

~~PLM~~ ML - Piscataway

29-June-1984

Notice of Motion for an Order  
Striking all testimony adduced  
from witnesses relating to the  
Fair Share formula, and an order  
granting a new trial on that issue

pgs = 5

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**KIRSTEN, FRIEDMAN & CHERIN**  
A PROFESSIONAL CORPORATION

17 ACADEMY STREET  
NEWARK, NEW JERSEY 07102  
(201) 623-3600

ATTORNEYS FOR DEFENDANT, TOWNSHIP OF PISCATAWAY

<hr/>		X
URBAN LEAGUE OF GREATER NEW BRUNSWICK, ET AL.,	:	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION MIDDLESEX COUNTY
	:	
Plaintiffs,	:	DOCKET NO. C-4412-73
	:	
vs.	:	
TOWNSHIP OF PISCATAWAY, ET AL.,	:	CIVIL ACTION
	:	
Defendants.	:	NOTICE OF MOTION
<hr style="border-top: 1px dashed black;"/>		X

TO: ERIC NEISSER, ESQ.  
JOHN PAYNE, ESQ.  
CONSTITUTIONAL LITIGATION CLINIC  
Rutgers Law School  
15 Washington Street  
Newark, New Jersey 07102

ALL ATTORNEYS ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that the undersigned, attorney  
for the Township of Piscataway, a Municipal Corporation of the

State of New Jersey, a Defendant herein, will, on Friday, July 19, 1984, at 9:00 A.M. in the forenoon or as soon thereafter as counsel may be heard, apply before the Honorable Eugene Serpentelli, Judge of the Superior Court of New Jersey, for an Order striking all testimony adduced from witnesses relating to the development of, and application of, a consensus methodology for the purpose of allocating a fair share of low and moderate income housing among Defendant municipalities, and granting a new trial on the issues in this action.

PLEASE TAKE FURTHER NOTICE THAT the undersigned will rely upon the attached Certification in support of this argument.

PLEASE TAKE FURTHER NOTICE THAT the Defendant, Township of Piscataway, requests oral argument on this Motion.

KIRSTEN FRIEDMAN & CHERIN  
A Professional Corporation  
Attorneys for Defendant,  
TOWNSHIP OF PISCATAWAY

By:

  
PHILIP LEWIS PALEY

DATED: June 29, 1984

STATE OF NEW JERSEY )  
COUNTY OF ESSEX )

ss.:

AFFIDAVIT OF MAILING

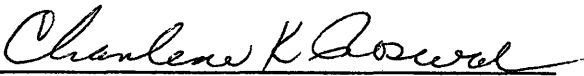
PATRICIA M. MONTANILE, of full age, being duly sworn according to law upon her oath, deposes and says:

1. I am a legal secretary employed by the firm of Kirsten, Friedman & Cherin, a Professional Corporation, attorneys for the Defendant, Township of Piscataway, in the within cause of action.

2. On June 29, 1984, I caused to be delivered by regular mail to the Clerk, Superior Court of New Jersey, Middlesex County, and to Eric Neisser, Esq. and John Payne, Esq., Constitutional Litigation Clinic, Rutgers Law School, 15 Washington Street, Newark, New Jersey 07102, attorneys for Plaintiff herein, a copy of the within Notice of Motion, together with attachments.

  
PATRICIA M. MONTANILE

Sworn to and subscribed before me this 29th day of June, 1984.



