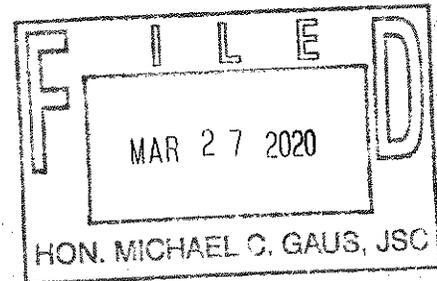


Fair Share Housing Center
 510 Park Boulevard
 Cherry Hill, New Jersey 08002
 P: 856-665-5444
 F: 856-663-8182
 Attorneys for Fair Share Housing Center
 By: Bassam F. Gergi, Esq. (302842019)
 bassamgergi@fairsharehousing.org



**Fair Share Housing Center,
 Inc.,**

Plaintiff,

v;

**The Township of Chatham,
 County of Morris, State of New
 Jersey; the Planning Board of
 the Township of Chatham;
 Sterling/Sun at Chatham, LLC;
 and Southern Boulevard Urban
 Renewal, LLC,**

Defendants.

Superior Court of New Jersey
 Law Division, Morris County

Docket No. MRS-L-280-20

Civil Action

**Consent Order and
 Stipulation of Dismissal**

This matter having been brought to the Court's attention upon the joint submission of the parties to the litigation, whose counsel have consented to the entry of this Consent Order and Stipulation of Dismissal;

It is on March 27, 2020 hereby **ORDERED** by the Court and **IT IS HEREBY STIPULATED** by Fair Share Housing Center, Inc. ("FSHC"); the Township of Chatham; the Planning Board of the Township of Chatham; Sterling/Sun at Chatham, LLC

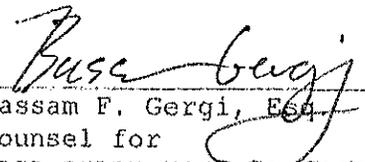
("Sterling/Sun"); and Southern Boulevard Urban Renewal, LLC ("SBUR"); through their respective attorneys, that:

1. This matter be and is hereby dismissed without prejudice, and without costs or attorney's fees.
2. If the Court approves the fairness of the March 12, 2020 Amended Settlement Agreement in IMO the Application of the Township of Chatham, Docket No. MRS-L-1659-15, on July 10, 2020, then this stipulation of dismissal shall be with prejudice.
3. If the Court does not approve the fairness of the March 12, 2020 Amended Settlement Agreement on July 10, 2020, FSHC shall have the right to refile the existing Complaint in this matter with necessary amendments as a new Complaint on or before July 31, 2020, unless this date is extended either by mutual consent of all of the parties or by Court Order.
4. FSHC's new Complaint shall be deemed filed as if it were filed on February 3, 2020 (the date the existing Complaint was filed) for the calculation of timeliness, which shall include but shall not be limited to any applicable time periods for statute of limitation purposes, any determination under Rule 4:69-6, and the vesting of rights. Other than as set forth above, each of the parties reserve all of their rights existing at law and in equity regarding the lawsuit including all procedural and substantive issues.

5. Copies of this Consent Order and Stipulation of Dismissal shall be served to all parties through eCourts and by Counsel for FSHC via email within seven days of its entry.


HON. Michael C. Gaus, J.S.C.

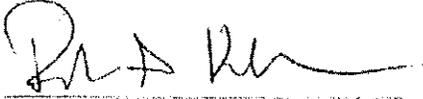
STIPULATED TO BY:


Bassam F. Gergi, Esq.
Counsel for
FAIR SHARE HOUSING CENTER


Albert E. Cruz, Esq.
Counsel for the
TOWNSHIP OF CHATHAM

March 26, 2020

Date


Robert A. Kasuba, Esq.
Counsel for
STERLING/SUN AT CHATHAM, LLC
SOUTHERN BOULEVARD URBAN RENEWAL,
LLC

March 22, 2020

Date


Steven K. Warner, Esq.
Counsel for the
PLANNING BOARD OF CHATHAM

3-25-2020

Date

3/20/20
Date