

Piscataway (1985) UL v. Piscataway 11/19/85  
Cover letter ⊕ Application for stay of trial

Page = 21

Yellow P.I. # 3145

CA 000 ~~8470~~  
~~8614~~  
863

KIRSTEN, FRIEDMAN & CHERIN

A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW  
17 ACADEMY STREET  
NEWARK, N. J. 07102  
(201) 623-3600

RICHARD E. CHERIN\*  
HAROLD FRIEDMAN  
JACK B. KIRSTEN\*  
PHILLIP LEWIS PALEY\*  
DENNIS C. LINKEN

MARGARET E. ZALESKI  
JOHN K. ENRIGHT  
SHARON MALONEY-SARLE  
LIONEL J. FRANK\*  
RICHARD M. METH

November 19, 1985

JOSEPH HARRISON (1930-1976)  
MILTON LOWENSTEIN  
OF COUNSEL

\*MEMBER N.J. & N.Y. BARS  
◊MEMBER D.C. BAR

Honorable Eugene D. Serpentelli  
Judge, Superior Court of New Jersey  
Ocean County Court House  
Toms River, New Jersey 08754

Re: Urban League of Greater New Brunswick  
vs. Township of Piscataway et al.

My Dear Judge Serpentelli:

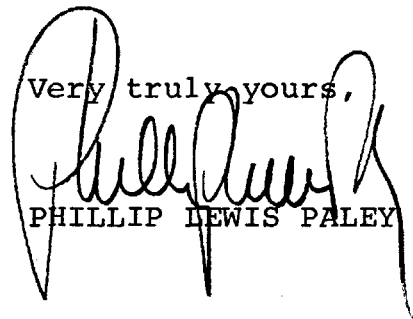
This will confirm my conversations with your law clerk, Patricia, on November 18, 1985, regarding Your Honor's advisement that you would entertain Piscataway's Application for a Stay of Trial Court Proceedings on Friday, November 22, 1985, at 10:00 A.M. It is my understanding that Your Honor will consider the Application without the necessity of prior written submissions, but that such submissions, whether by Piscataway or any other party, will not be foreclosed.

By copy of this letter I am hereby giving notice of my Application to all parties on the service list. I also represent to the Court that I have called John Payne, Esq.,

attorney for the Urban League, and Raymond Trombadore, Esq.,  
attorney for the Gerichonts, to apprise them of the date and time.

Your Honor's usual courtesy and cooperation in this  
matter are greatly appreciated.

Very truly yours,



PHILLIP LEWIS PALEY

PLP:Pmmn

cc: All attorneys on the attached Service List

KIRSTEN, FRIEDMAN & CHERIN

A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW  
17 ACADEMY STREET  
NEWARK, N. J. 07102  
(201) 623-3600

RICHARD E. CHERIN\*  
HAROLD FRIEDMAN  
JACK B. KIRSTEN\*  
PHILLIP LEWIS PALEY\*  
DENNIS C. LINKEN

MARGARET E. ZALESKI  
JOHN K. ENRIGHT  
SHARON MALONEY-SARLE  
LIONEL J. FRANK\*  
RICHARD M. METH

JOSEPH HARRISON (1930-1976)  
MILTON LOWENSTEIN  
OF COUNSEL

November 19, 1985

\*MEMBER N.J. & N.Y. BARS  
◊MEMBER D.C. BAR

Honorable Eugene D. Serpentelli  
Judge, Superior Court of New Jersey  
Ocean County Court House  
Toms River, New Jersey 08754

Re: Urban League of Greater New Brunswick, et al.  
v. The Mayor and Council of the Borough of  
Carteret, et al.  
Docket No. C-4122-73

My dear Judge Serpentelli:

Kindly accept the within letter in support of Piscataway's application for a stay of trial court proceedings pendant before Your Honor, which application will be argued before the Court on Friday, November 22, 1985.

This application is brought before the Court in light of an Order dated November 13, 1985, entered in the Supreme Court of New Jersey (A-131-September Term, 1985 - 24-787), a copy of which is appended hereto.

