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Certification of C. Roy Epps, President  
of the Civic League of Greater New  
Brunswick

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On Behalf of the ACLU of NJ

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
MIDDLESEX/OCEAN COUNTIES

URBAN LEAGUE OF GREATER ]  
NEW BRUNSWICK, et al., ]  
Plaintiffs, ]

Docket No. C 4122-73

vs. ]

Civil Action

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

CERTIFICATION OF C. ROY EPPS

C. Roy Epps, of full age, certifies as follows:

1. I am the President of the Civic League of Greater New Brunswick (the "Civic League"), plaintiff in the above-captioned matter. In this capacity I am fully familiar with the facts and circumstances of this case. I submit this Certification in support of the Civic League's application for counsel fees and costs.

2. The Civic League is a nonprofit corporation representing the interests of lower income households. We receive 75% of our program funding from the United Way and we attempt to obtain the remaining 25% from corporate

memberships and private contributions. All of these funds are program designated, which means that they may be used only for the specific program approved by the United Way. In addition, we receive funds from the Division for Youth and Family Services to be used solely for our Youth Development Program.

3. None of our funds may be used for any phase of this litigation, including attorneys' and experts' fees. We made a specific request for funds to assist us in our Mount Laurel monitoring efforts, which the United Way flatly refused.

4. The Civic League retains attorneys from time to time to represent us in closings and similar transactions in connection with our housing corporation. These attorneys are paid from rents received by the housing corporation, however, and they perform no other services for us. We have no attorneys on staff or on retainer. It would have been impossible for us to proceed without the assistance of the ACLU and the public interest lawyers who have represented us throughout this litigation.

5. Nor have we any funds with which to pay planners such as alan Mallach, our expert in this case. There can be no serious question that Mr. Mallach's services were essential to our success here.

6. The unprecedented victory won by the Civil League

and the other plaintiffs in this litigation has resulted in an entire new approach to affordable housing for lower income households not only in Middlesex County, but throughout the state. The cost has been astronomical. It is respectfully submitted that those towns whose exclusionary ordinances compelled this litigation should be held responsible for at least the small fraction of that cost which we are seeking in the instant application. The denial of this modest request could only serve to discourage organizations such as the ACLU, and individuals like Mr. Mallach, from undertaking such crucial tasks in the future.

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.

C. Roy Epps

A handwritten signature in black ink, appearing to read 'C. Roy Epps', is written over a horizontal line. The signature is stylized and cursive.