

NEW JERSEY APPLESEED
Public Interest Law Center
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Attorneys for Plaintiffs

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO. ESX-L-008631-17

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	:
PLANEWARK, BUTTON FACTORY	:
CONDOMINIUM ASSOCIATION, INC.,	:
ALEIX MARTINEZ, MADELINE RUIZ,	:
LISA SANDERS,	:
	:
Plaintiffs,	:
	:
v.	:
	:
MUNICIPAL COUNCIL OF THE CITY	:
OF NEWARK, NEWARK CENTRAL PLANNING	:
BOARD, KENNETH LOUIS, in his	:
official Capacity as City Clerk	:
of the City of Newark,	:
	:
Defendants.	:
_____	X

To: Daniel Becht, Esq.
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Manasquan, N.J. 08736
Attorney for Newark Planning Board

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Shabazz & Assoc. LLC
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Attorney for Municipal Council

Kenneth Louis
Newark City Clerk
920 Broad Street, Rm. 306

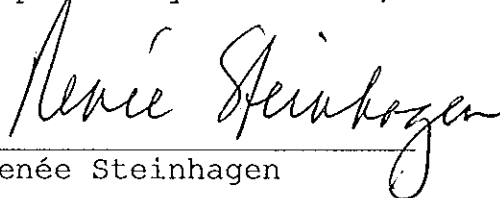
Newark, N.J. 07102

PLEASE TAKE NOTICE that on Friday, August 31, 2018, at 9:00 in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorney for PLANewark, Button Factory Condominium Association, Aleix Martinez, Madeline Ruiz and Lisa Sanders, shall make an application to the Superior Court of New Jersey, Essex County, Law Division for an Order granting Plaintiffs summary judgment on Counts I, III, and IV of their Complaint in Lieu of Prerogative Writ.

PLEASE TAKE FURTHER NOTICE that this motion is being made pursuant to R. 4:46-2 and R. 1:6-2. In support of this motion, Plaintiffs will rely on the Certifications with Exhibits attached hereto, and Letter Brief submitted herewith and made a part hereof. A proposed form of Order is also submitted with this motion.

PLEASE TAKE FURTHER NOTICE that there is presently no arbitration, pre-trial conference or trial call scheduled in this matter.

Respectfully submitted,



Renée Steinhagen

August 1, 2018