

ULv-Cestret, Plain show 21 May (1987)

Final letter and drafts to Mr. Stonaker,  
requesting response to previous proposal,

+ office memo

4 pgs

CA00063SL

THE STATE UNIVERSITY OF NEW JERSEY  
**RUTGERS**  
Campus at Newark

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

May 21, 1987

VIA LAWYERS SERVICE

Joseph Stonaker, Esq.  
41 Leigh Avenue  
Princeton, NJ 08540

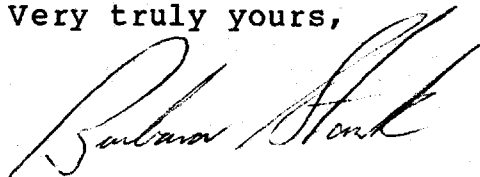
RE: Urban League, et al. v. Carteret, et al.

Dear Mr. Stonaker:

As of this date, we have not yet received a response to our proposal of October 2, 1986, despite your assurances in February that same would be forwarded by March 11, 1987. John Payne, Esq. has advised that he has not heard from you since his telephone conversation with you on March 16, 1987, pursuant to which you were to contact us after you had discussed the possibility of trust fund contributions with certain developers and Princeton.

Please be advised that if there is no significant progress in this matter within two weeks, the Civic League may have no alternative but to file the appropriate motion with the Court in accordance with paragraph 7 of the July 30, 1985 Consent Order.

Very truly yours,



cc/C. Roy Epps, President  
Civic League of Greater New Brunswick

JP

DRAFT - For your review.

Joseph Stonaker, Esq.

Princeton, NJ 08540

Dear Mr. Stonaker:

I have been unable to reach you by telephone to discuss the status of this matter. We are still waiting for Plainsboro to make a counter offer to our proposal of September \_\_\_\_\_.

We agree, of course, that Alan Mallach's assistance in this matter has been (and will hopefully continue to be) invaluable. His services should not be necessary for Plainsboro's determination of the fair share number to be included in its counterproposal, especially in view of his substantial role in determining the number set forth in the Civic League's original proposal.

You assured us that we would receive a response from Plainsboro by March. As you know, we have received nothing. Please be advised that if we do not receive a good faith counterproposal within 10 days, we may have no alternative but to file the appropriate application with the Court.

Very truly yours,

JP

DRAFT - For your review.

Joseph Stonaker, Esq.

Princeton, NJ 08540

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I have been unable to reach you by telephone to discuss the status of this matter. We are still waiting for Plainsboro to make a counter offer to our proposal of ~~September~~ *October 2, 1987*<sup>6</sup>.

We agree, of course, that Alan Mallach's assistance in this matter has been (and will hopefully continue to be) invaluable. His services should not be necessary for Plainsboro's determination of the fair share number to be included in its counterproposal, especially in view of his substantial role in determining the number set forth in the Civic League's original proposal.

You assured us that we would receive a response from Plainsboro by March. As you know, we have received nothing. Please be advised that if we do not receive a good faith counterproposal within 10 days, we may have no alternative but to file the appropriate application with the Court.

Very truly yours,

University/devs → \$ to trust fund  
w/o legal challenge  
subsidize rents

needs financial expertise

Sup - need # /st

SS - have rental units  
need trust fund t.f

JS - # is ~ 350/400 units (approx)

The deal is: Joe will negotiate t-f contributions from developers and Princeton. No \$ amount stated but it will be substantial. They will agree not to challenge impact fees, even if a contrary decision by the courts. Money to be used for rental subsidies.

When Joe gives me a \$ figure, we will ask alan to evaluate in terms of what # of units that money can produce. We will agree that he can be a p-boro consultant for that purpose. After that # is agreed upon, we will then negotiate a final revision of f-sh # with Joe, keeping at least theoretically open the possibility that we will require something other than the t-f units at that point.

(Private note: if we can get 425 subsidized rentals, many of them low, I'd settle.)