

~~CA~~ - general
AF

8/13/86

Certification of Barbara Stark,
attorney for state of NJ +
Staff attorney w/ Constitutional
Litigation Clinic, Rutgers Law School
+ invoices attached

pg 39

submitted in support of UK II's
application for experts' fees + costs

AF 000093Z

JOHN M. PAYNE, ESQ.
 ERIC NEISSER, ESQ.
 BARBARA STARK, ESQ.
 Constitutional Litigation Clinic
 Rutgers Law School
 15 Washington Street
 Newark, New Jersey 07102
 201-648-5687

ATTORNEYS FOR URBAN LEAGUE PLAINTIFFS
 On Behalf of the American Civil Liberties Union
 of New Jersey

SUPERIOR COURT OF NEW JERSEY
 CHANCERY DIVISION
 MIDDLESEX/OCEAN COUNTY

URBAN LEAGUE OF GREATER
 NEW BRUNSWICK, et al.,

Plaintiffs,

vs.

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

Defendants.

Civil No. C 4122-73
 (Mount Laurel)

Certification of
 Barbara Stark

Barbara Stark, of full age, certifies as follows:

1. I am an attorney at law of the state of New Jersey and a staff attorney with the Constitutional Litigation Clinic, Rutgers Law School. John Payne, Esq., Eric Neisser, Esq. and I are co-counsel for the Urban League plaintiffs in this matter and in this capacity I am fully familiar with the facts and circumstances of this case. This certification is submitted in support of the Urban League plaintiffs' application for experts' fees and costs. As set forth in plaintiffs' motion papers, a separate Affidavit of Services with regard to attorneys' fees shall be submitted following

the determination of the instant motion. Supplemental affidavits with regard to costs and experts shall also be submitted at that time, if appropriate.

2. A Revised Statement for Professional Services dated May 12, 1984 from Carla Lerman to "All Counsel", is annexed as Exhibit A. Attached thereto is Ms. Lerman's Statement dated April 18, 1984 in which she sets forth a detailed account of the time spent by her in connection with this matter for the period from August 1, 1984 through March 31, 1984. According to this statement, Ms. Lerman's fee for these services was \$20,440. Pursuant to the instructions of the Honorable Eugene D. Serpentelli, Ms. Lerman billed the parties equally, without prejudice. The Urban League paid Ms. Lerman \$1572, as requested. For the reasons set forth in the memorandum of law submitted herewith, it is respectfully submitted that defendant municipalities Cranbury, East Brunswick, Monroe, North Brunswick, Old Bridge, Piscataway, Plainsboro, South Brunswick, and South Plainfield should reimburse the Urban League, each paying \$174.67.

3. An additional Statement for Professional Services dated May 12, 1984 from Ms. Lerman, regarding services rendered in connection with Old Bridge and North Brunswick, is annexed as Exhibit B. The Urban League paid \$87.50 in connection with this bill and should be reimbursed by Old Bridge and North Brunswick in the amount of \$43.75 each.

4. By letter dated September 27, 1984, annexed as Exhibit C,

Ms. Lerman requested an additional \$180.80 from the Urban League for attendance and testifying at trial. This was paid on November 20, 1984. It is respectfully submitted that defendant municipalities Cranbury, East Brunswick, Monroe, North Brunswick, Old Bridge, Piscataway, Plainsboro, South Brunswick, and South Plainfield should reimburse the Urban League, each paying \$20.01.

5. Invoices dated April 11, April 26 and May 18, 1984 of plaintiffs' expert Rogers, Golden & Halpern, in a total amount of \$5006, are annexed as Exhibit D. As set forth in the invoices, these services were rendered in connection with Piscataway and South Plainfield. It is respectfully submitted, therefore, that each of these municipalities should pay the Urban League the sum of \$2503.

6. Itemized statements of plaintiffs' expert planner, Alan Mallach, are annexed as Exhibit E. It should be noted that the hourly rate charged by Mr. Mallach in connection with this matter was well below his usual hourly rate. The dates and amounts of these invoices are as follows:

| | |
|------------------------|-----------|
| August 11, 1983..... | \$1000. |
| October 5, 1983..... | \$1325 |
| December 23, 1983..... | \$2562.50 |
| February 27, 1984..... | \$3337.50 |
| April 1, 1984..... | \$2612.50 |
| May 4, 1984..... | \$3550. |
| June 22, 1984..... | \$3762.50 |

August 6, 1986.....\$18,845

Total \$36,995

It is respectfully submitted that defendant municipalities Cranbury, East Brunswick, Monroe, North Brunswick, Old Bridge, Piscataway, Plainsboro, South Brunswick, and South Plainfield should reimburse the Urban League, each paying \$4110.56.

7. Invoices in connection with depositions are annexed as Exhibit F. To summarize:

| <u>Municipality</u> | <u>Date</u> | <u>Deponent</u> | <u>Cost</u> |
|---------------------|-------------|-------------------|-----------------|
| Cranbury | 2/28/84 | Richard A. Ginman | \$ 264.00 |
| | 3/26/84 | Thomas March | 274.75 |
| | 3/27/84 | G. Raymond | 272.50 |
| South Plainfield | 3/21/84 | James Higgins | 541.25 |
| | | John Graf | |
| | | Joseph E. Rosa | |
| Piscataway | 3/21/84 | Lester Nebenzahl | 542.50 |
| | 3/23/84 | Lester Nebenzahl | 350.00 |
| Monroe | 3/22/84 | Peter Tolischus | 275.00 |
| South Brunswick | 3/28/84 | D. H. Engel | 527.50 |
| North Brunswick | 6/20/84 | Thomas A. Vigna | 403.00 |
| | | J. Paul Keller | |
| TOTAL | | | <hr/> \$3450.50 |

As set forth in the Memorandum of Law submitted herewith, these

depositions were necessitated by the persistent refusal of defendant municipalities to comply with the mandate of Mount Laurel I and Mount Laurel II. Accordingly, it is submitted that the defendants should reimburse the Urban League plaintiffs for the costs of such depositions as set forth above.

8. Pursuant to N.J.S.A. 2A:15-59 and N.J.S.A. 22A:2-9, defendants are responsible for costs as set forth in the cited sections. A supplemental statement of costs shall be sought from the Clerk following the determination of this motion.

