

# SILLS CUMMIS EPSTEIN & GROSS

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August 16, 2007

By Federal Express

Clerk, Civil Case Processing  
Union County Courthouse  
2 Broad Street, Room 107  
Elizabeth, New Jersey 07201

RECEIVED  
AUG 17 2007

BY: .....

Re: **Roselle Park VP, LLC v. Borough of Roselle Park et al.**  
Docket No.: UNN-L-338-07

Dear Sir or Madam:

We represent Plaintiff Roselle Park VP, LLC in the above-referenced matter. Please find enclosed an original and two copies of Plaintiff's motion for partial summary judgment declaring the Defendants to be non-compliant with their Mount Laurel obligations and appointing a special master, which includes:

- 1) Notice of Motion;
- 2) Brief in Support of Motion;
- 3) Certification of Shirley M. Bishop, P.P., dated July 30, 2007;
- 4) Statement of Undisputed Material Facts;
- 5) Proposed Form of Order; and
- 6) Certification of Service.

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Clerk of the Superior Court

August 16, 2007

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Please return a file-stamped copy of each of the above documents in the enclosed, self-addressed envelope. Please bill our firm's account (No 94900) for any filing charges. Should you have any questions, please do not hesitate to contact me. Thank you very much for your assistance in this matter.

Respectfully submitted,



Andrew Lettington

AL/jk  
Enclosures

cc: Jeffrey R. Surenian, Esq. (via FedEx, w/encls).  
Ronald S. Ladell, Esq. (via email, w/o encls).  
Jon. Vogel (via email, w/o encls).  
Thomas Jay Hall, Esq. (via email, w/o encls).  
Robert A. Kasuba, Esq. (via email, w/o encls).