

U.L. v. Carter - Piscataway 11/14/84 1984

Motion For Temp. Rest. Order & Injunctive
Injunction.

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ATTORNEYS FOR PLAINTIFFS

URBAN LEAGUE OF GREATER
NEW BRUNSWICK, et al.,

Plaintiffs,

vs.

THE MAYOR AND COUNCIL OF
THE BOROUGH OF CARTERET,
et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MIDDLESEX COUNTY

Civil Action C 4122-73

MOTION FOR TEMPORARY
RESTRAINING ORDER AND
INTERLOCUTORY INJUNCTION

PLEASE TAKE NOTICE that on Wednesday, Nov. 14, 1984
at 9:00 A.M., or as soon thereafter as counsel may be heard,
plaintiffs in this action will move for an Order restraining the
Township of Piscataway Council, Planning Board, and Zoning Board
of Adjustment from approving any application or taking any other
action, with respect to any vacant site which is identified on
the Vacant Land Inventory (attached as Exhibit A) and which
has been identified as being "satisfactory" for Mt. Laurel
development in the preliminary report of the court-appointed expert,
Carla Lerman, P.P., which would permit development of any site
for any use that does not require a minimum 20% set aside of low
and moderate income housing consistent with Mt. Laurel II,

11-8-84

92 N.J. 158 (1983).

PLEASE TAKE FURTHER NOTICE that plaintiffs will also move for an Order directing the Township of Piscataway Council, Planning Board and Zoning Board of Adjustment, upon receipt of any application with respect to any site identified in paragraph 1 above, or upon learning of plans to submit such an application, to notify the applicant or property owner of the existence of this Order, and of the landowner's right to move upon short notice to all parties that for good cause shown, restraints be vacated as to their property[ies].

Dated: November 7, 1984


BARBARA J. WILLIAMS
ATTORNEY FOR PLAINTIFFS

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Dated: November 7, 1984


BARBARA J. WILLIAMS
ATTORNEY FOR PLAINTIFFS



11/14/84

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

November 7, 1984

The Honorable Eugene D. Serpentelli
Judge, Superior Court
Ocean County Court House, CN 2191
Toms River, New Jersey 08753

Re: Urban League v. Carteret, Civ C 4122-73

Dear Judge Serpentelli:

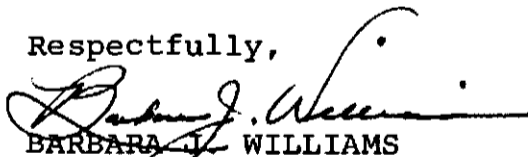
I am enclosing plaintiffs' Notice of Motion for a Temporary Restraining Order and Interlocutory Injunction, supporting Affidavit of the undersigned and a proposed Order in the above-referenced matter.

I am also enclosing a copy of the Memorandum in support of Motion for Temporary Restraining Order and Interlocutory Injunction submitted by plaintiffs last month with respect to the Reidhal, Inc. property which is equally applicable to the present Motion.

I would appreciate the Court setting a short return date in view of the fact that the Lackland Brothers, Inc. site (#76) is the subject of an application to be heard by the Piscataway Planning Board on Wednesday, November 14, 1984 at 8:00 PM.

I thank the Court for its assistance in this matter.

Respectfully,



BARBARA J. WILLIAMS

cc/All Counsel on annexed service list

NOTE to Counsel: Just Serpentelli has set *Wednesday*
November *14*, 1984 at *9:00*
as the return day of plaintiffs'
Motion.

encls

SERVICE LIST

Urban League v. Carteret, Civ C 4122-73 (Superior Court, Chancery
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