9. A chart summarizing the foregoing and setting forth the amount owed the Urban League by each municipality is annexed as Exhibit G.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: *August 13, 1986*



Barbara Stark

CARLA L. LERMAN
413 W. ENGLEWOOD AVENUE
TEANECK, NEW JERSEY 07666

EXHIBIT A

rec'd 5/21

TO: ALL COUNSEL in Urban League v. Carteret and Consolidated Cases
FROM: Carla L. Lerman *CL*
DATE: May 12, 1984
RE: Revised Statement for Professional Services

On April 18, 1984, the enclosed statement was submitted to the parties designated in the first court order on this matter. Subsequently, Judge Serpentelli directed that this statement should be submitted to thirteen parties currently involved in the Mt. Laurel aspects of this case.

total for August 1, 1983 through March 31, 1984 was \$20,440. (292 hours).
amount billed equally to thirteen parties will be:

$$\$20,440 \div 13 = \$1572.31$$

AMOUNT DUE FROM EACH PARTY: \$1572.

If you have any questions regarding this statement, please let me know.
Thank you for your consideration in this matter.

encl.
cc: Hon. E.D. Serpentelli

EXHIBIT A

CARLA L. LERMAN
413 W. ENGLEWOOD AVENUE
TEANECK, NEW JERSEY 07666

April 18, 1984

Professional Planning Services for Urban League of
Greater New Brunswick v. Carteret et al.

Fair Share Report, November, 1983

Research on regional and local trends, statistical
analysis, report writing:

| | | | |
|------------------|----------|-------|----------|
| August 28, 1983 | 4 hours | | |
| " 30, 1983 | 4 hours | Total | 8 hours |
| Sept. 11, 1983 | 5 hours | | |
| " 17, 1983 | 5 hours | | |
| " 25, 1983 | 5 hours | Total | 15 hours |
| October 1, 1983 | 7 hours | | |
| " 3, 1983 | 7 hours | | |
| " 4, 1983 | 10 hours | | |
| " 15, 1983 | 6 hours | | |
| " 16, 1983 | 7 hours | | |
| " 17, 1983 | 8 hours | | |
| " 23, 1983 | 8 hours | | |
| " 25, 1983 | 7 hours | | |
| " 28, 1983 | 10 hours | | |
| " 29, 1983 | 8 hours | Total | 78 hours |
| November 4, 1983 | 10 hours | | |
| " 5, 1983 | 10 hours | | |
| " 6, 1983 | 10 hours | | |
| " 9, 1983 | 7 hours | | |
| " 11, 1983 | 9 hours | Total | 46 hours |

Total First Fair Share Report: 147 hours

Response to Judge Serpentelli's questions; preliminary
preparation of responses to counsels' questions, stopped
at Judge Serpentelli's direction

January 2, 1984 10 hours

January 21, 1984 6 hours

Case Management Conference: Ocean County Court House

January 24, 1984 7 hours

Preparation of revised Fair Share Report using Warren Twp.
methodology, as per Judge Serpentelli's direction

January 28, 1984 8 hours Total 31 hours

February 1, 1984 3 hours

February 5, 1984 5 hours

Meeting of Planners' Consensus Group

February 7, 1984 11 hours

CARLA L. LERMAN
413 W. ENGLEWOOD AVENUE
TEANECK, NEW JERSEY 07666

April 18, 1984

Professional Planning Services for Urban League of
Greater New Brunswick v. Carteret et al., p.2

Meeting of Planners' Consensus Group and preparation
of draft memo for Counsel and Planners

February 13, 1984 10 hours

Meeting with Planners and Counsel

February 14, 1984 6 hours

Preparation of revised Fair Share Report, based on
Consensus Methodology (March 7, 1984 Report)

February 19, 1984 8 hours

" 20, 1984 8 hours

" 25, 1984 10 hours Total 61 hours

March 1, 1984 5 hours

" 4, 1984 8 hours

Meeting of Planners' Consensus Group

March 2, 1984 9 hours

Meeting of Planners' Consensus Group subcommittee

March 8, 1984 5 hours

Memorandum on Median Income and revised Fair Shares

March 10, 1984 5 hours

" 12, 1984 5 hours

Pre-Trial, Ocean County Court House

March 16, 1984 4 hours

Preparation of revised Fair Share Report (April 2, 1984 Report)

March 24, 1984 8 hours

" 31, 1984 4 hours Total 53 hours

Total all revisions and new Fair Share Reports: 145 hours

Total August 1, 1983 through March 31, 1984:

292 hours : \$20,440.

Billed equally to plaintiffs and defendants

\$20,440. - 8 = \$2,555.

AMOUNT DUE FROM EACH PARTY: \$2,555.

CARLA L. LERMAN
413 W. ENGLEWOOD AVENUE
TEANECK, NEW JERSEY 07666

rec 0-117

TO: ALL COUNSEL in Urban League v. Carteret, specific to Old Bridge
and North Brunswick
FROM: Carla L. Lerman *CL*
DATE: May 12, 1984
RE: Fair Share Calculations for Old Bridge and North Brunswick Twps.

EXHIBIT B

Professional services:

Mt. Laurel Fair Share Analysis, Present and Prospective Need
Five hours \$350.

Billed equally to all parties:

$$\$350. \div 4 = \$87.50$$

Amount due \$87.50

Thank you for your consideration in this matter.

cc: Hon. E.D. Serpentelli
Michael Noto, Esq.
Henry A. Hill, Esq.
Leslie Lefkowitz, Esq.
Thomas Norman, Esq.
Eric Neisser, Esq.

EXHIBIT B

CARLA L. LERMAN
413 W. ENGLEWOOD AVENUE
TEANECK, NEW JERSEY 07666

September 27, 1984

John Payne, Esq.
Constitutional Litigation Clinic, Room 338
Rutgers Law School
15 Washington Street
Newark, New Jersey 07102

Re: Urban League of Greater New Brunswick v. Carteret, et al

Dear Mr. Payne,

I am submitting as follows my statement for professional services performed in the trial of Urban League of Greater New Brunswick v. Carteret et al.

