

**ARCHER & GREINER P.C.**

Riverview Plaza

10 Highway 35

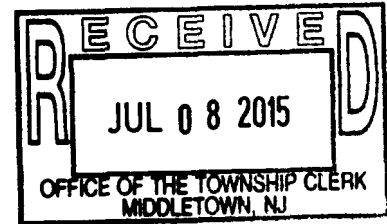
Red Bank, NJ 07701

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Attorneys for Petitioner, Township of Middletown

Brian M. Nelson (Attorney ID: 1352003)



**IN THE MATTER OF THE  
APPLICATION OF THE  
TOWNSHIP OF MIDDLETOWN,  
MONMOUTH COUNTY, a municipal  
corporation of the State of New Jersey.**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - MONMOUTH COUNTY

DOCKET NO.: MON-L-

Civil Case  
(Mount Laurel)

**NOTICE OF MOTION SEEKING  
ENTRY OF TEMPORARY IMMUNITY  
ORDER**

**TO:** Clerk, Law Division  
Monmouth County Courthouse  
Post Office Box 1266  
71 Monument Park  
Freehold, New Jersey 07728-1266

All Parties On Service List.

**PLEASE TAKE NOTICE** that on **August 7, 2015 at 9:00 a.m.**, or on such other date as scheduled by the judge assigned to hear this Mount Laurel action, the undersigned attorneys for Petitioner, Township of Middletown ("Middletown"), shall apply to the Superior Court of New Jersey, Law Division, Monmouth County located at 71 Monument Park, Freehold, New Jersey, for the entry of an Order providing Middletown with temporary immunity against constitutional compliance, exclusionary zoning or builder's remedy litigation.

**PLEASE TAKE FURTHER NOTICE** that Middletown shall rely upon its Brief and Certification of Anthony Mercantante, PP, AICP, in support of this Motion.

**PLEASE TAKE FURTHER NOTICE** that oral argument is request only if  
timely opposition is filed.

Respectfully submitted,

**ARCHER & GREINER P.C.**

Attorneys for Petitioner  
Township of Middletown

By: 

Brian M. Nelson

Dated: July 7, 2015