Honorable Eugene D. Serpentelli  
Page Two  
November 19, 1985

By way of summary of the most recent aspects of the procedural history of this litigation, during September, 1985, Piscataway applied before this Court to transfer this matter from the Superior Court of New Jersey to the Affordable Housing Council, an administrative entity created by the Fair Housing Act. On October 3, 1985, extensive argument was heard in support of and in opposition to Piscataway's obligation; the argument was consolidated with similar arguments brought by the municipalities of Cranbury, Monroe, South Plainfield, and Warren. This Court determined that Piscataway's application to transfer should be denied, and it executed an Order to that effect on October 11, 1985.

On October 23, 1985, Piscataway filed with the Appellate Division of the Superior Court a Notice of Motion seeking leave to appeal, among other things. Piscataway also sought an emergent stay of all trial court proceedings as to it, in light of the Judgment entered in this Court directing that Piscataway submit a compliance package by October 23, 1985. That application was denied; the remainder of Piscataway's applications were lodged for filing with the Appellate Division.

Honorable Eugene D. Serpentelli  
Page Three  
November 19, 1985

Thereafter, the plaintiff Urban League moved in this Court for an Order directing Carla Lerman, Court-appointed Master, to immediately commence work on a compliance plan for Piscataway. Piscataway, by way of Cross-Motion, sought an extension of time within which to file its compliance plan. On November 8, 1985, this Court granted Piscataway an extension until December 2, 1985, upon certain conditions including the clear possibility that, if Piscataway demonstrated reasonable progress, the extension would be continued until December 23, 1985. A form of Order reflecting the relief granted by this Court has been submitted to the Court under the five day rule but has not yet been executed.

On Thursday, November 14, 1985, I received a telephone call from Stephen Townsend, Clerk of the Supreme Court, advising that the Supreme Court had determined, pursuant to R. 2:12-1, to certify all appeals of Orders relating to applications to transfer litigation to the

Honorable Eugene D. Serpentelli  
Page Four  
November 19, 1985

Affordable Housing Council directly. On Monday, November 18, 1985, I received a copy an Order dated November 13, 1985, reflecting that direct certification and granting leave to appeal, among other things. The Supreme Court did not stay the trial court proceedings but did address that issue:

...jurisdiction in these matters otherwise remains in the Superior Court, Law Division; provided, however, that any party may make an application to the Law Division to stay further proceedings in that Court pending the resolution of the within appeal and provided further that the direct review of the disposition of such a stay application may be sought from this Court by any aggrieved party.

The Supreme Court's Order of November 13, 1985, was transmitted by letter dated November 15, 1985. That letter, a copy of which is appended hereto, provides that initial briefs are to be exchanged between the parties on or before December 2, 1985, with responsive briefs to be submitted before December 11, 1985. The letter delineates a number of issues to be addressed by each party. The

Honorable Eugene D. Serpentelli  
Page Five  
November 19, 1985

accompanying exhibits make clear that the Court intends to consider the various appeals expeditiously.

With respect to the instant application for a stay, Piscataway wishes to emphasize the following points:

A. In light of the extraordinary attention given this matter by the Supreme Court of New Jersey, it may be clearly inferred that the Supreme Court intends to brook no delay in the prosecution of these appeals. Therefore, even if the Supreme Court is likely to decide this case adversely to Piscataway, the likelihood of extensive delay to be sustained by any plaintiff in Piscataway's case is remote, if at all existent. Therefore, no plaintiff will suffer any irreparable harm as a result of the grant of any stay.

*Burdens  
not on us.*

B. The Supreme Court clearly intends to review with care and deliberation the language employed by the State Legislature in adopting the Fair Housing Act, an act made effective on July 2, 1985, and never before inter-



Honorable Eugene D. Serpentelli  
Page Six  
November 19, 1985

preted by any court of appellate jurisdiction. Substantial constitutional and interpretational questions are presented in this process which may render prior Orders entered in this and other courts academic.

C. Piscataway is presently under order to actively pursue the preparation of a compliance package, in coordination with the Master. This entails substantial attention, time, and effort. To comply with this Court's earlier Order, Piscataway must pay the Master for her time, its Planner, for his, its attorney, and other professionals who may become involved in this proceeding. If there is any possibility that much of the work involved might be rendered academic, it would appear wiser to defer the completion of that work until the Supreme Court renders its interpretive decision.

