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Attorneys for Petitioner Township of Mullica

IN THE MATTER OF THE TOWNSHIP OF  
MULLICA, a municipal corporation of the  
State of New Jersey, and its Third Round  
Affordable Housing Element and Fair Share  
Plan.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
ATLANTIC COUNTY

DOCKET NO.: ATL-L-\_\_\_\_-15

(Mt. Laurel)

*Civil Action*

**NOTICE OF MOTION TO GRANT  
TEMPORARY IMMUNITY FROM  
MOUNT LAUREL LAWSUITS**

TO: (See attached COAH Service List and Supreme Court Service List)

**PLEASE TAKE NOTICE** that on August 7, 2015 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Petitioner shall apply to the Superior Court of New Jersey, Law Division, Atlantic County Courthouse, Atlantic City, New Jersey for an Order to grant Mullica Township Temporary Immunity from Mount Laurel lawsuits protecting the Township against exclusionary zoning, litigation and challenges to its Housing Element and Fair Share Plan while the Township voluntarily remains under the Court's jurisdiction;

**PLEASE TAKE FURTHER NOTICE** that in support of this foregoing, the Plaintiff will rely upon the enclosed Letter Brief and Certification of Township Planner, Tiffany CuvIELLO, filed herewith.

I hereby certify that the original of the within Notice of Motion together with supporting Certification has been forwarded for filing with the Atlantic County Superior Court, Atlantic City,

New Jersey; and

Copies hereof have been forwarded to the all parties or persons set forth on the attached Service List.

Oral argument is requested.

Proposed form of Order is annexed hereto.

NEHMAD PERILLO & DAVIS, PC  
Attorneys for Petitioner, Township of Mullica

By: \_\_\_\_\_

TRACY A. SIEBOLD

Dated: July 7, 2015