

# KIPP & ALLEN, LLP

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July 30, 2015

**VIA FEDERAL EXPRESS**  
Clerk of the Law Division  
Bergen County Justice Center  
10 Main Street  
Hackensack, New Jersey 07601

**Re: Borough of East Rutherford for a Judgment of Compliance and Repose  
Docket No.: BER-L-5925-15**

Dear Sir or Madam:

I am the Borough Attorney for East Rutherford in the above described matter. Enclosed for filing you will find an original and two copies of the following:

1. Notice of Motion for an Order Granting East Rutherford a Period of Time to Complete and Updated Housing Element and Fair Share Plan and for Temporary Immunity from Exclusionary Zoning Lawsuits During the Pendency of this Litigation;
2. Certification of George R. Stevenson, PP in support of the motion;
3. Letter Brief in support of the motion; and
4. Proposed form of Order.

Would you kindly file the enclosed. Upon filing, would you kindly return "Filed" copies to me. A self-addressed, stamped envelope is enclosed for your convenience.

My check in the amount of \$50 is enclosed in payment of the filing fee.

Thank you for your anticipated cooperation. If you need anything further, please do not hesitate to call.

Very truly yours,

  
Richard J. Allen, Jr.

RJA:aa  
Enclosures

cc: Hon. Menelaos W. Toskos, J.S.C. – via Federal Express  
Danielle Lorenc, Borough Clerk – via e-mail only  
Robert T. Regan, Esq. – via e-mail only  
James T. Novello, Esq. – via e-mail only  
Richard C. Cedzidlo, Esq. – via e-mail only