

RULS-AD-1976-170

9/14/1976

- NOTICE OF CROSS MOTION (ALLAN-DEANE)

PGS - 4

S-1290

The original of the within Notice of Motion has been filed with the Clerk of the Superior Court of New Jersey and a copy has been filed with the Clerk of Somerset County.

[Handwritten Signature]
Benjamin N. Cittadino

SEP 14 3 54 AM 1976

SOMERSET COUNTY
L.R. CLERK

MASON, GRIFFIN & PIERSON
201 NASSAU STREET
PRINCETON, N. J. 08540
(609) 921-6543
ATTORNEYS FOR Plaintiff

ent'd I. C. D. _____
Recorded Bk. _____ Page _____

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - SOMERSET COUNTY
DOCKET NO. L-25645-75 P.W.

X

THE ALLAN-DEANE CORPORATION, a Delaware corporation, qualified to do business in the State of New Jersey,	:	RULS - AD - 1976 - 170
	:	
	:	Civil Action
	:	
Plaintiff,	:	NOTICE OF
	:	CROSS-MOTION
vs.	:	
	:	
THE TOWNSHIP OF BERNARDS, IN THE COUNTY OF SOMERSET, et al.,	:	
	:	
Defendants.	:	
	:	

TO: McCARTER & ENGLISH, ESQS.
550 Broad Street
Newark, New Jersey 07102
Attorneys for Defendants,
The Township of Bernards, et al.

SIRS:

PLEASE TAKE NOTICE, that on the 17th day of September, 1976, at 9:00 o'clock in the forenoon or as soon thereafter as

counsel may be heard, the undersigned, attorneys for Plaintiff, Allan-Deane Corporation, will apply to the Superior Court, Law Division, Somerset County, at the Court House, Somerville, New Jersey, for an Order requiring Defendants to pay to Plaintiff his reasonable expenses incurred in opposing the Motion to Determine the Sufficiency of Plaintiff's Answers or Objections to Defendant's First Request for Admissions, including attorneys fees, pursuant to R. 4:23-1 (c) in that the making of the Motion was substantially unjustified. Reliance for this Motion will be placed upon the Brief in Opposition to Defendant's Motion to Determine the Sufficiency of Plaintiff's Answers or Objections to Defendant's First Request for Admissions submitted herewith.

MASON, GRIFFIN & PIERSON
Attorneys for Plaintiff, The
Allan-Deane Corporation

By: _____

Henry A. Hill, Jr.
Henry A. Hill, Jr.
A Member of the Firm

Attorney(s): MASON, GRIFFIN & PIERSON
Office Address & Tel. No.: 201 Nassau Street, Princeton, New Jersey 08540
(609) 921-6543
Attorney(s) for Plaintiff

THE ALLAN-DEANE CORPORATION,
a Delaware corporation, qualified to do
business in New Jersey, Plaintiff(s)

vs.

THE TOWNSHIP OF BERNARDS, IN THE
COUNTY OF SOMERSET, et al.,

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - SOMERSET COUNTY

Docket No. L-25645-75 P. W.

CIVIL ACTION

PROOF OF MAILING

1. I, the undersigned, am employed by the firm of Mason, Griffin & Pierson,
attorney(s) for Plaintiff

in the above entitled action.

2. On September 13, 19 76, I mailed in the U.S. Post Office in Princeton,
New Jersey, a sealed envelope with postage prepaid thereon, by regular mail, return receipt
requested, addressed to McCarter and English, Esqs., and John F. Richardson, Esq.,
at said addressee's last known address at 550 Broad Street, Newark, New Jersey, 07102 and
One East High Street, Somerville, New Jersey, 08876, respectively,
containing a copy of Notice of Cross-Motion and Plaintiff's Brief

~~and obtained a receipt of such mailing, which is attached to the original herof.~~

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

Dated: September 13 19 76 .


Lizbeth Swisher

MASON, GRIFFIN & PIERSON
COUNSELLORS AT LAW

P. O. BOX 391
201 NASSAU STREET
PRINCETON, NEW JERSEY
08540

RALPH S. MASON
GORDON D. GRIFFIN
ESTER R. PIERSON
RUSSELL W. ANNICH, JR.
HENRY A. HILL, JR.
JOHN A. HARTMANN, III
G. THOMAS REYNOLDS, JR.
JOHN A. MCKINNEY, JR.
RICHARD M. ALTMAN
CRAIG H. DAVIS
BARBARA ULRICHSEN
BENJAMIN N. CITTADINO

September 13, 1976

TELEPHONE
921-6543
587-2224
AREA CODE 609

Superior Court of New Jersey
Law Division
State House Annex
Trenton, New Jersey 08625

Re: Allan-Deane Corp. v. Township of Bernards, et al.
Docket No. L-25645-75 P.W.

Dear Sir:

Enclosed herewith please find an original and 1 copy of documents listed below:

- | | |
|---|--|
| <input type="checkbox"/> Summons | <input type="checkbox"/> Notice pursuant to R. 4:42-1(b) |
| <input type="checkbox"/> Complaint | <input type="checkbox"/> & Order |
| <input type="checkbox"/> Answer | <input type="checkbox"/> Order dated |
| <input type="checkbox"/> Interrogatories | <input type="checkbox"/> Request to Enter Default & |
| <input type="checkbox"/> Answers to Interrogatories | <input type="checkbox"/> Certification |
| <input type="checkbox"/> Notice to Take Oral Depositions | <input type="checkbox"/> Stipulation of Dismissal |
| <input type="checkbox"/> Notice of Motion & Affidavits | <input type="checkbox"/> Judgment |
| <input checked="" type="checkbox"/> Other: Notice of Cross-Motion | |

Will you please:

- File.
- File and charge our account.
- File and return conformed copy.
- File and list for argument on the date listed in the notice.
- Serve.
- Sign and return to us for filing.
- Return original Acknowledgment of Service.
- Other:

Also enclosed herewith please find our check in the amount of \$

Very truly yours,
MASON, GRIFFIN & PIERSON

Original signed by
Benjamin N. Cittadino
By Benjamin N. Cittadino

bs

Encls.

cc: Somerset County Clerk w/c of Brief ✓
John F. Richardson, Esq. w/c of Brief
McCarter and English, Esqs. w/c of Brief