

PLEASE TAKE NOTICE that by Case Management Order of the Honorable Michael C. Gaus, J.S.C., that on Friday, February 14, 2020 at 1:30 P.M., or as soon thereafter as counsel may be heard, the undersigned, DiFrancesco, Bateman, Kunzman, Davis, Lehrer & Flaum, P.C. (Albert E. Cruz, Esq., appearing), attorneys for the plaintiff Township of Chatham, shall apply to the Superior Court of New Jersey for an Order granting the following relief:

1. That Township of Chatham Ordinance 2019-22, a Development Fee Ordinance, and related Spending Plan be approved.
2. That the Township of Chatham be granted until June 14, 2020 for compliance, with a Compliance Hearing scheduled after that date on a date to be set by Judge Gaus.
3. That the construction start date of the 100% municipally sponsored affordable housing development be extended until June 30, 2022.
4. That the Township of Chatham's immunity from builder's remedy lawsuits be extended until the Compliance Hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the Certifications of Gregory J. LaConte, Albert E. Cruz, Esq., Robert S. Hoffmann and Francis J. Banisch, III, P.P. and Brief all in support of said application.

A proposed form of Order is being simultaneously submitted.

Calendar Call: None

Last Case Management Conference: December 17, 2019

Next Case Management Conference: February 14, 2020

Trial Date: None

DiFrancesco, Bateman, Kunzman,
Davis, Lehrer & Flaum, P.C.
Attorneys for Township of Chatham

By: Albert E. Cruz
Albert E. Cruz, Esq.

Dated: January 10, 2020

CERTIFICATION

I hereby certify that this Notice of Motion and supporting moving pleadings were e-filed with the Superior Court of New Jersey and sent to Counsel by e-mail and regular mail, including the Special Master.

By: Albert E. Cruz
Albert E. Cruz, Esq.

Dated: January 10, 2020