

U.L. v. Piscataway

August 20, 1986

Letter from Paley to Judge asking to  
execute firm of order.

Pgs 3

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August 20, 1986

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Honorable Eugene D. Serpentelli  
Judge, Superior Court of New Jersey  
Ocean County Court House  
Toms River, New Jersey 08754

Re: Urban League of Greater New Brunswick  
et al. vs. Township of Piscataway et al.

My Dear Judge Serpentelli:

I have the August 19, 1986, letter of Barbara Stark,  
Esq.

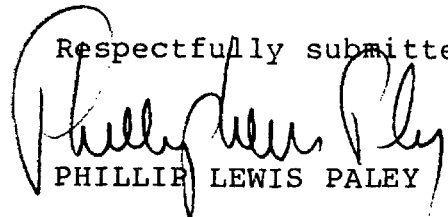
During the past weekend, I took the opportunity to  
prune some of the old Mount Laurel files. I discovered that,  
in November, 1984, following Your Honor's determination that  
substantial restraints were appropriate in Piscataway, Barbara  
Williams, Esq., of the Constitutional Litigation Clinic, sub-  
mitted a form of Order to the Court. I objected to the form  
of Order on various grounds in a timely letter objection. Your  
Honor executed the Order forwarding the Order to all counsel  
with a letter reminding me that objections to the form of  
Order should be addressed to the form, not to the substance.

The first paragraph of Ms. Stark's letter addresses the substance, not the form, of my Order and should be disregarded by the Court.

With respect to the propriety of the Constitutional Litigation Clinic appearing before the Affordable Housing Council, I suggest that the Clinic has the standing to raise that inquiry before the Council, which is now fully operative. From August 4 until the present time, no such application has, to my knowledge, been lodged.

To the extent that Ms. Stark alleges that Piscataway has, with malice aforethought, disregarded Orders of this Court, may I respectfully respond by noting that we are one of three municipalities statewide which has put Mount Laurel housing in the ground? That, when Ms. Stark pointed out that one error had been made with respect to a ten-acre site, the approval formally given to the developer was formally rescinded? That the public officials of Piscataway have more than their "fair share" of integrity and honor? That any inference to the contrary is simply not supported by the facts?

I respectfully ask that Your Honor execute the form of Order previously submitted to you at your convenience.

Respectfully submitted,  
  
PHILLIE LEWIS PALEY

PLP:pmmn

cc: Barbara Stark, Esq.