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Medford Township

IN THE MATTER OF THE : SUPERIOR COURT OF NEW JERSEY
APPLICATION OF THE TOWNSHIP : BURLINGTON COUNTY
OF MEDFORD, a municipal corporation : LAW DIVISION
of the State of New Jersey, :
Petitioner :
 : DOCKET NO.: BUR-L-000215-05
 :
 : Civil Action
 :
 : **NOTICE OF MOTION REAFFIRMING**
 : **TEMPORARY IMMUNITY OF MEDFORD**
 : **TOWNSHIP FROM *MOUNT LAUREL***
 : **LITIGATION**
 :

To: ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on August 7, 2015, or as soon thereafter as counsel may be heard, the undersigned attorney for Petitioner Medford Township will move before the Honorable, Ronald E. Bookbinder, A.J.S.C., Burlington County Courts Facility, 7th Floor, 49 Rancocas Road, Mount Holly, New Jersey 08060, for an Order granting the following relief:

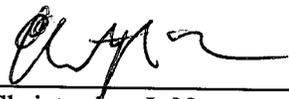
- a) Entering an Order conferring the Township of Medford and its municipal Planning Board with temporary immunity from *Mount Laurel* litigation.
- b) Granting Medford Township five (5) months to submit a Housing Element and Fair Share Plan to the Court from the date the Court determines the criteria and guidelines with which the Township must comply.
- c) In the alternative, conferring Medford Township with temporary immunity for a period of five (5) months for the date of filing of this motion.

d) In the alternative, providing that, if Medford Township files a Housing Element and Fair Share Plan within five (5) months of the filing of this motion, the immunity of *Mount Laurel* litigation shall remain in effect pending further Order by the Court.

e) Such other relief as the Court may deem equitable and fair.

In support thereof, the Planning Board will rely upon the attached brief and supporting Certifications of Christopher Norman, Esq. and Barbara Fegley, P.P. A proposed form of Order is also attached.

Dated: 7/8/15



Christopher J. Norman
Raymond, Coleman, Heinold &
Norman, LLP
Attorney for Petitioner, Medford Township

PROOF OF MAILING

Christopher Norman, of full age does hereby certify as follows:

1. I am the attorney for the Petitioner, Medford Township, in the above captioned matter.
2. On July 8, 2015, I hand-delivered the within moving papers on the within Motion to the Filing Intake, Civil Division, Superior Court of New Jersey, Burlington County Courts Facility at 49 Rancocas Road, Mount Holly, New Jersey 08060 and to the chambers of the Honorable Ronald E. Bookbinder, A.J.S.C.
3. On July 8, 2015, copies of the within moving papers in this motion were forwarded to the Service List in the matter of *In re Adoption of N.J.A.C. 5:96 & 5:97 by N.J. Council on Affordable Housing, 221 N.J. 1 (2015)* and to any other persons who provided a mailing address to the Medford Township Clerk and requested to be added to the service list for purposes of participation in this motion.

I certify that the forgoing statements made by me are true. I am aware that if any of the forgoing statements by me are willfully false, I am subject to punishment.



Christopher Norman

Dated: 7/8/15