neisser, Payne (w/encls)

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May 12, 1987

FILE NO.

FEDERAL EXPRESS

Honorable Eugene D. Serpentelli, A.J.S.C.  
Superior Court of New Jersey  
Ocean County Court House  
Toms River, New Jersey

Re: O&Y Old Bridge Development Corp. - Old Bridge Township

Dear Judge Serpentelli:

I am in receipt of a letter dated May 7, 1987, from Jerome J. Convery, Township attorney of the Township of Old Bridge, in which he indicates that he would like to have the return date of the motion set down during the last week of June, 1987. I join in Mr. Convery's request for a Plenary Hearing on this matter, but respectfully request that the court set it down for a period prior to the 15th of June. I will be out of New Jersey from June 16th through June 23rd, and would not be able to participate in any litigation held during that interval.

This matter has been the subject of some considerable discussion among the parties, and there are now several expert reports which, I understand, have been prepared and are ready to submit to Carla Lerman for her review.

I respectfully submit this alternative schedule to the court, so that the parties may plan their schedules accordingly:

1. Clarification of Ms. Lerman's status

I have received copies of correspondence from both Tom Norman, the Planning Board attorney and from Jerome Convery, regarding Ms. Lerman's potential conflict of interest. I would propose that this matter be clarified, and that Ms. Lerman either be reconfirmed by this court as its master (which is O&Y's preference) or relieved of her responsibilities and a new master appointed.

Honorable Eugene D. Serpentelli, A.J.S.C.

May 12, 1987

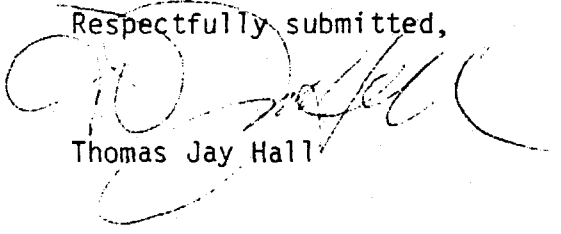
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2. Submission of expert reports

O&Y would request that the court advise the parties that they should provide all expert reports to Ms. Lerman no later than May 18th; and then Ms. Lerman be given until the end of May to review these reports and to provide all parties with a copy of her expert's report in this matter. The hearing could then be scheduled for the second week in June.

In view of the slippage of time which has taken place to this point, O&Y Old Bridge Development Corp. respectfully requests the court to assist the parties to set appropriate deadlines and move this case to a hearing, which we agree will be necessary to resolve the ultimate issues in this case.

Respectfully submitted,



Thomas Jay Hall

TJH/sls

cc: All parties on service list

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