

ML 2

Lincoln Park

Oct. 85

Certification of Wayne S. Peck,

§

p. 2

ML 000714 V

Hutt, Berkow & Jankowski
 459 Amboy Avenue
 PO Box 648
 Woodbridge, NJ 07095
 (201) 634-6400
 Attorneys for Plaintiffs

Plaintiff,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
JOSEPH RENDEIRO, GEORGE C. PECK	:	
and HOVBILT, INC., a New Jersey	:	MORRIS COUNTY/VENUE
Corporation	:	MIDDLESEX COUNTY/TRIAL
	:	
vs.	:	
	:	
Defendants,	:	Docket No.: L-042457-85
	:	
BOROUGH OF LINCLON PARK, a	:	
Municipal Corporation located in	:	MT. LAUREL II
Morris County and LINCOLN PARK	:	Civil Action
PLANNING BOARD	:	
	:	CERTIFICATION

Wayne J. Peck, Esq., being of full age, upon his oath deposes and says:

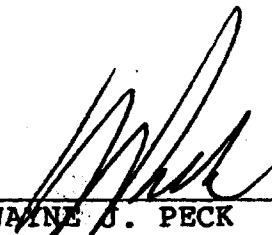
1. I am an Attorney at Law of New Jersey, am an associate with the firm of Hutt, Berkow & Jankowski, P.C., and am the attorney charged with the handling of this matter.
2. A Complaint was filed on May 20, 1985, in this matter.
3. Since May 20, 1985, new events have occurred which give rise to additional claims by plaintiffs against defendant Borough of Lincoln Park. All such causes of action relate to the property which is the subject matter of the Complaint and are based upon developmental approvals sought in Lincoln Park.
4. The Supplemental Complaint alleges, inter alia, that Ordinance 814 of defendant Borough of Lincoln Park is cost generating while

being unrelated to health or safety, all in violation of the New Jersey Constitution as interpreted in Mount Laurel II.

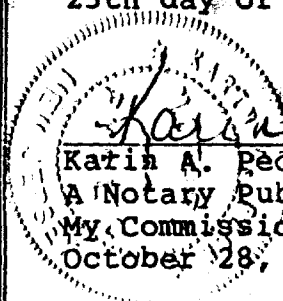

5. All of the issues alleged in the Supplemental Complaint could be brought via a new Complaint. However, for purposes of ease of management and conservation of judicial time and effort, joining all of these issues in one action is preferable.

6. Although Ordinance 788, the subject of the original Complaint, has been repealed, the application submitted by plaintiffs was processed pursuant to that Ordinance.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is wilfully false, I am subject to punishment.


WAYNE J. PECK

Subscribed and sworn to before me this
25th day of October, 1985.



Karin A. Peck
A Notary Public of New Jersey
My Commission Expires
October 28, 1988