

U.L. v. Carteret

Dec 20, 1984

Piscataway

Notice of Motion For Leave To Appeal An Interlocutory  
Order & For Stay of Enforcement Pending  
Appeal

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ATTORNEYS FOR

**Defendant**  
**Township of Piscataway**

SUPERIOR COURT OF NEW JERSEY  
APPELLATE DIVISION

Docket No. C-4122-73

URBAN LEAGUE OF GREATER NEW :  
BRUNSWICK, et al., :  
 :  
Plaintiff/Appellee, :  
 :  
vs. :  
 :  
THE MAYOR AND COUNCIL OF THE :  
BOROUGH OF CARTERET, et al., :  
 :  
Defendant/Appellant.:  
 :  
\_\_\_\_\_ :

Civil Action

NOTICE OF MOTION FOR LEAVE  
TO APPEAL AN INTERLOCUTORY  
ORDER AND FOR STAY OF ENFORCE-  
MENT PENDING APPEAL

TO: Mr. John Mayson  
Clerk  
Superior Court  
Trenton, New Jersey

Barbara Williams, Esq.  
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Washington, D.C. 20005

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

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned, attorneys for the Defendant/Appellant Township of Piscataway (herein "Piscataway") will move for an order (a) granting Piscataway leave to appeal an interlocutory order dated December 11, 1984 issued by the Superior Court of New Jersey, Chancery Division (Middlesex/ Ocean Counties) restraining Piscataway from granting preliminary or final approval or taking any other actions with respect to the development of any site within the Township of Piscataway designated as "suitable" for Mount Laurel development in the report of Carla Lerman, the court appointed expert, and (b) staying enforcement of the order of the court below pending appeal.

The basis for the within application is that the relief granted below is overly broad and will cause irreparable harm to Piscataway, and, further, that an interlocutory appeal is required in the interests of justice, as is more particularly set forth in the accompanying

Brief in Support of Motion for Leave to Appeal an Interlocutory Order and for Stay of Enforcement Pending Appeal.

KIRSTEN, FRIEDMAN & CHERIN  
A Professional Corporation  
Attorneys for Defendant/Appellant,  
TOWNSHIP OF PISCATAWAY

  
Phillip Lewis Paley

Dated: December 20, 1984