April 16 and 30, 1984
May 3 and 9, 1984

Attendance and testifying at trial:

31 hours \$2170.

Billed equally to twelve parties:

$\$2170. \div 12$ \$180.80 ✓

As in the past, I appreciate your consideration in this matter.

Sincerely,



Carla L. Lerman

cc: Hon. Eugene D. Serpentelli, JSC

Prof. Services

Paid
11-20-84
CK 919
\$180.80

EXHIBIT C



DUPLICATE

Jeffrey E. Fogel, Director
American Civil Liberties Union
33 Walnut Street
Newark, NJ 07102

Invoice No: 192-02-02
Invoice Date: May 18, 1984
Period ended: May 11, 1984

For professional services rendered in connection with the analysis of land suitable for residential development in Piscataway and South Plainfield Townships, New Jersey. In particular, these services included a meeting and discussions with Mr. Bruce Gelber and Mr. Alan Mallach concerning traffic conditions in Piscataway Township and preparation for upcoming court testimony.

Total This Invoice

\$506

cc: Bruce S. Gelber
National Committee Against
Discrimination in Housing

EXHIBIT D

RG&H

RECEIVED APR 15 1984

Jeffrey E. Fogel, Director
American Civil Liberties Union
38 Walnut Street
Newark, NJ 07102

Invoice No: 192-01-01
Invoice Date: April 11, 1984
Period ended March 20, 1984

For professional services rendered in connection with the analysis of land suitable for residential development in Piscataway and South Plainfield Townships, New Jersey. The analysis included a review of air photos, soil maps, and flood maps.

Total Amount Due \$2,500

Urban League v Carter

Paid 4-23-84
CK# 201289

cc: Bruce S. Gelber
National Committee Against
Discrimination in Housing

RG&H

Jeffrey E. Fogel, Director
American Civil Liberties Union
38 Walnut Street
Newark, NJ 07102

Invoice No. 192-02-01
Invoice Date: April 26, 1984
Period ended April 20, 1984

For professional services rendered in connection with the analysis of land suitable for residential development in Piscataway and South Plainfield Townships, New Jersey. These services included the following completed tasks

- 1) Analyzed environmental factors associated with specific sites identified by Mr. Gelber.
- 2) Compared computer listing of property parcel with Piscataway's vacant lands list.
- 3) Identified parcels of five or more acres not on Piscataway's vacant lands list.
- 4) Reviewed seven parcels for ownership and inclusion within the computer's and Piscataway's vacant lands list.
- 5) Site visits in South Plainfield and Piscataway Townships.
- 6) Analyzed traffic conditions in Piscataway.

Total This Invoice

\$2,000

cc: Bruce S. Gelber
National Committee Against
Discrimination in Housing

Paid 5-14-84
ck# 201324

Alan Mallach, AICP
15 Pine Drive Roosevelt New Jersey 08555

609-448-5474

Barbara Stark, Esq.
Constitutional Litigation Clinic
Rutgers University Law School
15 Washington Street
Newark, New Jersey

STATEMENT

For professional services rendered in connection with Urban League
v. Borough of Carteret from June 25, 1984 through August 5, 1986

| | | |
|---------------------|-------------------------|-----------------|
| 6/25/84 to 12/31/84 | 110.0 hours @ \$50/hour | \$ 5,500.00 |
| 1/1/85 to 12/31/85 | 197.5 hours @ \$60/hour | 11,850.00 |
| 1/1/86 to 8/5/86 | 23.0 hours @ \$65/hour | <u>1,495.00</u> |
| TOTAL DUE | | \$18,845.00 |


Alan Mallach, AICP

August 6, 1986

EXHIBIT E

EXHIBIT E

Alan Mallach
15 Pine Drive
Roosevelt NJ 08555

Jeffrey Fogel, Esq.
ACLU of New Jersey
38 Walnut Street
Newark, N.J. 07102

STATEMENT

For professional services rendered in Urban League of Greater
New Brunswick v. Borough of Carteret from May 4, 1984 through
June 22, 1984

75.25 hours at \$50 per hour

\$3,762.50


Alan Mallach

June 24, 1984

Alan Mallach

Itemization of professional services in Urban League of Greater
New Brunswick v. Carteret from May 4, 1984 through June 22, 1984

| | | |
|-------------|---|-------|
| 5/4 | Site visit and settlement meeting with South Plainfield | 2.5 |
| 5/7 | Trial appearance, work session with attorneys | 9.5 |
| 5/8 | Trial appearance | 7.5 |
| 5/9 | T/C Barcan, Neisser, Gelber. Prepare Piscataway settlement proposal | 2.0 |
| 5/10 | Prepare Piscataway materials | 0.25 |
| 5/11 | T/C Neisser, Gelber, LaBella, fair share for Old Bridge, No. Brunswick, affordability table | 2.0 |
| 5/13 | Edison fair share, T/C LaBella | 1.0 |
| 5/16 | South Plainfield and Plainsboro settlements, Monroe materials | 6.0 |
| 5/18 | T/C Payne, LaBella, affordability numbers | 1.0 |
| 5/21 | Meeting with Neisser | 1.5 |
| 5/22 | Plainsboro press conference | 1.25 |
| 5/23 | T/C Neisser, T/C Gelber, prepare Piscataway affidavit | 3.0 |
| 5/24 | T/C Gelber | 1.25 |
| 5/25 | T/C Herbert, T/C Gelber, Payne, LaBella, T/C Gelber, Payne | 1.75 |
| 5/28 | Prepare Piscataway materials | 1.0 |
| 5/29 | Trial appearance | 6.25 |
| 5/30 | Trial appearance, prepare Piscataway materials | 8.0 |
| 5/31 | Trial appearance, T/C Lerman | 6.0 |
| 6/11 | T/C Gelber | 0.75 |
| 6/13 | Conf. call Gelber et al, T/C Gelber | 1.5 |
| 6/14 | Site visit North Brunswick & Old Bridge, review with attorneys | 8.0 |
| 6/15 | T/C Gelber | 0.5 |
| 6/19 | T/C Lerman | 1.5 |
| 6/20 | T/C Gelber, South Brunswick affordability table | 1.0 |
| 6/21 | T/C Gelber | 0.25 |
| TOTAL HOURS | | 75.25 |

