

South Plainfield 1985

letter to Judge re: request for Expert re-inspection

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School of Law-Newark • Constitutional Litigation Clinic  
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October 30, 1985

The Honorable Eugene D. Serpentelli  
Judge, Superior Court  
Ocean County Court House  
CN 2191  
Toms River, New Jersey 08754

RE: Urban League v. Carteret, No. C 4122-73  
(South Plainfield)

Dear Judge Serpentelli:

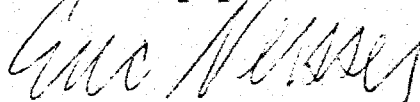
I write in reference to Mr. Barcan's motion on behalf of Harris Steel, which seeks to drastically reduce the number of Mount Laurel units to be produced on this site.

The Urban League plaintiffs intend to oppose the Harris Steel motion and to reiterate the position embodied in the May 22, 1984 Judgment that the entire 85 acre site is suitable for residential development at 12 units per acre. To this end, we will submit an affidavit of Mr. Mallach and other appropriate papers next week.

The Borough has, of course, already stipulated as to the site's suitability and Ms. Lerman had reviewed the site and approved it during her review in May 1984. Nevertheless, if the Court believes it appropriate to hear any site suitability issues on November 12, we think it would be most efficient if Ms. Lerman could re-inspect the site before that date. If we are correct in our assumption, we would respectfully ask that the Court request that Ms. Lerman make such a re-inspection before the 12th.

Thank you for your consideration of this request.

Sincerely yours,



Eric Neisser  
Co-Counsel for Urban League

cc: Carla Lerman  
South Plainfield Service List  
Stephen Barcan, Esq.