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CRANFORD DEVELOPMENT

ASSOCIATES, LLC, a limited liability company organized under the laws of the State of New Jersey, **SAMUEL HEKEMIAN**, **PETER HEKEMIAN**, **JEFFREY HEKEMIAN** and **ANN KRIKORIAN** as trustee for **RICHARD HEKEMIAN** and **MARK HEKEMIAN**,
Plaintiffs,

vs.

TOWNSHIP OF CRANFORD, MAYOR AND COUNCIL OF THE TOWNSHIP OF CRANFORD and the **PLANNING BOARD OF THE TOWNSHIP OF CRANFORD**,
Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY**

DOCKET NO. UNN-L-003759-08

CIVIL ACTION - MOUNT LAUREL

**NOTICE OF MOTION FOR LEAVE TO
AMEND JUDGMENT OF COMPLIANCE
AND REPOSE AND RELATED RELIEF**

TO: Stephen Eisdorfer, Esq.
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Princeton, NJ 08540
Attorneys for Plaintiffs

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9 Main Street
Flemington, NJ 08822
Special Master

PLEASE TAKE NOTICE that, on September 1, 2017, at 9:00 a.m., or at a date and time to be determined by the Court, the undersigned attorneys for Defendants Township of Cranford shall move for an Order granting the following relief:

1. Granting Leave to Amend the Township's Round 3 Judgment of Compliance and Repose, dated May 22, 2013, through the procedures set forth in N.J.A.C. 5:91-13.1 through 13.6;
2. Directing the court-appointed Special Master to review the Township's Initial Realistic Development Potential (RDP) and Crediting Analysis and to assist the Township in finalizing same;

3. Directing the Township to provide the Special Master with a preliminary plan of how it intends to address its "unmet need," without prejudice to any legal position on "unmet need" that it may have;
4. Directing the Special Master to notify the Township in writing if she determines that the Township's plan to address the unmet need is satisfactory;
5. Directing the Township, immediately after receiving written notice from the Special Master, to commence the process of amending its approved Housing Element and Fair Share Plan utilizing the procedures, deadlines, and notice provisions set forth in N.J.A.C. 5:91-13.1 through 13.6;
6. Any other relief that the Court finds reasonable and just.

PLEASE TAKE FURTHER NOTICE that the Defendants shall rely on the Certification(s) of Michael A. Jedziniak, Esq., Township Administrator Terence Wall, and Randall Gottesman, P.P. together with the accompanying Brief.

PLEASE TAKE FURTHER NOTICE that, in accordance with the provisions of Rule 1:6-2, this matter is submitted to the Court for a ruling on the papers unless opposition is received, in which event oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order has been attached hereto in accordance with Rule 1:6-2.

Respectfully submitted,


MICHAEL A. JEDZINIAK, ESQ.

Date: July 14, 2017