Alan Mallach 15 Pine Drive Roosevelt New Jersey 08555

May 4, 1984

Jeffrey Fogel, Esq.
Executive Director
ACLU of New Jersey
38 Walnut Street
Newark, N.J. 07102

STATEMENT

For professional services as itemized in Urban League of Greater New Brunswick v. Borough of Carteret et al from April 1 through May 3, 1984

71.0 hours @ \$50 per hour

\$3550.00


Alan Mallach

May 4, 1984

Paid 5/15/84
ch# 201328

Alan Mallach

Itemization of professional services in Urban League of Greater
New Brunswick v. Borough of Carteret from April 1, 1984 through
May 3, 1984

| | | |
|-------------|---|-------------|
| 4/2 | TC Gelber, TC Kurtz, TC LaBella/Gelber, TC Neisser TC Gelber, review Piscataway/South Plainfield data send map to Kurtz | 3.25 |
| 4/3 | TC LaBella, TC Gelber | 0.5 |
| 4/4 | TC Gelber | 0.25 |
| 4/5 | Meeting with Gelber/LaBella | 1.5 |
| 4/6 | Settlement meeting with East Brunswick, work session with attorneys | 4.5 |
| 4/9 | TC Neisser | 0.75 |
| 4/11 | TC Neisser | 0.25 |
| 4/12 | TC Neisser | 0.25 |
| 4/13 | TC LaBella (2) | 0.75 |
| 4/15 | Work session with attorneys | 6.25 |
| 4/16 | East Brunswick settlement in court | 5.5 |
| 4/17 | Research, prepare Piscataway affidavit | 1.5 |
| 4/19 | Analyze mobile home ordinance | 0.5 |
| 4/20 | Draft mobile home ordinance | 1.0 |
| 4/22 | continue drafting mobile home ordinance | 1.0 |
| 4/23 | Work session with attorneys @ Rutgers Revise fair share data | 8.25 2.5 |
| 4/24 | Meeting with Gelber, meeting with Kurtz re traffic | 5.5 |
| 4/25 | TC Gelber | 0.5 |
| 4/26 | TC LaBella | 0.5 |
| 4/27 | TC Gelber/LaBella | 1.5 |
| 4/30 | In court/trial, prepare revised affidavit | 8.5 |
| 5/1 | finish affidavit, meeting with Gelber/LaBella, work session with attorneys, prepare materials for trial | 7.0 |
| 5/2 | in court/trial testimony | 7.5 |
| 5/3 | TC Gelber, TC Neisser, TC Payne (2), revised Plainsboro numbers | 1.5 |
| TOTAL HOURS | | 71.0 |

RECEIVED APR 09 1984

Alan Mallach 15 Pine Drive Roosevelt New Jersey 08555

Jeffrey Fogel, Esq.
Executive Director
ACLU of New Jersey
38 Walnut Street
Newark, N.J. 07102

STATEMENT

For professional services rendered in Urban League v. Borough of Carteret et al. for March 1984

52.25 hours @ \$50 per hour

\$2,612.50

Paid 4/10/84
ck# 201274



Alan Mallach

April 1, 1984

609 . 448 . 5474

Alan Mallach

Itemization of services for Urban League v. Borough of Carteret et al for March 1984

| | | |
|------|--|-------|
| 3/1 | Telephone conversation (T/C) Neisser (2) | 0.5 |
| 3/2 | Planners meeting re fair share issues at Ocean County Courthouse | 6.5 |
| 3/5 | T/C Neisser | 0.75 |
| 3/7 | South Plainfield settlement meeting and site visit | 3.75 |
| 3/8 | Fair share calculations for North Brunswick and Old Bridge | 1.0 |
| 3/9 | T/C Lynch (fair share), T/C Lerman, T/C Meiser, T/C Liss (Clinic), work on Piscataway interrogatories | 2.0 |
| 3/10 | T/C Lerman | 0.5 |
| 3/11 | T/C Lynch | 0.25 |
| 3/12 | T/C Hintz, T/C Lerman, T/C Gelber | 1.0 |
| 3/14 | T/C Gelber | 0.5 |
| 3/15 | T/C Gelber, LaBella, Neisser | 1.5 |
| 3/16 | T/C Neisser | 0.75 |
| 3/19 | T/C Barkan re East Brunswick, T/C LaBella, rental affordability analysis, Cranbury site visit | 1.75 |
| 3/20 | Meeting with Rogers and Deis re site evaluations, review with Gelber and Neisser | 4.5 |
| 3/23 | South Plainfield site visit, meeting with Deignan, review with Kennedy and Neisser, settlement meeting in Plainsboro | 9.5 |
| 3/24 | Review Plainsboro rental information | 1.0 |
| 3/25 | Review South Plainfield sites, T/C Gelber (2) | 1.5 |
| 3/26 | T/C Neisser (2) | 0.75 |
| 3/27 | T/C Gelber | 0.25 |
| 3/29 | T/C Gelber (2), Conf. call, memo on Plainsboro settlement, East Brunswick affordability analysis | 4.75 |
| 3/30 | Piscataway site visits with Gelber, review Piscataway data | 9.0 |
| 3/31 | Review Piscataway data | 0.25 |
| | | 52.25 |

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204

Alan Mallach 15 Pine Drive Roosevelt New Jersey 08555

Jeffrey Fogel, Esq.
Executive Director
ACLU of New Jersey
38 Walnut Street
Newark, N.J. 07102

STATEMENT

For professional services rendered in Urban League v. Borough of
Carteret et al. for January and February 1984

