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March 13, 1986

Frank Santoro, Esq. 1500 Park Avenue South Plainfield, NJ 07080

Dear Mr. Santoro,

It is apparent from your refusal to return any of my telephone calls over the last week that you no longer intend to extend to me the normal attorney courtesy of responding to phone calls. At least you could have had the courtesy to communicate that position to me through your secretary.

I have been calling to find out, as per our last conversation, whether the South Plainfield Council has introduced on first reading an ordinance to repeal or modify Ordinances No. 1009 and 1010 and if so, the date it is scheduled for second reading. In addition, I today received a telephone call from Gene Mohan who is still waiting for closing of title on his purchase of Borough property, for which the Borough has held \$15,500 of his since August. He said that he spoke to you this past Monday, March 10, and that you said you were waiting for the Urban League to sign some paper. I have received no paper in connection with the escrow of the funds from the sale of the Mohan site, although you are fully aware that the Urban League has been in favor of, indeed first proposed, exactly that arrangement six months ago when the Borough first improperly insisted that buyers put up the full purchase price.

Please notify me in writing of your response or whether you no longer respond in writing either. You will note that the Supreme Court's opinion expressly notes that the conduct of the municipality and its officials may be considered in determining the scope of conditions placed upon a transfer. Page 89.

Sincerely yours,

Eric Neisser Co-Counsel for Urban League

cc: John George, Esq.