

Old Bridge (1987)  
Copies of explanatory letters  
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School of Law-Newark • Constitutional Litigation Clinic  
S.I. Newhouse Center For Law and Justice  
15 Washington Street • Newark • New Jersey 07102-3192 • 201/648-5687

November 19, 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 copies of self-explanatory  
letters dated November 13 and 18, 1987 from  
Judge Serpentelli and Stewart Hutt, respectively.

Sincerely,



encls

cc/John, Eric (w/encls)  
Mount Laurel Team

# Superior Court of New Jersey

CHAMBERS OF  
JUDGE EUGENE D. SERPENTELLI  
ASSIGNMENT JUDGE



OCEAN COUNTY COURT HOUSE  
C.N. 2191  
TOMS RIVER, N.J. 08754

November 13, 1987

Thomas Jay Hall, Esquire  
Brener, Wallack & Hill  
210 Carnegie Center  
Princeton, New Jersey 08543-5226

Stewart M. Hutt, Esquire  
Hutt, Berkow & Jankowski  
Park Professional Building  
459 Amboy Avenue  
P. O. Box 648  
Woodbridge, New Jersey 07095

Re: Urban League of Greater New  
Brunswick et al. v. Township  
of Old Bridge et al.  
Docket No. L-009837-84-PW

Dear Counsel:

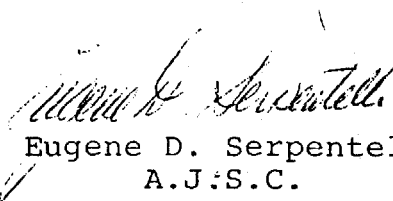
I continue to hold two (2) Motions filed by Messrs. Hall and Hutt for Reconsideration with regard to the Old Bridge decision. Pursuant to the request of counsel, I have withheld assigning a date to those Motions so that counsel may confer. Frankly, I see no basis for the Motions in the first instance and it is my intention to mark them withdrawn unless, by letter response, either Mr. Hall or Mr. Hutt or both can provide some preliminary argument as to why

(Continued)  
Messrs. Thomas Jay Hall  
and Stewart M. Hutt

November 13, 1987

the court should reconsider.

Very truly yours,

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

EDS:toc

cc: Thomas Norman, Esquire,  
Norman & Kingsbury  
Frederick C. Mezey, Esquire,  
Mezey & Mezey  
Dean Gaver, Esquire,  
Hannoch Weisman  
Barbara Stark, Esquire,  
Rutgers School of Law  
Jerome J. Convery, Esquire  
William Flynn, Esquire,  
Antonio & Flynn  
George Raymond,  
Court-appointed Master

*Law Offices*  
*Hutt, Berkow & Jankowski*

A PROFESSIONAL CORPORATION

FAX: 201-634-0718

Our File #

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November 18, 1987

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

Re: Urban League of Greater New  
Brunswick et al. vs. Township  
of Old Bridge, et al.  
Docket No. L-009837-84-PW

Dear Judge Serpentelli:

I am writing with regard to your letter to myself and Mr. Hall dated November 13, 1987, in which you advise that it is the Court's intention to mark the plaintiff's Motions for Reconsideration as withdrawn unless some preliminary argument is set forth by letter response. As per our recent telephone conversation, the delay in filing of our brief is due in part to the delay in receiving the transcript and as a result of my partner's recent illness and hospitalization. At this time, Woodhaven's Brief in Support of Motion for Reconsideration is ninety percent complete and Woodhaven shall file same by Wednesday, November 25, 1987. Said Brief sets forth Woodhaven's complete argument as to matters overlooked by the Court which we feel are a substantial basis for reconsideration of the Court's ruling. In short, our argument for reconsideration is that Woodhaven is a completely independent project and is entitled to the benefit of its bargain; therefore, the judgment should not be set aside as to Woodhaven. The Brief to be submitted will expound on this and related arguments.

Accordingly, we respectfully request the Court to not withdraw the subject motions and, upon receipt of plaintiff's brief, to set down a briefing schedule for defendants as well as a date for oral argument.

*Hutt, Berkow & Jankowski*

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

November 18, 1987

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Thanking you for your consideration of the above, I remain,

Respectfully yours,

  
STEWART M. HUTT  
FOR THE FIRM

SMH:al

cc: Thomas Jay Hall, Esq.  
Thomas Norman, Esq.  
Frederick C. Mezey, Esq.  
Dean Gaver, Esq.  
Barbara Stark, Esq.  
Jerome J. Convery, Esq.  
William Flynn, Esq.  
George Raymond, Esq.  
Mr. Joel Schwartz