*increased  
w/ MUE*

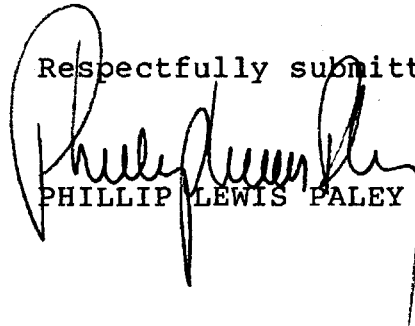
D. Plaintiffs suffer no hardship whatever by the granting of a stay, particularly where non-Mt. Laurel development on the bulk of suitable parcels has been restrained by Order of this Court dated December 11, 1984.

*Burden  
on landowners*

Honorable Eugene D. Serpentelli  
Page Seven  
November 19, 1985

Therefore, pursuant to Crowe v. DeGioia, 90  
N.J. 126 (1982), this Court should grant a stay in this  
matter, pending the proceedings before the Supreme Court of  
New Jersey.

Respectfully submitted,



PHILLIP LEWIS PALEY

PLP:bhp  
Enclosures

URBAN LEAGUE OF GREATER NEW  
BRUNSWICK, et al.,

24,787

Plaintiffs,

v.

(C-4122-73)

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

Defendants.

and

THE TOWNSHIP OF PISCATAWAY,  
etc.,

Defendant-Appellant.

-----

It is ORDERED that pursuant to Rule 2:12-1, the motion for leave to appeal from the Order of the Superior Court, Law Division, Middlesex/Ocean County, entered in this cause on October 11, 1985, and now pending in the Superior Court, Appellate Division, is hereby certified directly to this Court; and it is further

ORDERED that leave to appeal is granted; and it is further

ORDERED that the Clerk of the Appellate Division shall transmit briefs, appendices, and transcripts filed in that court to the Clerk of this Court, and all parties shall forthwith file with the Clerk of this Court four additional copies of all briefs and appendices that have previously been filed with the Appellate Division; and it is further

ORDERED that jurisdiction in these matters otherwise remains in the Superior Court, Law Division; provided, however, that any party may make an application to the Law Division to stay further proceedings in that court pending the resolution of the within appeal and provided further that direct review of the disposition of such a stay application may be sought from this Court by any aggrieved party.

WITNESS, the Honorable Robert N. Wilentz, Chief Justice,  
at Trenton, on this 13th day of November, 1985.

  
CLERK OF THE SUPREME COURT

A TRUE COPY.

  
CLERK

SUPREME COURT OF NEW JERSEY

STEPHEN W. TOWNSEND  
CLERK

KEITH M. ENDO  
DEPUTY CLERK



OFFICE OF THE CLERK  
CN 970  
TRENTON, N.J. 08625

November 15, 1985

- Re: A-122 The Hills Development Co. v. Tp. of Bernards (#24,780)  
A-123 Helen Motzenbecker v. Bernardsville (#24,781)  
A-124 Urban League v. Carteret (Cranbury) (#24,782)  
A-125 Morris Co. Fair Housing Council v. Boonton (Denville)  
(#24,783)  
A-126 Real Estate Equities, Inc. v. Holmdel (#24,784)  
A-127 Urban League of New Brunswick v. Carteret (Monroe)  
(#24,785)  
A-128 Morris Co. Fair Housing Council v. Boonton (Randolph)  
(#24,786)  
A-129 Urban League of New Brunswick v. Carteret (So. Plainfield)  
(#24,788)  
A-130 AMG Realty Co. v. Facey v. Warren Tp. (#24,789)  
A-131 Urban League v. Carteret (Piscataway) (#24,787)  
A-132 Rivell v. Tewksbury (#24,790)  
A-133 J. W. Field Company, Inc. v. Tp. of Franklin (#24,799)

Dear Counsel\*:

I enclose a copy of the Supreme Court's order directly certifying the above matters and granting leave to appeal. The Court has accelerated the time for preparation of these matters. The parties in each case are to exchange briefs simultaneously on or before December 2, 1985. Responses to those filings are to be served and filed on or before December 11, 1985. It is suggested that messenger or overnight delivery services be used to avoid delay.

The Court has a number of issues that it would like the parties to address. The briefs you are to file pursuant to the above schedule, however, do not have to be limited to those issues, a list of which are attached.