66.75 hours @ \$50/hour

\$3337.50

Paid 3-15-84
cl# 201243


Alan Mallach

February 27, 1984

609 · 448 · 5474

Alan Mallach

Itemization of services in Urban League litigation for January and February 1984

| | | |
|------|---|-----------|
| 1/4 | T/C Gelber | 0.5 hours |
| 1/5 | T/C LaBella (2) | 0.5 |
| 1/9 | Rev. Piscataway ordinance, T/C Payne | 0.5 |
| 1/13 | Conf. call with NCDH and Rutgers attorneys | 2.25 |
| 1/6 | Review East Brunswick materials, meeting with attorneys, site visit to E. Brunswick, settlement conference, and post-conference discussion with attorneys | 6.25 |
| 1/19 | T/C Gelber, T/C Payne | 0.5 |
| 1/20 | T/C Gelber, T/C LaBella | 0.75 |
| 1/23 | Plainsboro settlement conference | 2.75 |
| 1/24 | Case management meeting in court/Toms River, meeting with attorneys | 5.5 |
| 1/30 | T/C Gelber, T/C LaBella | 0.5 |
| 1/31 | T/C LaBella, South Brunswick site visit | 1.25 |
| 2/1 | South Brunswick site visit, settlement meeting | 4.75 |
| 2/2 | Meeting with attorneys, meeting with client | 4.0 |
| 2/6 | Review fair share issues, conf. call with attorneys, analyze E. Brunswick mobile home zone T/C Caton re fair share issues | 3.0 |
| 2/7 | Planners meeting (1) in Toms River, meeting with Payne and Neisser in Montclair | 11.0 |
| 2/8 | Median income analysis, memo on median income levels, memo on Plainsboro proposal | 2.5 |
| 2/13 | Planners meeting (2) in Toms River, meeting with Gelber & LaBella, T/C Neisser & Payne | 10.75 |
| 2/14 | Presentation to attorneys in Toms River | 2.5 |
| 2/15 | T/C Gelber | 0.75 |
| 2/20 | T/C Gelber | 0.25 |
| 2/21 | Site visit to Piscataway, settlement meeting | 4.75 |
| 2/22 | T/C Nikolaides | 0.25 |
| 2/24 | T/C Nikolaides, T/C Gelber, prepare materials for Piscataway interrogatories | 1.0 |
| | TOTAL | 66.75 |

Alan Mallach 15 Pine Drive Roosevelt New Jersey 08555

Jeffrey Fogel, Esq.
Executive Director
ACLU of New Jersey
38 Walnut Street
Newark, New Jersey 07102

RECEIVED DEC 2 1983

STATEMENT

For professional services rendered in connection with Urban League of Greater New Brunswick v. Borough of Carteret et al from October 5, 1983 through December 22, 1983

51.25 hours @ \$50/hour

\$2562.50



Alan Mallach

December 23, 1983

Paid 12/29/83
cl # 201138

Alan Mallach

Itemization of professional services for Carteret litigation

| | | |
|-------|---|-------|
| 10/5 | T/C Gelber, review fair share materials | 1.25 |
| 10/9 | prepare alternative 3 county fair share analysis | 2.00 |
| 10/11 | visit State Data Center | 1.00 |
| 10/13 | T/C Gelber | 0.50 |
| 10/25 | T/C ConLit Clinic | 0.25 |
| 10/26 | T/C ConLit Clinic | 0.25 |
| 10/28 | review interrogatories, T/C Neisser | 1.50 |
| 11/2 | T/C Payne, T/C Gelber & LaBella | 0.75 |
| 11/3 | Review South Brunswick ordinance, T/C Gelber | 2.00 |
| 11/9 | T/C Payne | 0.25 |
| 11/10 | T/C Johnson, review fair share plan | 3.25 |
| 11/11 | revise fair share plan, letter to Gelber | 2.75 |
| 11/17 | T/C Gelber (2) | 0.75 |
| 11/18 | Case management conference in Toms River and post-conference meeting with Gelber, LaBella & Neisser | 8.00 |
| 11/20 | prepare expert report | 7.00 |
| 11/21 | finish report, T/C Gelber, settlement conference with Cranbury | 4.50 |
| 11/23 | T/C Gelber (2) | 1.50 |
| 11/27 | revise expert report | 3.50 |
| 11/28 | revise report, T/C Gelber | 1.75 |
| 12/5 | T/C LaBella, revise materials, prepare appendices on Plainsboro & Cranbury | 2.50 |
| 12/8 | T/C LaBella | 0.25 |
| 12/14 | T/C LaBella | 0.25 |
| 12/19 | T/C Gelber | 0.50 |
| 12/20 | T/C Gelber, T/C Neisser, T/C ConLit prepare reports on Old Bridge and North Brunswick | 4.25 |
| 12/21 | T/C Neisser, letter on Old Bridge and North Brunswick fair share | 0.75 |
| | | 51.25 |

Alan Mallach
27 W Patcong Ave
Linwood NJ 08221

RECEIVED OCT 12 1983

Jeffrey Fogel, Esq.
Executive Director
ACLU of New Jersey
45 Academy Street
Newark, N.J. 07102

STATEMENT

For professional services rendered as per attached itemization
in matter of Urban League of New Brunswick v. Borough of
Carteret et al. through October 4, 1983

| | |
|---|-------------------|
| 46.5 hours @ \$50 per hour | \$2,325.00 |
| less amount received from National Committee against Discrimination in Housing | <u>(1,000.00)</u> |
| BALANCE DUE | \$1,325.00 |


Alan Mallach

October 5, 1983

Paid 10/26/83
CK # 201068

Alan Mallach
27 W Patcong Ave
Linwood NJ 08221

Itemization of costs incurred in providing professional services
to Urban League v. Carteret et al through October 5, 1983

| DATE | NATURE OF ACTIVITY | HOURS |
|------|--|-------|
| 6/7 | telephone conversation (TC) Gelber | 0.50 |
| 7/19 | TC Gelber | 1.50 |
| 8/9 | review documents (East Brunswick) | 0.25 |
| 8/11 | TC Gelber | 1.25 |
| 8/16 | review Piscataway materials, TC Gelber | 0.75 |
| 8/19 | TC Gelber | 0.25 |
| 8/22 | Meeting with Korman, meeting with Fogel/Gelber | 6.25 |
| 8/25 | review East Brunswick, Cranbury, Piscataway materials, TC Gelber | 1.75 |
| 8/26 | Meeting in Washington with Gelber & LaBella | 8.50 |
| 8/27 | Prepare fair share report | 4.25 |
| 8/29 | Cont. | 4.75 |
| 9/2 | TC Gelber/LaBella | 2.00 |
| 9/19 | TC Gelber | 1.00 |
| 9/23 | review materials, TC Gelber/LaBella | 2.75 |
| 9/26 | TC Gelber | 0.25 |
| 9/28 | review Plainsboro materials | 0.50 |
| 10/3 | meeting at Newark/Rutgers Law School | 7.50 |
| 10/4 | meeting with Carla Lerman | 2.50 |
| | TOTAL HOURS | 46.50 |



Alan Mallach

Alan Mallach
27 W Patcong Ave
Linwood NJ 08221

Bruce S. Gelber, Esq.
General Counsel
National Committee against
Discrimination in Housing
1425 H Street, N.W.
Washington, D.C. 20005

STATEMENT

For professional services in connection with Urban League of
Greater New Brunswick et al. v. Borough of Carteret et al.
to be provided at hourly rate of \$50 per hour.

