

U.L. v. Carteret

April 15, 1986

N. Brunswick

Letter to Judge Serpentelli submitting that Mr. Leffkowitz's
form of order & Judgment of Respite should not be signed,
ck N. Brunswick Service List.

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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

April 15, 1986

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

Re: Urban League, et al. vs. Carteret, et al. (North Brunswick)

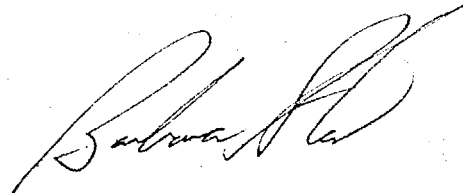
Dear Judge Serpentelli:

This is in reply to the letter of Leslie Lefkowitz, Esq. dated April 8, 1986. We agree that Section 22(b) of the Fair Housing Act was designed "to benefit prior settling municipalities." It is for that reason that we agreed that North Brunswick's repose should run from the date of the Act, rather than from the date of the September 1984 settlement. The Township should not be granted an additional period of repose for its subsequent failure to implement in a timely manner certain provisions of that settlement.

Moreover, Mr. Lefkowitz ignores the fact that Your Honor has already signed and filed our previously submitted Order and Judgment of Repose. Under these circumstances, execution of the form of Order urged by Mr. Lefkowitz would improperly result in two Orders differing only in the date of repose. There is no motion before this Court to vacate the signed Order. Nor is there any basis for such a motion, since Mr. Lefkowitz does not deny receipt of the two prior forms of Order and Judgment of Repose which set forth the July 2, 1991 date.

For all of the foregoing reasons, it is respectfully submitted that Mr. Lefkowitz's form of Order and Judgment of Repose should not be signed.

Respectfully submitted,



cc/North Brunswick Service List

RULS-ML-5269

SERVICE LIST

URBAN LEAGUE v. CARTERET, No. C 4122-73 (North Brunswick)

Leslie Lefkowitz, Esq.
1500 Finnegans Lane
North Brunswick, NJ 08902

Stewart M. Hutt, Esq.
459 Amboy Avenue
Woodbridge, NJ 07095

Douglas K. Wolfson
Engelhard Building
PO Box 5600
Woodbridge, NJ 07095

Donald R. Daines, Esq.
K. Hovnanian Companies of NJ
10 Highway 35, PO Box 500
Red Bank, NJ 07701

Frederic Kessler, Esq.
Clapp & Eisenberg
80 Park Plaza
Newark, NJ 07102