The Court will be hearing argument on a date to be scheduled after the submission of initial briefs. In all likelihood, counsel in the matters selected for argument will be directed to choose several attorneys from among their number to present joint arguments.

\*see attached lists

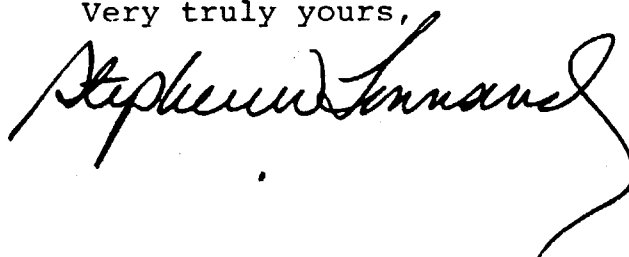
In order to minimize the duplication of effort in the preparation of briefs, the Court urges counsel to prepare and file joint submissions particularly in matters that have multiple parties such as the Cranbury and Denville cases.

For those attorneys who are participating in more than one case, you need file only a single brief. The brief's caption should identify each case that is being addressed in the body of the brief.

You are to submit nine copies of all briefs to this office, including copies of the briefs filed with the trial court on the motion to transfer. Copies must, of course, be served on the adversaries within your particular appeal. In addition, copies of all briefs must be served upon the Attorney General, the Public Advocate, and any amici curiae that the Court might allow to participate. In turn, the briefs of those parties will be served on counsel in all cases.

The Court has requested that the Attorney General prepare a complete legislative history of the Fair Housing Act. Copies will be served on all counsel. You may submit comments and suggested additions or deletions as a part of your initial brief.

Very truly yours,



SWT/tsg

attachments

## ISSUES TO BE ADDRESSED

1. All parties in the initial exchange of briefs should address:
  - a. the meaning of "manifest injustice" including what factors should be considered in determining what is manifest injustice. If delay in the implementation of the Act (i.e., in the construction of housing) or any similar factor is listed, counsel should present, in support of the position taken, an analysis of the time it would take to afford relief pursuant to the Act.
    - i) Assuming that a balancing test is advocated, what relative weight should be given to each factor?
    - ii) What is proper scope of review by an appellate court of the trial court's determination of the manifest injustice issue?
  - b. Does the builders' remedy moratorium apply to a municipality if a motion to transfer to the Housing Council is denied and either all appeals have been exhausted or no appeals have been taken?
  - c. The Act provides for different treatment of transfer applications depending upon whether the party making application commenced suit 60 days or more before the adoption of the Act. How should applications be treated in an action when made by more than one party, one of whom filed a complaint 60 days or more before the effective date of the Act and one of whom did not?
2. Any builder or any other party who intends to argue that the Act is invalid in whole or part shall notify adversaries in the case immediately by phone that such position will be taken in the brief. In case of such notice, the parties on both sides in that case shall brief the invalidity issues on the initial exchange of briefs, including any claims of:
  - a) facial invalidity of the entire statute;
  - b) invalidity of any part of the Act, considering it both on its face and as it might be applied, including the following parts:
    - 1) moratorium on builders' remedies;

- 2) alleged conflict between mandatory consideration by the Council on Affordable Housing and the constitutional power of courts to dispense with exhaustion requirements in matters in lieu of prerogative writs;
  - 3) definition of region;
  - 4) credits against fair share;
  - 5) alleged delay in enforcement of constitutional obligation;
  - 6) requirement, in determining prospective need, that consideration be given to approvals of development applications, real property transfers, and economic projections prepared by State Planning Commission; and
  - 7) effect of settlement set forth in §22 of the Act; and
- c) severability.



