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October 5, 2015

Superior Court of New Jersey
Somerset County Court House
Attention: *Civil Case Filing*
40 North Bridge Street
Somerville, NJ 08876

- Re: In The Matter of the Township of Warren for a Judgment of Compliance of Its Third Round Housing Element and Fair Share Plan
Docket No. SOM-L-904-15
- Re: In The Matter of the Borough of Watchung for a Judgment of Compliance of Its Third Round Housing Element and Fair Share Plan
Docket No. SOM-L-902-15
- Re: In The Matter of the Borough of Rocky Hill for a Judgment of Compliance of Its Third Round Housing Element and Fair Share Plan
Docket No. SOM-L-901-15
- Re: In The Matter of the Borough of Frenchtown for a Judgment of Compliance of Its Third Round Housing Element and Fair Share Plan
Docket No. HNT-L-309-15

Dear Sir/Madam:

This office represents the Township of Warren, the Borough of Watchung, the Borough of Rocky Hill and the Borough of Frenchtown in the above referenced Mount Laurel litigation.

Enclosed please find an original and one copy of the following:

Notice of Motion to Extend Temporary Immunity and Time to Obtain and Submit Expert's Report;
Letter Brief and Certification of Counsel in support of motion.

An original and three copies of proposed forms of Order for each municipality are also enclosed herein.

Please file the original moving papers and return a filed copy to the undersigned in the envelope provided herein. This firm's check in the amount of \$50 is enclosed for the filing fee.

Very truly yours,

Steven A. Kunzman

SAK:kc

Encls

cc: All Counsel/Parties on Attached Service Lists via email

Steven A. Kunzman, Esq. (Atty I.D. # 012731981)
Our File Nos.: W525/ C22168/ C22169/ C22170

**DiFRANCESCO, BATEMAN, KUNZMAN,
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Attorneys for the Township of Warren, Borough of Watchung,
Borough of Rocky Hill and Borough of Frenchtown

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION

SOMERSET COUNTY:
DOCKET NOS.:

Township of Warren: SOM-L-904-15
Borough of Watchung: SOM-L-902-15
Borough of Rocky Hill: SOM-L-901-15

HUNTERDON COUNTY:
DOCKET NO.:

Borough of Frenchtown: HNT-L-309-15

IN RE:	:	<i>Civil Actions</i>
THE TOWNSHIP OF WARREN	:	
THE BOROUGH OF WATCHUNG	:	<u>MOUNT LAUREL</u>
THE BOROUGH OF ROCKY HILL	:	
THE BOROUGH OF FRENCHTOWN	:	NOTICE OF MOTION TO EXTEND
COMPLIANCE WITH THIRD ROUND	:	TEMPORARY IMMUNITY AND TIME TO
<u>MOUNT LAUREL</u> AFFORDABLE	:	OBTAIN AND SUBMIT AN EXPERT'S
HOUSING OBLIGATION	:	REPORT
	:	
	:	
	:	

TO: Honorable Thomas C. Miller, P.J.Civ.
Vicinage 13 Mount Laurel Judge
Superior Court of New Jersey
Somerset County Court House
20 North Bridge Street
Somerville, NJ 08876

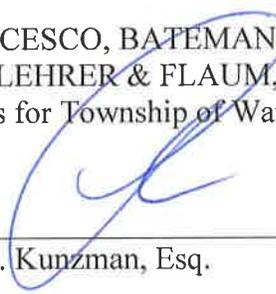
PLEASE TAKE NOTICE that Plaintiffs in the above matters have filed Declaratory
Judgment actions seeking to have the Court review their compliance with their Third Round

Mount Laurel low and moderate income housing obligations, and the undersigned attorney on behalf of the municipalities will move at 9:00 a.m., or at such other time as the court hereafter directs, on the regularly scheduled motion date of October 23, 2015, or on such other date as the court hereinafter directs, for entry of an Order which will extend the temporary immunity to allow for the municipalities to file their experts reports as to their fair share numbers.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely in support of their motion on the accompanying Letter Brief and Certification signed by Steven A. Kunzman, in support of the motion which is being submitted to the Court pursuant to Rule 1:6-2. This office requests **oral argument** pursuant to R.1:6-2(d) if opposition if timely filed.

PLEASE TAKE FURTHER NOTICE a proposed form of Order is attached hereto.

DIFRANCESCO, BATEMAN, KUNZMAN,
DAVIS, LEHRER & FLAUM, P.C.
Attorneys for Township of Warren

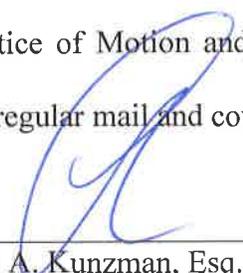
By: 

Steven A. Kunzman, Esq.

Dated: October 5, 2015

CERTIFICATION

I hereby certify that the within Notice of Motion and supporting moving papers have been served upon the appropriate Court via regular mail and counsel and parties via email.

By: 

Steven A. Kunzman, Esq.

Dated: October 5, 2015