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August 27, 2020

Via eCourts

Hon. Thomas J. Walsh J.S.C.
Superior Court of New Jersey
Union County Courthouse
2 Broad Street
Elizabeth, New Jersey 07207

**Re: In the Matter of the Application of the Township of Cranford,
Docket No. UNN-L-3976-18**

Dear Judge Walsh:

I write on behalf of Fair Share Housing Center (FSHC) to respectfully request that the joint fairness and compliance hearing currently scheduled for October 5, 2020, be adjourned until mid-November.

There are two reasons for this request. First, lead counsel for FSHC on this matter, Mr. Gordon, is on paternity leave. His family welcomed a baby boy last week. Second, the parties to this matter as well as the Special Master believe that the additional time could be useful in order to try to address a potential objection prior to the hearing.

The undersigned has communicated with counsel for the Township, for Hartz, as well as the Special Master, and all have consented to the adjournment.

A proposed order is attached that leaves the dates and times for the new hearing open. Because it anticipates the hearing to be scheduled for mid-November, it requires the Township to publish notice on or before September 18, 2020; objections to be filed on or before October 14, 2020; responses to objections to be filed on or before October 30, 2020; and the Special Master to submit her report at least one (1) week before the hearing.

If Your Honor has any concerns or questions, please do not hesitate to let us know. Thank you for your attention to this matter.

Respectfully,

A handwritten signature in black ink that reads "Bassam Gergi".

Bassam F. Gergi, Esq.
Counsel for Fair Share Housing Center

c: Kendra Lelie, Special Master
eCourts Service List

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**In the Matter of the Application
of the Township of Cranford,
County of Union.**

SUPERIOR COURT OF NEW JERSEY
Law Division, Union County
Docket No. UNN-L-3976-18

CIVIL ACTION

**Amended Order Scheduling Joint
Fairness & Compliance Hearing
and Extending Immunity from
Mount Laurel Suits**

THIS MATTER having been brought before the Court by August 27, 2020 letter from Fair Share Housing Center (FSHC), through its counsel, Bassam F. Gergi, Esq., requesting a brief adjournment of the Joint Fairness and Compliance Hearing scheduled for October 5, 2020, and upon the consent of declaratory plaintiff, Township of Cranford, through its counsel, Michael J. Edwards, Esq., and for good cause shown;

IT IS on this _____ day of _____, 2020, **ORDERED** as follows:

1. A Joint Fairness & Compliance Hearing is hereby scheduled for November ___, 2020, at ___ a.m./p.m. and, if necessary, continuing on November ___, 2020, at ___ a.m./p.m.

2. The Township shall publish Notice of the hearing on or before September 18, 2020.

3. Any objections, and all expert reports and any other documentation and exhibits to be relied upon at the hearing, must be submitted to the Court, Special Master, Cranford, and FSHC on or before October 14, 2020.

4. Written responses to objections must be submitted to the Court and Special Master on or before October 30, 2020.

5. The Special Master shall submit her report to the Court, Cranford, and FSHC no later than one (1) week before the hearing.

6. The immunity from exclusionary zoning actions granted to the Township of Cranford, its Governing Body, and its Planning Board will remain in effect until thirty (30) days after the Joint Fairness and Compliance Hearing is held.

7. The Court has caused this Order to be filed electronically and served via eCourts.

Hon. Thomas J. Walsh, J.S.C.