COUNSEL LIST

A-122 The Hills Development Co. v. Tp. of Bernards (#24,780)

James E. Davidson, Esq. - Township of Bernards  
c/o Farrell, Curtis, Carlin & Davidson, Esqs.  
43 Maple Ave., P.O. Box 145, Morristown, 07960  
201-267-8130

Henry A. Hill, Esq. - Hills Development Company  
c/o Brener, Wallack & Hill, Esqs.  
2-4 Chambers St., Princeton, 08540  
609-924-0808  
(also A-125/A-133)

A-123 Helen Motzenbecker v. Bernardsville (#24,781)

J. Albert Mastro, Esq. - Warren Twp. Sewerage Authority  
7 Morristown Road, Bernardsville, 07924  
201-766-2720

Douglas K. Wolfson, Esq. - Motzenbecker  
c/o Greenbaum, Rowe, Smith, Ravin, Davis & Bergstein, Esqs.  
Gateway One, Newark, 07102  
201-623-5600  
(also A-125/A-126/A-133)

A-124 Urban League v. Carteret (Cranbury)  
(#24,782)

Stewart M. Hutt, Esq. - Zirinsky  
c/o Hutt, Berkow, Hollander & Jankowski, Esqs.  
459 Amboy Avenue, Woodbridge, 07095  
201-634-6400  
(also A-133)

Michael J. Herbert, Esq. - Zirinsky  
c/o Sterns, Herbert & Weinroth, Esqs.  
186 W. State Street, Trenton, 08607  
609-392-2100

Carl S. Bisgaier, Esq. - Monroe Development/Cranbury Land Co.  
c/o Bisgaier & Pancotto, Esqs.  
510 Park Blvd., Cherry Hill, 08034  
609-665-1911  
(also A-126)

William C. Moran, Jr. - Township of Cranbury  
c/o Huff, Moran & Balint, Esqs.  
Cranbury-South River Road, Cranbury, 08512  
609-655-3600

William L. Warren, Esq. - Garfield and Company  
c/o Warren, Goldberg, Berman & Lubitz, Esqs.  
112 Nassau Street, Box 645, Princeton, 08540  
609-924-8900

Harry S. Pozycki, Jr., Esq. - Cranbury Historic Society  
c/o Frizell & Pozycki, Esqs.  
296 Amboy Ave., P.O. Box 247, Metuchen, 08840  
201-494-3500  
(also A-133)

A-125 Morris Co. Fair Housing Council v. Boonton (Denville) (#24,783)

Arthur Penn, Esq. - Affordable Living Corp.  
10 Sylvan Way, Parsippany, 07054

Dennis A. Murphy, Esq. - Angelo Cali  
c/o Harkavy, Goldman, Goldman & Caprio, Esqs.  
667 Eagle Rock Avenue, West Orange, 07052

Douglas K. Wolfson, Esq. - Siegler Associates/Essex Glen, Inc.  
c/o Greenbaum, Rose, Smith, Ravin, Davis & Bergstein, Esqs.  
PO Box 5600, Woodbridge, NJ 07095  
(also A-123/A-126/A-133)

Barney K. Katchen, Esq. - Maurice & Esther H. Soussa  
c/o Citrino, Balsam, DiBiasi & Daunno, Esqs.  
345 Centre Street, Nutley, 07110  
201-235-1414

Guliet D. Hirsch, Esq. - Stonehedge Associates  
c/o Brener, Wallack & Hill, Esqs.  
2-4 Chambers St., Princeton, NJ 08540  
(also A-122/133)

Stephan C. Hansbury, Esq. - Denville Twp.  
c/o Harper & Hansbury, Esqs.  
736 Speedwell Ave., Box 198, Morris Plains, 07950  
201-540-9500

A-126 Real Estate Equities, Inc. v. Holmdel (#24,784)

Douglas K. Wolfson, Esq.  
c/o Greenbaum, Rowe, Smith, Ravin, Davis & Bergstein, Esqs.  
Gateway One, Newark, 07102  
201-623-5600  
(also A-123/A-125)

Carl Bisgaier, Esq. - Real Estate Equities  
c/o Bisgaier & Pancotto, Esqs.  
510 Park Blvd., Cherry Hill, NJ 08034  
609-655-3600  
(also A-124)

J. Peter Sokol, Esq. - Gideon Adler  
c/o McOmber & McOmber, Esqs.  
54 Shrewsbury Ave., Red Bank, 07701  
201-842-6500

Scott F. Jamison, Esq. - Twp. of Hazlet  
c/o Lautman, Rapson, Henderson & Mills, Esqs.  
107 Main Street, Manasquan, 08736  
201-223-0800

Ronald L. Reisner, Esq. - Twp. of Holmdel  
c/o Gagliano, Tucci, Iadanza & Reisner, Esqs.  
1090 Broadway, PO Box 76, W. Long Branch, NJ 07764-0067  
201-229-6700

