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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