CA - North Bruswick

1/9/84

Letter in lias of formal certification and brief in opposition to p's notion.

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CARL BRANCIFORTE MEMBER OF N.J. & N.Y. BARS

January 9, 1984

File No. TNB-186

Honorable Eugene D. Serpentelli Court House Toms River, New Jersey

Re: URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al vs: THE MAYOR AND COUNCIL OF THE BOROUGH OF CARTERET, et al Docket No. C-4122-73

Dear Judge Serpentelli:-

Please be advised that the undersigned is municipal attorney for the defendant Township of North Brunswick.

Kindly accept this letter in lieu of a formal certification and brief in opposition to Plaintiff's motion to join the Township of North Brunswick. I apologize for the lateness of this reply. As of January 1, 1984, the Township of North Brunswick has gone through a re-organization of its form of government. As a result, I was unable to formally meet with my Mayor and Council until the date of this letter.

The Township of North Brunswick is firmly opposed to being joined in the above-entitled action. The Township feels that its Zoning Ordinance is constitutional and valid; and in any event, will be prejudiced by a joinder in this lawsuit at such a late date.

I respectfully request that the Plaintiff's motion be denied. I do not request oral argument.

Respectfully yours,

LESLIE S. LEFKOWITZ sm cc: ALL COUNSEL:

9 January 1984

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Frank Askin, Esq. Eric Neisser, Esq. John Payne, Esq. Constitutional Litigation Clinic Rutgers Law School

Bruce S. Gelber, Esq. Janet Labella, Esq. National Committee Against Discrimination in Housing

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