A-127 Urban League of New Brunswick v. Carteret (Monroe) (#24,785)

Arnold Mytelka, Esq. - Lori Associates/Habd Associates  
c/o Clapp & Eisenberg, Esqs.  
80 Park Plaza, Newark, 07102  
201-642-3900

Eric Neisser, Esq. - Urban League  
John Payne, Esq.  
Rutgers School of Law  
S.I. Newhouse Center for Law & Justice  
15 Washington St., Newark, 07102  
201-648-5687  
(also A-129/A-131)

Mario Apuzzo, Esq. - Monroe Township  
Perrineville Road, Jamesburg, 08831  
201-521-4400

A-128 Morris Co. Fair Housing Council v. Boonton (Randolph) (#24,786)

Richard T. Sweeney, Esq. - Randolph Mountain Industrial Complex  
c/o Sears, Pendleton & Sweeney, Esqs.  
57 Old Bloomfield Avenue, Mountain Lakes, 07046  
201-334-1011

Edward J. Buzak, Esq. - Twp. of Randolph  
Montville Office Park  
150 River Road, Suite A-4, Montville, 07045  
201-335-0600

A-129 Urban League of New Brunswick v. Carteret (So. Plainfield)  
(#24,788)

Eric Neisser, Esq.  
John Payne, Esq.  
Rutgers School of Law S.I. Newhouse  
Center for Law & Justice  
15 Washington St., Newark, NJ 07102  
201-648-5687  
(also A-127/A-131)

Frank A. Santoro, Esq. - Borough of South Plainfield  
1500 Park Avenue  
P.O. Box 272, South Plainfield, 07080  
201-561-6868

William V. Lane, Esq. - South Plainfield Bd. of Adjustment  
c/o Johnstone, Skok, Loughlin & Lane, Esqs.  
324 E. Broad St., Box 490, Westfield, 07091  
201-233-9000

A-130 AMG Realty Co. v. Facey v. Warren Tp. (#24,789)

J. Albert Mastro, Esq. - Warren Twp. Sewerage Authority  
7 Morristown Road, Bernardsville, 07924  
201-766-2720

John E. Coley, Jr., Esq. - Warren Township  
c/o Kunzman, Coley, Yospin & Bernstein, Esqs.  
15 Mountain Blvd., Warren, 07060  
201-757-7800

Eugene W. Jacobs, Esq. - Warren Township Planning Board  
c/o Handelman & Jacobs, Esqs.  
381 North Avenue, Dunellen, 08812  
201-968-2525

Joseph E. Murray, Esq. - Z.V. Associates  
c/o McDonough, Murray & Korn, Esqs.  
555 Westfield Ave., P.O. Box O, Westfield, 07091  
201-233-9040

Raymond R. and Ann W. Trombadore, Esqs. - Timber Properties  
33 E. High St., Somerville, 08876  
201-722-7555

A-131 Urban League v. Carteret (Piscataway) (#24,787)

Eric Neisser, Esq.  
John Payne, Esq.  
Rutgers School of Law  
S.I. Newhouse Center for Law & Justice  
15 Washington St., Newark, 07102  
201-648-5687  
(also A-127/A-129)

Philip L. Paley, Esq. - Piscataway Township  
c/o Kirsten, Friedman & Cherin, Esqs.  
17 Academy St., Newark, 07102  
201-623-3600

A-132 Rivell v. Tewksbury (#24,790)

Thomas J. Beetel, Esq.  
20 Main St., Flemington, NJ 08822  
201-788-1921

Richard Dieterly, Esq.  
Gebhardt & Kiefer, Esqs.  
21 Main St.  
Clinton, NJ 08809  
201-735-5161

A-133 J. W. Field Company, Inc. v. Franklin (#23,799)

Thomas J. Cafferty, Esq.  
McGimpsey & Cafferty, Esqs.  
1445 U.S. Route 130,  
North Brunswick, NJ 08902  
201-297-8300

Francis P. Linnus, Esq.  
Lanfrit & Linnus, Esqs.  
15 Cedar Grove Lane, Suite 24, Somerset, NJ 08873

