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Memo re: Cranbury Historical &
Preservation Society to appear as
amici.

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December 11, 1984

Honorable Eugene D. Serpentelli
Superior Court of New Jersey
Court House
CN-2191
Toms River, New Jersey

RE: Urban League of Greater New Brunswick, et al.
v. Borough of Carteret et al.

Dear Judge Serpentelli:

Please accept this memorandum of law in lieu of a formal brief in regard to the above-captioned matter.

Cranbury Historical and Preservation Society and Cranbury Landmarks, Inc. are non-profit corporations dedicated to the preservation of the Cranbury Village, a designated historic district which is on the National Register of Historic Places. Thomas J. Sadlowski and Richard Walling are individuals in Middlesex County who have been extensively involved in the area of historic preservation. These parties seek to present testimony and argument to the court in connection with the remedial stage of the Mount Laurel litigation pending against Cranbury Township. The purpose of this presentation is to apprise the court of the impact upon the historic district of a potential Mount Laurel rezoning. The amici would hope to provide information which can assist the Court in mitigating the impact of new construction upon the historic Village of Cranbury.

The amici would comply with a schedule of briefing and submission of reports which the Court may require. There will be no interference with the Court's already established proceedings. Nor will the amici's participation prejudice any of the parties to this litigation. The parties would seek to assist the Court in resolving an issue of major public importance.

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We believe that the participation of independent historic preservationists in the upcoming phase of the Cranbury Township decision will assist the Court in the resolution of the difficult questions presented and can provide a source of information which will prove invaluable in the long and short term.

It is therefore respectfully requested that the motion be granted permitting Cranbury Historical Preservation Society, Cranbury Landmarks, Inc., Thomas J. Sadlowski and Richard Walling to participate in the Cranbury Township portion of the Urban League litigation.

Respectfully Submitted



Michele R. Donato

MRD/baf