CA- Old Bridge

5/1/89

Notice of motion for an order to permit

O+4 Old Bridge to re-enter above ceptioned

matter as a party, for purpose of Opposing

Cnic League's motion for a stay + remembler

plenary hearing

CA 002438N

## **BRENER, WALLACK & HILL**

210 CARNEGIE CENTER PRINCETON, NEW JERSEY 08543-5226 (609) 924-0808 ATTORNEYS FORPlaintiff

0 & Y Old Bridge Development Corporation

BRUNSWICK, et al.,

URBAN LEAGUE OF GREATER NEW : SUPERIOR COURT OF NEW JERSEY

APPELLATE DIVISION

Plaintiff-Appellants, : Docket Nos. A-4335-87T3

A-4572-87T3

٧.

A-4752-87T3

THE MAYOR AND COUNCIL OF THE : BOROUGH OF CARTERET, et al., :

CIVIL ACTION

Defendants,

ON APPEAL FROM SUPERIOR COURT

OF NEW JERSEY

and

LAW DIVISION (MOUNT LAUREL) MIDDLESEX COUNTY (VENUE)

OCEAN COUNTY (TRIAL)

O & Y OLD BRIDGE DEVELOPMENT: CORPORATION, a Delaware Corp.,

SAT BELOW:

Plaintiff-Appellant, :

Eugene D. Serpentelli, A.J.S.C.

٧.

NOTICE OF MOTION

THE TOWNSHIP OF OLD BRIDGE in the COUNTY OF MIDDLESEX, a municipal Corporation of the State of New Jersey, et al.,

Defendants-Respondents.

TO: All Parties on Service List.

PLEASE TAKE NOTICE, that the undersigned attorney for the plaintiff, 0 & Y Old Bridge Development Corporation hereby moves before the Superior Court of New Jersey, Appellate Division, for an Order to permit 0 & Y Old Bridge Development Corporation to re-enter the above captioned matter as a party, for the purpose of opposing the Civic League's motion for a stay and remand for plenary hearing, and in the event that this Court remands this matter to the trial court, that 0 & Y be permitted to remain in the case.

PLEASE TAKE FURTHER NOTICE, that the undersigned will rely upon annexed letter brief in support of said motion.

Thomas Jay Hall, Esquire

Attorney for Plaintiff, 0 & Y Old Bridge Development Corporation

Dated: MA 1, 1789