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November 30, 2015

Via UPS Overnight

Honorable Thomas C. Miller, J.S.C.
Superior Court of New Jersey
20 North Bridge Street
Somerville, New Jersey 08876

Re: In the Matter of the Application of
The Township of Warren
for a Judgment of Compliance of its Third
Round Housing Element and Fair Share Plan
(Mount Laurel) - Docket No. SOM-L-904-15
Our File No.W-525

Dear Judge Miller:

This firm represents the Township of Warren. This letter is submitted pursuant to Paragraph 3 of your Honor's Order, dated and filed on October 23, 2015.

Paragraph 3 of that Order requires the submission of Matrix Forms on or before December 1, 2015.

Enclosed please find the Township of Warren's Matrix Form prepared by John T. Chadwick, IV, PP, entitled "Summary of Plan for Total Fair Share Obligation" consisting of a total of thirteen (13) pages. This submission is being presented *without prejudice* since the Court has yet to make the determination of the present and prospective need as required in Mount Laurel IV, 221 N.J. 1, 29 (2015). In accordance with N.J. Rule of Evidence 408, these submissions are considered to constitute a proposal in the context of settlement discussions and negotiations and, therefore, are not admissible in evidence.

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Paragraph 4 of your Order also requires "a proposed plan, schedule and commentary concerning meetings with any and all interested parties."

I am attaching a copy of the letters recently forwarded to all "interested parties" (namely, all parties who have issued letters to the Township of Warren expressing an interest in providing affordable housing) scheduling one (1) hour meetings with each party during the two (2) day period starting on December 14, 2015 and ending on the afternoon of December 15, 2015. Please note that the Special Master appointed by Your Honor has been invited to and will be attending these meetings.

I trust that the foregoing satisfactorily responds to these 2 items in Your Honor's October 23, 2015 Order.

Respectfully submitted,

Steven A. Kunzman

SAK/nam
Enc.

cc: Township Committee, Township of Warren
(c/o Patricia DiRocco, Township Clerk)
(pdirocco@warrennj.org)
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Service Lists (attached)