ML - Morris County Fast Hunsing Council V. Boonton Twp

Notice of Motion to intervene

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## FILED

JUN 16 1986

	PHEN SKILLMAN, J.S.C.
STEPHEN SKILLMAN,	
EINHORN, HARRIS & PLATT A Professional Corporation Broadway at Second Avenue P. O. Box .541 Denville, New Jersey 07834 (201) 627-7300 Attorneys for Defendants Sisters of the Sorrowful Mother Primary Care Corporation and Sisters of the Sorrowful Mother Senior Services Corporation	
MORRIS COUNTY FAIR HOUSING COUNCIL, ) et als.,	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MIDDLESEX/ MORRIS COUNTIES
Plaintiffs, ) vs. )	DOCKET NO. L-6001-78 P.W. (Denville Township) Civil Action
BOONTON TOWNSHIP, et als., ) Defendants. )	NOTICE OF MOTION TO INTERVENE
TO: HON. STETHEN SKILLMAN Superior Court of New Jersey Middlesex County Court House New Brunswick, New Jersey 08903	
STEPHEN HANSBURY, ESQ. HARPER & HANSBURY 736 Speedwell Avenue Morris Plains, New Jersey 07950	
DOUGLAS WOLFSON, ESQ. GREENBAUM, GREENBAUM, SMITH, BERGSTEIN, YOHALEN & BRUCK Englehard Building Box 5600 Woodbridge, New Jersey 07095	
ARTHUR PENN, ESQ. 10 Sylvan Way Parsippany, New Jersey 07054	

GULIET HIRSCH, ESQ. 2-4 Chambers Street Princeton, New Jersey 08540

BARNEY KATCHEN, ESQ. 345 Centre Street Nutley, New Jersey 07110

NICHOLAS CAPRIO, ESQ. HARKAVY, GOLDMAN, GOLDMAN & CAPRIO 667 Eagle Rock Avenue West Orange, New Jersey 07052

LEWIS GOLDSHORE, ESQ. GOLDSHORE & WOLF 407 West State Street Trenton, New Jersey 08618

EDWARD BOCCHER, ESQ. Deputy Attorney General Hughes Justice Complex CN 112 Trenton, New Jersey 08625

CLERK OF THE COURT Superior Court of New Jersey Law Division Richard J. Hughes Complex Trenton, New Jersey 08625

PLEASE TAKE NOTICE that the undersigned, attorneys for Sisters of the Sorrowful Mother Primary Care Corporation ("PCC") and Sisters of the Sorrowful Mother Senior Services Corporation ("SSC") will appear before the Honorable Stephen Skillman, on short notice as soon as counsel may be heard, at the Court House in New Brunswick, New Jersey for an Order granting PCC and SSC the right to intervene as defendants in the aforesaid action entitled "<u>Morris County Fair Housing Council</u> <u>et als. v. Boonton Township et als.</u>, Superior Court of New Jersey, Morris County/Middlesex County, Docket No. L-6001-78 P.W." pursuant to R. 4:33-1, or

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alternatively, R. 4:33-2, and to file objections to the proposed conditions upon transfer of the action to the Council on Affordable Housing.

Due to the nature of the action, a pleading would be inappropriate and therefore is not being submitted to the Court.

Defendants/Intervenors hereby request oral argument on all issues.

In support of this Motion, Defendants will rely upon the attached certified statement of Kenneth M. Courey and Brief.

EINHORN, HARRIS Bv Theodore Έ. Β. Einhorn

Dated: 6/9/86

## CERTIFICATION

The original of the within Notice of Motion has been filed with the Clerk of the Superior Court in Trenton.

Copies of the within Notice of Motion have been filed with the Clerk of Morris County in Morristown, New Jersey and the Clerk of Middlesex County in New Brunswick, New Jersey.

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EINHORN, HARRIS & PLATT By Theod Éinhorn

Dated: ( | 4 | 5 )