Old Bridge 1961 letter to Juage: Plaintiffs Object to Convery 5 Common order of 9/30/87

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October 5, 1987

VIA LAWYERS SERVICE

The Honorable Eugene D. Serpentelli Assignment Judge, Superior Court Ocean County Court House CN 2191 Toms River, NJ 08754

RE: Urban League, et al. v. Carteret, et al. (Old Bridge)

Dear Judge Serpentelli:

Please be advised that the Civic League plaintiffs object to the form of Order submitted by Jerome Convery, Esq., by letter dated September 30, 1987.

It is my recollection that the Court did not, as Mr. Convery suggests, deny plaintiffs' crossmotion in its entirety. Since there were no papers submitted in opposition to that crossmotion and since Mr. Convery expressly conceded in earlier papers that the Township had failed to comply with the Judgment, it is respectfully submitted that it would have been very unusual for the Court to have done so.

Moreover, the Township is the only party urging such a drastic result since Thomas Norman, Esq., attorney for defendant Planning Board, has consented to the Civic League plaintiffs' form of Order. It is respectfully submitted, accordingly, that that form of Order should be signed by this Court.

Respectfully yours,

Sombra &

cc/Old Bridge Service List

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