

U.L. v. Cateret, Cranbury

12/1

1983

- memo to UL team re review of Mallach report
- Letter to Judge re Cranbury's position concerning appropriate region for fair share allocation purposes
- Letter from Judge to Old Bridge + North Brunswick Attorneys reassuring them their matters had not been reactivated

pgs. 3

no p.i.

they were stapled together so I left them together, not sure how they are interrelated though

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From the desk of ...

Eric Neisser

Wed noon

URBAN LEAGUE TEAM

We today (wed) received four copies of the Mallach report filed with the court. I know it will be hard (impossible?) for you all to review ~~of~~ all of this 91 page (!!) masterpiece by Thursday's team meeting-- but I would ask all of you to make a sincere (remember the good faith defense) effort to read at least pages 1-35 which is his general plan and his critique of the Lerman report. ~~in~~ Pages 26-~~33~~ 35 are particularly important in our formulating questions to Lerman which is the main work of our team meeting.

THANKS ERIC

*Eric*

Copies in file cabinet -  
Please get back as soon as you're done

Rutgers Constitutional Litigation Clinic

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J. SCHUYLER HUFF  
WILLIAM C. MORAN, JR.  
MICHAEL P. BALINT  
                      
LAWRENCE A. LAYMAN

December 1, 1983

Honorable Eugene D. Serpentelli  
Ocean County Court House  
CN 2191  
Toms River, New Jersey 08753

RE: URBAN LEAGUE OF GREATER NEW BRUNSWICK vs.  
TOWNSHIP OF CRANBURY, et al  
Docket No. C-4122-73

Dear Judge Serpentelli:

I am writing to express the position of Cranbury Township concerning the appropriate region for Cranbury for fair share allocation purposes.

It is the Township's position that the appropriate region is the Primary Metropolitan Statistical Area developed by the Department of the Census. This area consists of Middlesex, Somerset, Mercer and Hunterdon Counties. This roughly approximates the journey to work region from Cranbury Township and provides a convenient statistical base from which to generate housing information. Its primary advantage is its workability in satisfying the determination of region in Mount Laurel II without the necessity of developing mountains of statistical data for this purpose.

The position of some of the plaintiffs seems to be that Cranbury has been remiss for not undertaking their own independent study of region and developing its own fair share allocation plan. The practical impact of such a study in Cranbury is much more severe than on other municipalities with substantially larger populations. It seems unfair and inefficient to require every municipality, regardless of size, to undertake such extensive studies.

Respectfully yours,

  
WILLIAM C. MORAN, JR.

WCM:lmt  
cc: all counsel



# Superior Court of New Jersey

CHAMBERS OF  
JUDGE EUGENE D. SERPENTELLI

OCEAN COUNTY COURT HOUSE  
C. N. 2191  
TOMS RIVER, N. J. 08753

December 6, 1983

Richard Plechner, Esq.  
1 Old Bridge Plaza  
Old Bridge, N. J. 08857

Leslie Lefkowitz, Esq.  
P. O. Box 3049  
North Brunswick, N. J. 08902

Re: Urban League of New Brunswick v. Carteret  
Docket No. C-4122-73 Middlesex County

Gentlemen:

I have received a copy of Mr. Neisser's letters of November 29 to both of you as well as a copy of his letter of December 2 sending you a copy of our most recent case management letter. It should be clear to you that Mr. Neisser has undertaken this correspondence without contacting the Court. You should not assume that your municipalities will be involved in either the case management conference of January 24, 1984, the scheduled pretrial or trial date. As far as the Court is concerned, your matters have not been reactivated and certainly not consolidated at this posture.

Very truly yours,

*Eugene D. Serpentelli*

Eugene D. Serpentelli, J.S.C.

EDS:RDH

cc: Eric Neisser, Esq. ✓