

UL v. Carteret, ?

9-Oct-85

Letter to Neisser re preparation of ordinances to  
Comply with judgment

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October 9, 1985

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Eric Neisser, Esq.  
Rutgers, the State University  
Constitutional Litigation Clinic  
15 Washington Street  
Newark, New Jersey 07102

Re: Urban League vs. Carteret et al.

Dear Mr. Neisser:

I have your letter dated October 7, 1985.

As you know, the Judgment signed by Judge Serpentelli was not entered until September 17, 1985. Despite that, the Township Planner, Assistant Planner, and other Planning officials have been endeavoring to prepare ordinances which we believe will provide for approximately 2,215 Mount Laurel units throughout the Township. We followed the language of the September 17 Judgment, as to both letter and spirit.

You correctly point out that on August 30, 1985, at my suggestion, municipal officials picked up Exhibits to permit them to comply with the Judgment.

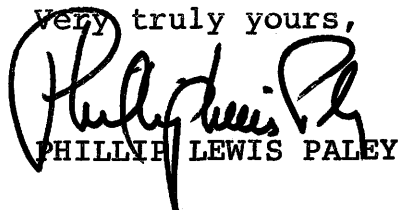
I cannot speak for the members of the governing body of the Township, but I have previously pointed out that the

effective date of the Judgment, which I did not receive until your office forwarded it to me several days thereafter, provided too little time for any coordination whatever with the Master. I continue to adhere to that position. We will do whatever is possible and feasible to endeavor to comply with Judge Serpentelli's Judgment, but we are neither magicians nor supermen.

Apropos of your last paragraph, you may take whatever action you wish at any time regarding applications to the Court. Perhaps the appropriate time to raise objections to a request is after the request has been made. Perhaps, further, it is hardly necessary for you to copy Judge Serpentelli on letters which are self-serving and of an obnoxious tone. I am copying Judge Serpentelli, only to keep the records straight, and in response to your having done so in the first place.

In the future, if you try to persuade the Court to take a position, I suggest you do it formally, rather than through mere <sup>PLP</sup> correspondence.//

Very truly yours,



PHILLIP LEWIS PALEY

PLP:pmmn

cc: Honorable Eugene Serpentelli  
Mr. Paul A. Abati, Business Administrator