

V L v. Carteret (South Plainfield) 25 July 1985

letter requesting extended notice of motion
in order to ~~allow~~ transfer actions to council
on affordable housing

5 pgs

post # 1000

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July 25, 1985

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

Re: Urban League v. Carteret (South Plainfield), No. C 4122-73

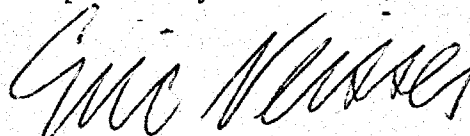
Dear Judge Serpentelli:

On July 23, we received a copy of South Plainfield's Notice of Motion to Transfer Action to Council on Affordable Housing and accompanying documents. Your Honor has informed us that you have already rejected the Borough's request for hearing of that motion on short notice. We write now to request not just normal but extended notice, because we think the motion, the first made in this case under the new and as yet uninterpreted statute, requires careful preparation of an extensive response, including a detailed presentation of crucial factual matters and expert opinions as well as briefing of the many novel legal issues. We have also learned informally that transfer motions are likely to be filed by Cranbury, Monroe and Piscataway Townships in the near future. If so, it might well be appropriate to consolidate all of these motions with South Plainfield's for argument and decision.

Specifically, we suggest that the Urban League plaintiffs' responding papers should not be due before August 30 at the earliest, and perhaps later depending upon when the other motions to transfer are filed, their complexity, and the degree of their variation from the first one. Oral argument could be held within a week after all papers are due.

To facilitate matters, I am sending copies of this letter-request for extension of time to the township attorneys as well as others involved in this action concerning Cranbury, Monroe, and Piscataway as well as to the service list for South Plainfield.

Respectfully submitted,



Eric Neisser

Co-Counsel for Urban League

cc/South Plainfield Service List
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Piscataway Service List

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