

U.L. v. Carteret

(8/22)

August 22, 1986

Piscataway (assuming)

Letter to Judge • brief reply to Paley

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August 22, 1986

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

Re: Urban League, et al. v. Carteret, et al.

Dear Judge Serpentelli:

This is by way of brief reply to the letter of Phillip Paley, Esq. dated August 20, 1986. First, unlike the Civic League in Mr. Paley's 1984 example, Mr. Paley never filed a Notice of Motion with supporting papers here. The Civic League plaintiffs, accordingly, had no opportunity to address the substance of his demand until receipt of his proposed form of Order.

Second, absent an express directive from the Court or the Executive Commission on Ethical Standards, there is absolutely no legal basis for Mr. Paley's novel suggestion that the Affordable Housing Council has jurisdiction over questions arising under N.J.S.A. 52:13D-16(a) et seq.

Finally, Mr. Paley has conspicuously failed to respond to the gist of the Civic League's objection; that is, the lack of any pending application to be transferred to the Council and the corresponding absence of any possible harm to Piscataway by the denial of its instant application. It is respectfully submitted that there is neither reason nor need for the entry of Mr. Paley's proposed Order at this time.

Respectfully,

cc/Phillip Paley, Esq.

