

Holmdel 1984

10/31

Letter to Judge re Objections to Proposed Form of Order

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October 31, 1984

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JUDGE SERPENTELLI'S CHAMBERS

Honorable Eugene D. Serpentelli  
Judge of the Superior Court  
Ocean County Court House  
CN 2191  
Toms River, NJ 08753

Re: Real Estate Equities, Inc.  
v. Holmdel Township  
Docket No. L-015209-84PW

Dear Judge Serpentelli:

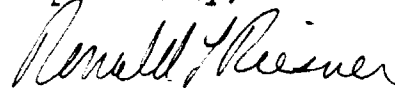
On October 30, 1984 we received a copy of Mr. Wolfson's proposed form of Order and we object to the form thereof. Specifically, we object to the last two lines of the first page and the first two lines of the second page in view of the arguments at the pre-trial conference regarding the time of decision rule.

The proposed Order should read instead:

"and the Township of Holmdel not having offered any proofs regarding the zoning ordinance in effect at the time of the filing of the complaints by Plaintiffs with respect to the Township's responsibilities pursuant to Mt. Laurel II;"

It has always been our position that the ordinance in effect at the time of the filing of the complaints, together with Holmdel Ordinance 84-7 which amends that ordinance, now fully meets all of Holmdel's responsibilities.

Respectfully,



Ronald L. Reisner

RLL/pm

cc: Douglas A. Wolfson, Esq.  
Carl S. Bisgaler, Esq.  
J. Peter Sokol, Esq.