Emil H. Philibosian, Esq.  
1580 Amwell Road, PO Box 249, Middlebush, NJ 08873

Douglas K. Wolfson, Esq.  
Greenbaum, Rowe, Smith, Ravin, Davis & Bergstein, Esqs.  
PO Box 5600, Woodbridge, NJ 07095  
(also A-123/A-125/A-126)

Guliet F. Hirsch, Esq.  
Brener, Wallack & Hill, Esqs.  
2-4 Chambers St., Princeton, NJ 08540  
(also A-122/A-125)

Mark H. Rochkind, Esq.  
7 Cleveland St., Caldwell, NJ 07006

Stewart M. Hutt, Esq.  
Hutt, Berkow, Hollander & Janowski, Esqs.  
PO Box 648, Woodbridge, NJ 07095  
(also A-124)

Allen Russ, Esq.  
743 Highway 18, PO Box 278, East Brunswick, NJ 08816

David J. Frizell, Esq.  
Frizell & Pozycki, Esqs.  
PO Box 247, Metuchen, NJ 08840  
(also A-124)

Herbert J. Silver, Esq.  
838 Easton Ave., Somerset, NJ 08873

William T. Cooper, Esq.  
25 West High St., Somerville, NJ 08876

William P. Westling, Esq.  
Westling, Lime & Welchman, Esqs.  
71 Route 206 South, PO Box 626, Somerville, NJ 08876

All Cases

Stephen Endorfer, Esq.  
Assistant Deputy Public Advocate  
CN 1850  
Hughes Justice Complex  
Trenton, NJ 08625

Deborah T. Poritz, Esq.  
Deputy Attorney General  
CN 112  
Hughes Justice Complex  
Trenton, NJ 08625

SERVICE LIST

Urban League v. Carteret, Civ C 4122-73 (Superior Court, Chancery  
Div., Middlesex County) (Piscataway)

Phillip Paley, Esq.  
Kirsten, Friedman & Cherin  
17 Academy St., Newark, N.J. 07102

Douglas K. Wolfson  
Greenbaum, Greenbaum, Rowe,  
Smith, Bergstein, Yohalen,  
& Bruch  
Englehard Building  
P.O. Box 5600  
Woodbridge, N.J. 07095

Michelle Donato, Esq.  
Frizell & Pozycki  
PO Box 247, Metuchen, N.J. 08840

Chris A. Nelson, Esq.  
Venezia & Nolan  
306 Main St., Woodbridge, N.J. 08095

Eric Neisser, Esq.  
John Payne, Esq.  
Constitutional Litigation  
Clinic  
Rutgers Law School  
15 Washington Street  
Newark, New Jersey 07102

Raymond R. Trombadore, Esq.  
Trombadore & Trombadore  
33 E. High St., Somerville, N.J. 08376

Daniel S. Bernstein, Esq.  
Bernstein, Hoffman & Clark  
336 Park Avenue, Scotch Plains, N.J. 07076

Glen S. Pantel, Esq.  
Shanley & Fisher  
95 Madison Ave., Morristown, N.J. 07960

Thomas Kelso, Esq.  
132 Hamilton Street  
New Brunswick, New Jersey 089

Lawrence A. Vastola, Esq.  
Vogel, Vastola & Gast  
10 Johnston Drive  
Watchung, N.J. 07060

Lawrence B. Litwin, Esq.  
Scerbo, Kobin, Litwin & Wolff  
10 Park Place, Morristown, N.J. 07960

Guliet D. Hirsch, Esq.  
Brener, Wallack & Hill  
2-4 Chambers St., Princeton, N.J. 08540

Angelo H. Dalto, Esq.  
Abrams, Dalto, Gran, Hendricks & Reina  
1550 Park Ave., South Plainfield, N.J. 07080

Donald R. Daines, Esq.  
K. Hovnanian Companies of New Jersey  
10 Highway 35, PO Box 500  
Red Bank, New Jersey 07701

John Dusinberre, Esq.  
155 Prospect Street  
West Orange, N.J. 07052

Howard Gran, Esq.  
Abrams, Dalto, Gran, Hendricks & Reina  
1550 Park Avenue, South Plainfield, N.J. 07080

Edwin Kunzman, Esq., Kunzman, Kunzman & Yoskin  
15 Mountain Blvd WARREN N.J. 08866