

UL. v. Cateret, Cranbury

12/5

1984

letter confirming Phone call re request for 2 week extension
of dead line for compliance plan

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HUFF, MORAN & BALINT

COUNSELLORS AT LAW

CRANBURY-SOUTH RIVER ROAD

CRANBURY, NEW JERSEY 08512

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

TELEPHONE
(609) 655-3600

December 5, 1984

Honorable Eugene D. Serpentelli
Superior Court of New Jersey
Court House
Toms River, N.J. 08754

Dear Judge Serpentelli:

This will confirm my telephone conversation today with your law clerk, Russ, wherein I requested a two week extension of time from the December 7th deadline for Cranbury Township to submit its plan for compliance with your order of July 27, 1984.

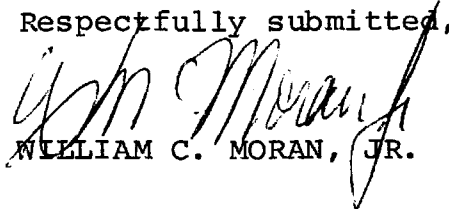
The Township Committee and Planning Board have been meeting frequently and diligently in order to meet the December 7th deadline; however, the volume of work has been overwhelming. In addition to the proposals of the various builders/plaintiffs, the Township has also received proposals from at least four other property owners in the Township and has received presentations from a non-profit housing concern, from governmental agencies that provide financing for low and moderate income housing, from historic preservation groups and various environmental groups, including the Stony Brook Millstone Watershed Association, which had applied for leave to appear amicus.

To illustrate the intensities of the meeting processes, I can report that the Planning Board and the Township Committee have met on October 25, November 5, November 20, November 28, November 29 and December 4, 1984. Two meetings are scheduled

for tomorrow, December 6th. One, a workshop meeting between a few members of the Township Committee and Planning Board, and the other a full meeting of the Township Committee and the Planning Board. While it is hoped that the process can be finalized at tomorrow's meeting, the written documents would have to be substantially revised before being submitted to the court. If the process cannot be finalized tomorrow night, at least one more meeting will be required. The compliance program is presently in its second draft and is 125 pages long. It is felt that the printing of the final draft will require at least one additional week.

For these reasons, it is respectfully requested that the deadline for the submission of the Plan be extended until December 21, 1984. We have discussed this with Phil Caton, and he is in concurrence with this request.

Respectfully submitted,


WILLIAM C. MORAN, JR.

WCM:Dak

cc: All counsel of record