MMML General 1-May-1984 Notice of Motion for Learn to Trile Amended Complaint and for Temporary Restraining Order and Interlocutory Injunction in Mt. Laurel Litigerion.

pgr = 2_

MLCOO461NOEMZ



ML000481NO{M}

ERIC NEISSER, ESQ* JOHN PAYNE, ESQ. Constitutional Litigation Clinic Rutgers Law School 15 Washington St., Newark, N.J. 07102 201/648-5687

BRUCE S. GELBER, ESQ. JANET LA BELLA, ESQ. National Committee Against [Discrimination in Housing 733 - 15th St. NW, Suite 1026 Washington, D.C. 20005 202/783-8230

ATTORNEYS FOR PLAINTIFFS

SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION-MIDDLESEX COUNTY

URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al, ,

Plaintiffs,

vs.

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

Defendants.

TO:

The Honorable Eugene Serpentelli Ocean County Court House Toms River, New Jersey

Mr. Lewis Bambrick Clerk Superior Court Trenton, New Jersey

All Counsel

Chris A. Nelson, Esq. Attorney for Piscataway Planning Board

Harry E. Bernstein, Esq. Attorney for 287 Associates

Michael F. DeCapua, Esq. Attorney for Halocarbon Products Corp.

Lawrence A. Vastola, Esq. Attorney for Algin, Inc. Civil Action

Docket No. C 4122-73

NOTICE OF MOTION FOR LEAVE TO FILE AMENDED COMPLAINT AND FOR TEMPORARY RESTRAINING ORDER AND INTERLOCUTORY INJUNCTION PLEASE TAKE NOTICE that on Monday, May 7, 1984 at 9:30 A.M. or as soon thereafter as counsel may be heard, plaintiffs in this action will Jnove for an order granting leave to file an Amended Complaint and restraining the Planning Board of the Township of Piscataway from granting preliminary approval or taking other action on three pending applications and directing the Planning Board to provide the plaintiffs with two weeks notice of any ' intended action affecting vacant land in Piscataway.

In support of this motion, plaintiffs rely upon the Affidavits of Bruce Gelber and Alan Mallach, the Amended Complaint, and Plaintiffs' Memorandum of Law in Support of Motion for Leave to File Amended Complaint and For Temporary Restraining Order and Interlocutory Injunction. A proposed Order is attached.

Andre

BRU'E GIN BER JANET LA BELLA ERIC NEISSER JOHN PAYNE 15 Washington Street Newark, New Jersey 07102 201/648-5687 ATTORNEYS FOR PLAINTIFFS

Dated: May 1, 1984