Retainer (for initial 20 hours at hourly rate) \$1,000.00


Alan Mallach

August 11, 1983

URBAN LEAGUE V. CRANBURY

JOHN PAYNE, ESQUIRE
Constitutional Law Clinic
Rutgers Law School
15 Washington Street
Newark, New Jersey 07102

RICHARD C. GUINTA
CERTIFIED SHORTHAND REPORTER
METUCHEN PROFESSIONAL BUILDING
406 MAIN STREET
METUCHEN, NEW JERSEY 08840
(201) 548-2880

April 10, 1984

For one copy of the depositions taken March 26, 1984,
of witness Thomas March, your examination:

8 pages @ \$2.75 22.00

For one copy of the balance of the deposition:

143 pages @ \$1.75 250.25

Postage

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EXHIBIT F

*Paid by us
4/12/84
OK # 868
and billed ACLU
& they pd us.*

URBAN LEAGUE V. CRANBURY

RICHARD C. GUINTA
CERTIFIED SHORTHAND REPORTER
METUCHEN PROFESSIONAL BUILDING
406 MAIN STREET
METUCHEN, NEW JERSEY 08840
(201) 548-2880

JOHN PAYNE, ESQUIRE
Constitutional Law Clinic
Rutgers Law School
15 Washington Street
Newark, New Jersey 07102

April 16, 1984

For one copy of depositions taken in the above
on March 27, 1984, of witness G. Raymond, your
direct examination:

13 pages @ \$2.75 35.75

One copy of the balance of the deposition:

134 pages @ \$1.75 234.50

Postage 2.25
\$ 272.50

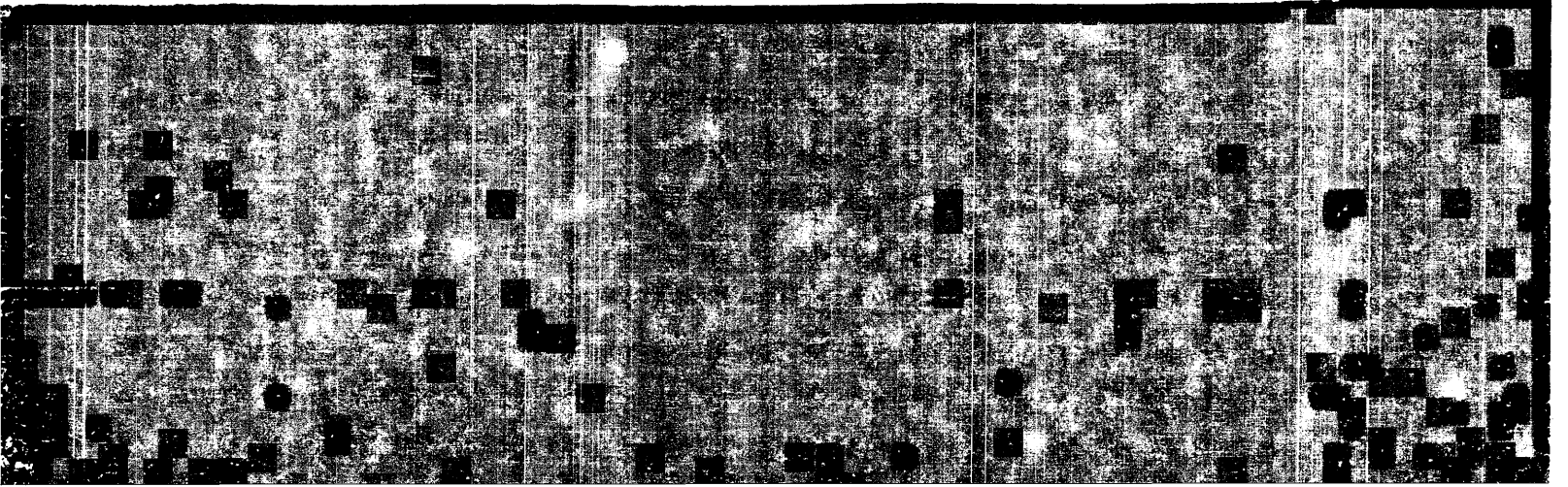
Pls note!
sent to
acc u
for print

Mr. Fogel --
PLEASE NOTE:
4/18/84

Pls pay this bill.
Thanxx

Eliz Urbanowicz
Rutgers University-School of Law
CONSTITUTIONAL LITIGATION CLINIC
15 Washington Street
Newark, New Jersey 07102

rg



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Reply to: *[Signature]*

INVOICE NUMBER

55958

PLEASE REFER TO THE ABOVE NUMBER IN ALL CORRESPONDENCE REGARDING THIS INVOICE.

Urban League of New Brunswick
vs.
Mayor and Council of Carteret

DATE March 28, 1984

REPORTER J. Gill

1010123

American Civil Liberties Union
38 Walnut Street
Newark, N.J.

Charles Darrow & Associates
Certified Shorthand Reporters

3 Tornill Road
West Orange, N.J. 07052
(201) 731-4628
22-2109452

| DATE | DESCRIPTION OF SERVICES | CHARGES |
|---------|---|---|
| 3/21/84 | <p>ATTENDANCE AT: Joseph E. Rosa</p> <p>TRANSCRIPT: orig. & 2 copies 135 pages @\$3.75(EXPEDITED)</p> <p>DISTRIBUTION OF TRANSCRIPT: R E H orig., & 1 copy to Eric Neisser for dep. of James Higgins, John Graf & Joseph E. Rosa The free copy of these witnesses goes to Patrick J. Diegnan, Jr., Esq.</p> | <p>\$ 35.00</p> <p><u>506.25</u></p> <p>\$541.25</p> |

ACCOUNTING COPY

Reply to: J

INVOICE NUMBER

55994

PLEASE REFER TO THE ABOVE NUMBER IN ALL CORRESPONDENCE REGARDING THIS INVOICE.

