

CA - Old Bridge

4/7/89

Certification of Gwen Orlewski, 2nd yr  
Student at RU - law school Newark,

p 3

familiar w/ facts of case, participant  
in Constitutional law clinic

CA002432V



available yet. She also told me that she could provide me with copies of memos but that maps could not be copied nor could she copy the 600 page proposal because of its length.

3. On February 15, 1989, I went to the Old Bridge Planning Board office in the Municipal Complex. Ms. Van Buren gave me a large box containing O&Y records from the January 10, 1989 Planning Board meeting. She told me that she could not copy any materials from the box for me "because [she] did not have the time." Later, she agreed to copy no more than 10 sheets.

4. I saw communications and studies suggesting to me that negotiations relating to the development had been in progress since at least November 1988. In fact, as stated on page 1 of the Resolution (Epp's Certification, Exhibit F), O&Y had submitted a master report for the General Development Plan in March, 1988.

5. Among the papers in the box, I found and read a December 28, 1988 letter from Steven Gray, Esq., of Waters, McPherson, McNeil, & Fitzpatrick, setting out a time table by which O&Y hoped to complete certain stages of site plan approval. The letter proposed the following "tentative schedule":

By April 1, 1989, submit a Preliminary Subdivision Plan; by April 30, 1989, hold public hearing and receive Preliminary Subdivision/Site Plan Approval; and by May 21, 1989, submit Final Subdivision Plan.

4. I asked Ms. Van Buren to make a copy of the letter for me. After consulting with another office worker, Ms. O'Malley, she told me that I was not allowed to have a copy and that I should call Mr. Gray's office to get his permission for a copy.

I was told that I could only receive a copy of those items that had been read into the record. According to Ms. Van Buren, Mr. Gray's letter had not been read into the record.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: April 7, 1989

A handwritten signature in cursive script, appearing to read "Gwen Orlowski", written over a horizontal line.

Gwen Orlowski