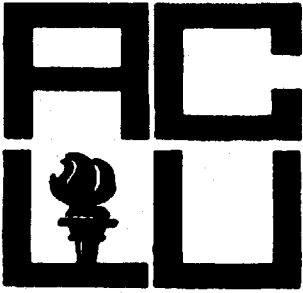


- Attorney letter to ACLU re pleadings in Edison case (not included)

Pgs. 2

P.i. 5171

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American Civil Liberties Union of New Jersey

38 Walnut Street
Newark, New Jersey 07102
(201) 642-2084

Edward Martone
Executive Director

Annamay Sheppard
President

Eric Neisser
Legal Director

June 16, 1988

Louie Nickolaides, Esq.
Clifton & Schwartz
401 Broadway
Suite 403
New York, N.Y. 10013

Re: Civic League of Greater New Brunswick v.
Township of Edison, Docket No. L-837688

Dear Louie:

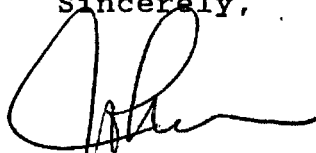
Enclosed are the pleadings in the Edison case, together with a draft of the Consent Order approved by Judge Serpentelli in a phone conference on Wednesday afternoon. Please note that the case has been transferred to COAH by the judge's order.

On Edison's representations that no residential developments of more than 5 acres would be approved before the Planning Board meeting of July 20 (except for Rivertown), I agreed not to press for formal restraints on such developments. It is understood, however, that we will seek "scarce land" restraints before COAH, and we must act quickly to have them in place before July 20. COAH normally requires a 20-day notice period (N.J.A.C. 5:91-13.4) on motions, but permits emergent relief on application to the Executive Director (609-530-6663). Both Art Bernard, the Deputy Director, and Don Palombi (609-292-7669), the DAG assigned to COAH, are familiar with the proceedings in this case to date.

As you know, I cannot involve myself in the COAH proceedings in any way. As soon as I contact him, Roy will formally ask COAH for mediation and review, but you will have to carry the ball on restraints. I believe I am permitted to brief you on the pre-COAH court proceedings, and will do everything I can within the idiotic ethics ruling to help.

Best wishes.

Sincerely,



John M. Payne