

STICKEL, KOENIG, SULLIVAN & DRILL, LLC

ATTORNEYS AT LAW

571 POMPTON AVENUE
CEDAR GROVE, NEW JERSEY 07009

MICHAEL D. SULLIVAN
JONATHAN E. DRILL

KATHRYN J. RAZIN
OF COUNSEL

973-239-8800 PH
973-239-0369 FX

EMAIL: jdrill@sksdlaw.com

FRED G. STICKEL, III
(1978 – 1996)
STUART R. KOENIG
(1978 – 2012)

April 13, 2021

Hon. Gregg A. Padovano, J.S.C.
Bergen County Courthouse, Chambers 331
10 Main Street
Hackensack, NJ 07601

Re: In re Borough of Saddle River Third Round Mount Laurel
Affordable Housing Obligation, Docket No. BER-L-6120-15
Filing of Additional Compliance Documents 32 to 36

Dear Judge Padovano:

As you are aware, the Borough of Saddle River (the "Borough") is continuing with the implementation of its settlement agreement with Fair Share Housing Center ("FSHC") and Saddle River Investors, LLC ("SRI") in the above declaratory judgment action even though the combined fairness and compliance hearing has not concluded. As you are also aware, I submitted the following compliance documents last week by letter dated April 9, 2021 to replace certain compliance documents:

32. Ordinance 21-1007 adopted on February 16, 2021 repealing and replacing in its entirety the municipal wide affordable housing mandatory set-aside ordinance (this document replaces document #25 which was a draft of the ordinance);
33. Ordinance 21-1008 adopted on February 16, 2021, 2021 amending the affordable housing regulations ordinance (this document replaces document #26 which was a draft of the ordinance);
34. Ordinance 21-1009 adopted on February 16, 2021 repealing and replacing in its entirety the affordable housing development fee ordinance (this document replaces document #27 which was a draft of the ordinance);

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35. Borough Council Resolution #68-21 adopting the Spending Plan and requesting court approval of the plan (this document replaces document #29 which was Resolution #48-21 adopting a prior version of the Spending Plan);
36. Borough Council Resolution #60-21 adopting an Affirmative Marketing Plan (this document replaces document #30 which was a draft of Resolution #51-21 which would have adopted the Affirmative Marketing Plan).

It has come to my attention that item #35, which is Resolution #68-21 adopting the Spending Plan, was missing page 2.

To that end, I am now re-submitting item #35, Borough Council Resolution #68-21 adopting the Spending Plan and requesting court approval of the plan (this document replaces document #29 which was Resolution #48-21 adopting a prior version of the Spending Plan).

I will arrange to have items #32 through 36 uploaded to the Borough's website.

As I advised in my April 9, 2021 letter, I intend to move all of the above documents into evidence as exhibits P-42 through P-46 at the resumption of the hearing in this matter on the basis of judicial notice pursuant to N.J.R.E. 201(a) and (d) as these documents are ordinances and resolutions of a governmental subdivision.

By copy of this letter, I will be providing the court's special master and all counsel who are participating in the combined fairness and compliance hearing with a filed copy of this letter and a filed copy of replacement item #35.

Respectfully submitted,

STICKEL, KOENIG, SULLIVAN & DRILL, LLC



By: JONATHAN E. DRILL

Copy w/ enclosures via eCourts and via email:

Frank Banisch, III, PP, AICP (special master)

Adam M. Gordon, Esq. (Attorney for Intervening Defendant FSHC)

Joshua Bauers, Esq. (Attorney for Intervening Defendant FSHC)

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Eric M. Bernstein, Esq. (Attorney for Intervening Defendant SRI)
Joshua Zielinski, Esq. (Attorney for SR Residents - NJ, objecting to the SRI sites)

Robert Simon, Esq. (Attorney for Galitis objecting to SR Residents)
Wendy Rubenstein, Esq. (Attorney for Zhanna Torres, objecting to the 78 Woodcliff Lake Road site)

John L. Schettino, Esq. (Attorney for Borough of Woodcliff Lake, objecting to the 78 Woodcliff Lake Road site, and Intervening Defendant as to the issue of providing access to Woodcliff Lake's sewer and water resources)

Richard S. Mazaway, Esq. (Attorney for the Silvers and the Rodriguez's, objecting to the 78 Woodcliff Lake Road site)

Steven G. Sanders, Esq. (representing himself and his wife pro se)

Copy w/enclosures to all other counsel of record via eCourts only