Urban League of New Brunswick
vs.
Mayor and Council of Carteret

DATE April 2, 1984

REPORTER M. Lukensow

1010123

American Civil Liberties Union
38 Walnut Street
Newark, N.J.

Charles Darrow & Associates
Certified Shorthand Reporters

3 Tornill Road
West Orange, N.J. 07052
(201) 731-4628
22-2109452

| DATE | DESCRIPTION OF SERVICES | CHARGES |
|---------|--|---------------------------|
| 3/21/84 | ATTENDANCE AT: Piscataway Municipal Building | \$ 35.00 |
| | TRANSCRIPT: orig. & 2 copies 134 pages @\$3.75(EXPEDITED) | 502.50 \$537.50 |
| | DISTRIBUTION OF TRANSCRIPT: orig. to Bruce Gelber free copy to Kirsten, Friedman & Cherin copy XXXXXXXX Brice Gelber for dep. of Lester Nebenzahn | P & H 5.00 \$542.50 |

DUPLICATE INVOICE

INVOICE NUMBER

56019

PLEASE REFER TO THE ABOVE NUMBER IN ALL CORRESPONDENCE REGARDING THIS INVOICE.

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DATE _____

REPORTER _____

Charles Darrow & Associates
Certified Shorthand Reporters

3 Tornill Road
West Orange, N.J. 07052
(201) 731-4828
22-2109452

| DATE | DESCRIPTION OF SERVICES | CHARGES |
|------|--|---------|
| | ATTENDANCE AT: | |
| | TRANSCRIPT: | |
| | DISTRIBUTION OF TRANSCRIPT: | |
| | <p style="text-align: right;"> <i>DN. 2-4-85</i> <i>cl# 201612</i> </p> | |

THE STATE UNIVERSITY OF NEW JERSEY
RUTGERS
Campus at Newark

School of Law-Newark • Constitutional Litigation Clinic
S.I. Newhouse Center For Law and Justice
15 Washington Street • Newark • New Jersey 07102 • 201/648-5687

S T A T E M E N T

April 12, 1984

Jeffrey Fogel, Esq.
American Civil Liberties Union of New Jersey
38 Walnut Street
Newark, New Jersey 07102

RECEIVED APR 15 1984

Re: Urban League v. Carteret, et al.

Deposition Transcript/
Witness Thomas March
3/26/84

\$274.75

Paid 4-23-84
cl# 201290

A review of our litigation expenses in the above captioned case indicates the items for which we are billing you.

Thank you for your prompt attention and please contact us concerning any problems or questions you may have.

Please make checks payable to the Constitutional Litigation Clinic, Rutgers Law School. Indicate case for which you are enclosing payment.

Carter

URBAN LEAGUE V. CRANBURY

RICHARD C. GUINTA
CERTIFIED SHORTHAND REPORTER
METUCHEN PROFESSIONAL BUILDING
406 MAIN STREET
METUCHEN, NEW JERSEY 09840
(201) 548-2880

JOHN PAYNE, ESQUIRE
Constitutional Law Clinic
Rutgers Law School
15 Washington Street
Newark, New Jersey 07102

April 16, 1984

For one copy of depositions taken in the above
on March 27, 1984, of witness G. Raymond, your
direct examination:

13 pages @ \$2.75 35.75

One copy of the balance of the deposition:

134 pages @ \$1.75 234.50

Postage 2.25
\$ 272.50

Mr. Fogel --
PLEASE NOTE

Pls pay this bill.
Thanx.

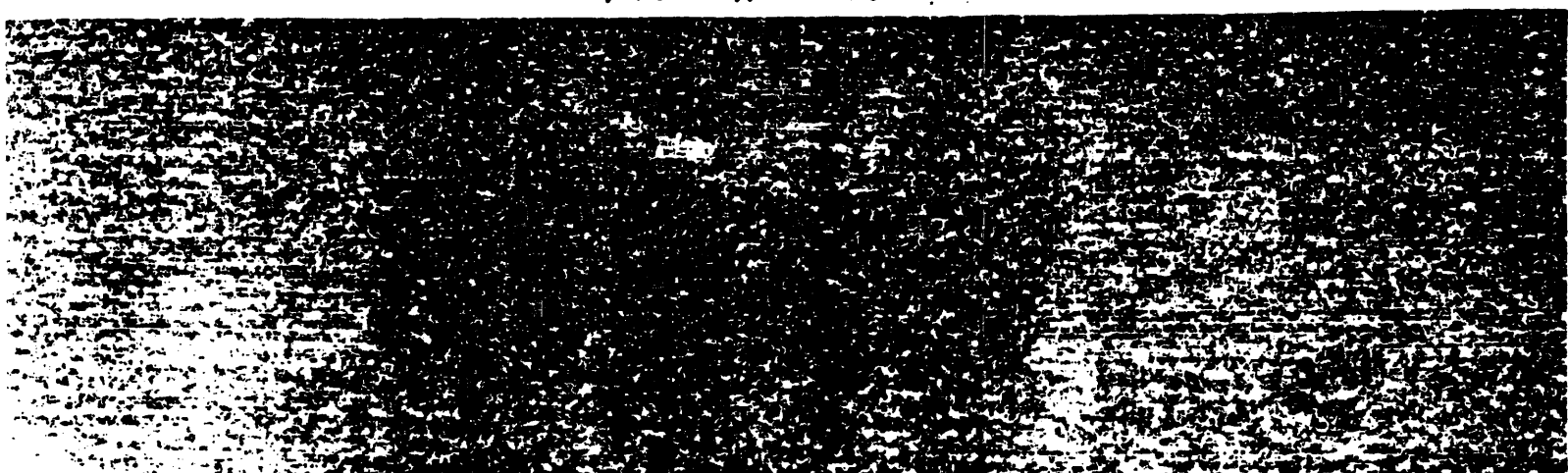
Eliz Urbanowicz

4/18/84

Rutgers University-School of Law
CONSTITUTIONAL LITIGATION CLINIC
15 Washington Street
Newark, New Jersey 07102

Paid 4-23-84
CK# 201291

rg





ROBERT J. CAGGIANO, C.S.R.
 CERTIFIED SHORTHAND REPORTERS
 999 RARITAN ROAD • POST OFFICE BOX 822
 CLARK, N.J. 07066
 499-0420-1
 ID #155-30-1210

No. 6797 KMA
 March 23, 1984

TO: Janet Labella, Esq.
 1425 H Street N.W.
 Suite 410
 Washington D.C. 20005

RE: Urban League Of Greater New Brunswick,
 et al.,

Plaintiffs,

-vs.-

Carteret, et al.,

Defendants.