CHARLENE K. BOSWAL  
A NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Dec. 17, 1994

SERVICE LIST

Michael J. Herbert, Esquire  
STERNS, HERBERT AND WEINROTH, P.A.  
186 West State Street  
P.O. Box 1298  
Trenton, New Jersey 08607  
Attorneys for Plaintiff, Lawrence Zirinsky

William C. Moran, Esquire  
HUFF, MORAN AND BALINT  
Cranbury-South River Road  
Cranbury, New Jersey 08512  
Attorneys for Defendant, Mayor and The Township Committee of the  
Township of Cranbury, a municipal corporation, and the members thereof

Joseph L. Stonaker, Esquire  
STONAKER AND STONAKER, ESQUIRES  
41 Leigh Avenue  
P.O. Box 570  
Princeton, New Jersey 08540  
Attorneys for defendant, The Planning Board of the Township of Cranbury,  
and the members thereof

Richard Schatzman, Esquire  
MCCARTHY AND SCHATZMAN, P.A.  
6 Charlton Street  
P.O. Box 2329  
Princeton, New Jersey 08540  
Attorneys for Plaintiffs, Joseph Morris and Robert Morris

Thomas R. Farino, Jr., Esquire  
Corner of Applegarth and Half Acre Roads  
Cranbury, New Jersey 08512  
Attorney for Plaintiff, Cranbury Development Corporation, a Corporation  
of the State of New Jersey

Carl S. Bisgaier, Esquire  
BISGAIER AND LOEFFLER  
510 Park Boulevard  
Cherry Hill, New Jersey 08034  
Attorney for Plaintiff, Cranbury Land Company, a New Jersey Limited  
Partnership

Bruce S. Gelber, Esquire  
Janet LaBella, Esquire  
National Committee Against Discrimination in Housing  
1425 H. Street NW  
Suite 410  
Washington, D.C. 20005  
Attorney for Plaintiff, Urban League of Greater New Brunswick

Bertram Busch, Esquire  
BUSCH AND BUSCH, ESQUIRES  
99 Bayard Street  
P.O. Box 33  
New Brunswick, New Jersey 08903  
Attorney for Defendant, Borough of South Plainfield

Stewart M. Hutt, Esq.  
459 Amboy Avenue - Box 648  
Woodbridge, New Jersey 07095

Patrick J. Dieg<sup>^</sup> -f<sup>^</sup>r., Esquire  
1308 Durham Avenue  
South Plainfield, New Jersey 07080  
Attorney for Defendant, Township of South Brunswick

Joseph Benedict, Esquire  
247 Livingston Avenue  
New Brunswick, New Jersey 08902  
Attorney for Defendant, Township of South Brunswick

BERNSTEIN, HOFFMAN AND CLARK, ESQUIRES  
336 Park Avenue  
Scotch Plains, New Jersey 07076  
Attorneys for Defendant, Township of Piscataway

Lawrence B. Litwin, Esquire  
SCERBO, LOBIN, LITWIN AND WOLFF, ESQUIRES  
10 Park Place  
Morristown, New Jersey 07960  
Attorneys for Plaintiffs, Bronwing-Ferris Industries of South Jersey,  
Inc., a corporation of the State of New Jersey, Richcrete Concrete  
Company, a corporation of the State of New Jersey, and Mid-State  
Filigree Systems, Inc., a corporation of the State of New Jersey

Eric Neisser, Esquire  
John Payne, Esquire  
CONSTITUTIONAL LITIGATION CLINIC, Room 338  
Rutgers Law School  
15 Washington Street  
Newark, New Jersey 07102

Leslie Lefkowitz, Esquire  
1500 Finnegans Lane, P.O. Box 3049  
North Brunswick, New Jersey 08902  
Attorney for Defendant, Township of North Brunswick

Guliet D. Hirsch, Esquire  
**BRENER, WALLACK & HILL**  
2-4 Chambers Street  
Princeton, New Jersey 08540  
Attorney for Toll Brothers, Inc.

*Raymond Trombadore, Esq.*

Michael Noto, Esquire  
151 Route 516  
P.O. Box 607  
Old Bridge, New Jersey 08857  
Attorney for Township of Old Bridge

**William L. Warren, Esq.**  
**Warren Goldberg Berman &**  
**Lubitz**  
112 Nassau Street  
P. O. Box 645  
Princeton, New Jersey 08540

Arnold K. Mytelka, Esquire  
CLAPP & EISENBERG  
80 Park Plaza  
Newark, New Jersey 07102  
Attorneys for Plaintiffs, Lori Associates & Hadb Associates