

CA

Old Bridge

12-23-86

NOM to set aside order & judgment
of repose from 1-24-86; to stay
transfer to COAH

~~RECEIVED COUNTY~~

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CA 002368N

JEROME J. CONVERY, ESQ.
151 Route 516
P.O. Box 642
Old Bridge, NJ 08857
(201) 679-0010
Attorne for Defendants

URBAN LEAGUE OF GREATER NEW
BRUNSWICK, et al.,

Plaintiffs,

v.

THE MAYOR AND COUNCIL of the
BOROUGH OF CARTERET, et al.,

Defendants,

and

O & Y OLD BRIDGE DEVELOPMENT
CORPORATION, a Delaware
Corporation,
and

WOODHAVEN VILLAGE, INC., a
New Jersey Corporation,

Plaintiffs,

v.

THE TOWNSHIP OF OLD BRIDGE in
the COUNTY OF MIDDLESEX, a
Municipal Corporation of the
State of New Jersey, THE TOWNSHIP
COUNCIL OF THE TOWNSHIP OF
OLD BRIDGE, THE MUNICIPAL
UTILITIES AUTHORITY OF THE
TOWNSHIP OF OLD BRIDGE, THE
SEWERAGE AUTHORITY OF THE
TOWNSHIP OF OLD BRIDGE and
THE PLANNING BOARD OF THE
TOWNSHIP OF OLD BRIDGE,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MIDDLESEX COUNTY/
OCEAN COUNTY
(Mount Laurel II)

DOCKET NO. C-4122-73

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MIDDLESEX COUNTY/
OCEAN COUNTY
(Mount Laurel II)

DOCKET NO. L-009837-84 P.W
and No. L-036734-84 P.W.

Civil Action

NOTICE OF MOTION

TO: BRENER, WALLACK & HILL
2-4 Chambers Street
Princeton, NJ 08540

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Constitutional Litigation Clinic
15 Washington Street
Newark, NJ 07102

GENTLEMEN and LADY:

PLEASE TAKE NOTICE that on January 16, 1986 at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, JEROME J.

CONVERY, Attorney for the Township of Old Bridge, will move before the Honorable Eugene Serpentelli, A.J.S.C., for an Order as follows:

1. To set aside the Order and Judgment of Repose concerning the Township of Old Bridge, dated January 24, 1986, pursuant to Rule 4:50-1;
2. For an Order transferring jurisdiction over this matter from the Court to the New Jersey Council on Affordable Housing;
3. For such other relief as the Court deems fair and reasonable.

The undersigned counsel will rely upon the Certification of Jerome J. Convery, Esq. attached hereto, as well as the Certifications of Henry Bignell, Old Bridge Township Planner, Carl Hintz, P.P., Old Bridge Township Planning Consultant, and appendices attached thereto. The Certifications of

Mr. Bignell, and Mr. Hintz , and the Letter Brief will be forwarded under separate cover.

DATED: December 23, 1986



JEROME J. CONVERY, ESQ.
Attorney for Defendant, Township of
Old Bridge