Deposition taken at Trenton, N.J. on 2/28/84

Witness: Richard A. Ginman

Copy your office: 330 folios @ 80¢

\$264.00

*Sent to ACLU from
 Bruce Gelber*

enclosure as stated

*Paid 5-14-84
 Cl# 201325*

ORIGINAL INVOICE

RECEIVED APR 13 1984

| |
|--|
| <p>INVOICE NUMBER 56048 PLEASE REFER TO THE ABOVE NUMBER IN ALL CORRESPONDENCE REGARDING THIS INVOICE.</p> |
|--|

~~XXXX~~ Urban League of New Brunswick
 vs.
~~XXXX~~ Borough of Carteret

Reply to: _____

DATE April 9, 1984

REPORTER M. Lukensow

1010123

American Civil Liberties Union
 38 Walnut Street
 Newark, N.J.

Charles Darrow & Associates
 Certified Shorthand Reporters

3 Tornill Road
 West Orange, N.J. 07052
 (201) 731-4628
 22-2109452

| DATE | DESCRIPTION OF SERVICES | CHARGES |
|---------|---|----------------------------------|
| 3/28/84 | ATTENDANCE AT: South Brunswick Municipal Complex | \$ 35.00 |
| | TRANSCRIPT: orig. & 2 copies 130 pages @\$3.75(EXPEDITED) | 487.50 <u>\$522.50</u> |
| | DISTRIBUTION OF TRANSCRIPT: orig. to Janet Labella free copy to Benedict & Altman copy to Janet Labella - c/o John M. Payne, XXX Esq. | P & H 5.00 <u>\$527.50</u> |
| | | |
| | | |

pv. 5-21-85

DUPLICATE INVOICE

INVOICE NUMBER
56202
PLEASE REFER TO THE
ABOVE NUMBER IN ALL
CORRESPONDENCE
REGARDING THIS INVOICE.

Reply to: _____

DATE June 29, 1984

REPORTER N. Bouselli

[Faint, mostly illegible text, possibly a recipient address or company name]

Charles Darrow & Associates
Certified Shorthand Reporters
3 Tornill Road
West Orange, N.J. 07052
(201) 731-4628
22-2109452

| DATE | DESCRIPTION OF SERVICES | CHARGES |
|---------|---|-----------|
| | ATTENDANCE AT: | |
| 6/29/84 | In the office, 10:00 AM - 12:00 PM | \$ 35.00 |
| | TRANSCRIPT: [Faint text describing transcript services] | \$ 363.00 |
| | DISTRIBUTION OF TRANSCRIPT: | 5.00 |
| | [Faint text describing distribution of transcript] | \$ 403.00 |

DUPLICATE INVOICE

INVOICE NUMBER

5607E

PLEASE REFER TO THE ABOVE NUMBER IN ALL CORRESPONDENCE REGARDING THIS INVOICE.

Reply to: _____

Urban League of Greater New Brunswick
Mayor + Council of Carteret

DATE April 11, 1984

REPORTER N. Bousell

Charles Darrow & Associates
Certified Shorthand Reporters

3 Tornill Road
West Orange, N.J. 07052
(201) 731-4628
22-2109452

| DATE | DESCRIPTION OF SERVICES | CHARGES |
|------|-----------------------------|---------------|
| | ATTENDANCE AT: | |
| | TRANSCRIPT: | 35.00 |
| | DISTRIBUTION OF TRANSCRIPT: | 315.00 |
| | | <u>350.00</u> |

COSTS TO BE PAID BY DEFENDANT MUNICIPALITIES

| | <u>Depositions</u> | <u>Mallach</u> | <u>Lerman</u> | <u>Rogers</u> | <u>Costs*</u> | <u>Total</u> |
|---------------------|--------------------|----------------|--------------------------|---------------|---------------|-------------------|
| Cranbury | \$ 811.25 | \$4110.56 | \$174.67 20.01 | | 50. | 5166.49 |
| South Plainfield | 541.25 | 4110.56 | 174.67 20.01 | 2503. | 50. | 7399.49 |
| Piscataway | 892.50 | 4110.56 | 174.67 20.01 | 2503. | 50. | 7750.74 |
| Monroe | 275.00 | 4110.56 | 174.67 20.01 | | 50. | 4630.24 |
| South Brunswick | 527.50 | 4110.56 | 174.67 20.01 | | 40. | 4872.74 |
| North Brunswick | 403.00 | 4110.55 | 174.67 43.75 20.01 | | 50. | 4801.98 |
| East Brunswick | | 4110.55 | 174.67 20.01 | | 40. | 4345.23 |
| Old Bridge | | 4110.55 | 174.67 43.75 20.01 | | 40. | 4388.98 |
| Plainsboro | | 4110.55 | 174.67 20.01 | | 40. | 4345.23 |
| TOTALS | <u>3450.50</u> | <u>36995.</u> | <u>1839.62</u> | <u>5006.</u> | <u>410.</u> | <u>\$47701.12</u> |

* Pursuant to N.J.S.A. 22A:2-9, which provides in pertinent part:
For all proceedings down to and including final judgment when there has been a trial of an issue of fact, fifty dollars (\$50.00).

Upon the entry of judgment final, by default, or upon consent, stipulation, or admissions, or upon the pleadings, or by summary judgment or on dismissal, in all actions or proceedings, to the moving party, forty dollars (\$40.00).