CA- Old Bridge

11/2/84

Notice of motion on behalf of P for an order to receive copies of correspondence, accelerate time schedule, etc.

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CA002354N

2-4 Cham Princeton (609) 924- Attorneys	WALLACK & HILL bers Street , New Jersey 08540 0808 for Plaintiff O&Y Old Bridge ent Corporation		
	URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al., Plaintiffs, v. THE MAYOR AND COUNCIL of the BOROUGH OF CARTERET, et al.,		
THE MAY			
	Defendants, D BRIDGE DEVELOPMENT ATION, a Delaware ion, Plaintiff,	•	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MIDDLESEX COUNTY/ OCEAN COUNTY (Mount Laurel II)
v.	,	:	(<u></u>
THE TOWNSHIP OF OLD BRIDGE in the		•••••••••••••••••••••••••••••••••••••••	Docket No. L-009837-84 P.W. CIVIL ACTION NOTICE OF MOTION
T0:	Defendants. Jerome J. Convery, Esq. P.O. Box 872 Old Bridge, NJ 08857 Stewart Hutt 459 Amboy Ave., PO Box 648 Woodbridge, NJ 07095 Thomas Norman, Esq. Jackson Commons	:	Barbara Williams, Esq. John Payne, Esq. Constitutional Litigation Clinic Rutgers Law School 15 Washington Street Newark, NJ 07102 Bruce S. Gelber, Esq. National Com. Against Discrimination
	Suite A-2 30 Jackson Road Medford, NJ 08055		In Housing 733 Fifteenth Street, N.W., Suite 1026 Washington, D.C. 20005

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PLEASE TAKE NOTICE that on Friday, November 16, 1984, at 9:00 a.m. or as soon thereafter as counsel may be heard, counsel for Plaintiff Olympia & York Old Bridge Development Corp. will move before the Honorable Eugene D. Serpentelli, J.S.C., Ocean County Courthouse, Toms River, New Jersey, for an Order:

- (1) declaring that the captioned matters are fully consolidated so that Plaintiff Olympia & York may be empowered to; (a) receive copies of any future correspondence circulated in these lawsuits; (b) attend and participate in all discussions or meetings concerning this litigation; (c) submit suggestions, including suggested ordinance revisions, to Defendant Township; and (d) attempt to enter into a settlement with Defendant Township;
- setting forth an accelerated time schedule for; (a) review by the Master of the current status of this litigation and; (b) submission of a compliant ordinance by the Defendant Township;
- (3) directing that, in the event that the Township does not submit a compliant ordinance within the time allotted by this Court, Olympia & York will be entitled to apply to this Court for imposition of the appropriate sanctions.

PLEASE TAKE FURTHER NOTICE that, in support of this application, Plaintiff Olympia & York will rely on the enclosed memorandum and the exhibits and affidavit attached thereto.

Respectfully submitted,

BRENER, WALLACK & HIL

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Thomas J. Hall

Attorneys for Plaintiff Olympia & York Old Bridge Development Corporation

Dated: November 2, 1984

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