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*Attorneys for Plaintiffs*

BOROUGH OF MONTVALE, TOWNSHIP OF DENVILLE, BOROUGH OF FLORHAM PARK, BOROUGH OF HILLSDALE, TOWNSHIP OF MANNINGTON, TOWNSHIP OF MILLBURN, TOWNSHIP OF MONTVILLE, BOROUGH OF OLD TAPPAN, BOROUGH OF TOTOWA, BOROUGH OF ALLENDALE, BOROUGH OF WESTWOOD, TOWNSHIP OF HANOVER, TOWNSHIP OF WYCKOFF, BOROUGH OF WHARTON, BOROUGH OF MENDHAM, BOROUGH OF ORADELL, BOROUGH OF CLOSTER, TOWNSHIP OF WEST AMWELL, TOWNSHIP OF WASHINGTON, BOROUGH OF NORWOOD, TOWNSHIP OF PARSIPPANY-TROY HILLS, and BOROUGH OF FRANKLIN LAKES,

Plaintiffs,

vs.

STATE OF NEW JERSEY, AFFORDABLE HOUSING DISPUTE RESOLUTION PROGRAM, and GLENN A. GRANT, in his official capacity as ACTING ADMINISTRATIVE DIRECTOR OF THE COURTS,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MERCER COUNTY

DOCKET NO.: MER-L-1778-24

Civil Action

**ORDER TO SHOW CAUSE**

**PRELIMINARY INJUNCTION**  
**PURSUANT TO RULE 4:52**

**THIS MATTER** being brought before the Court by Michael L. Collins, Esq., attorney for plaintiffs, seeking relief by way of temporary restraints pursuant to Rule 4:52, based upon the facts set forth in the Third Amended Verified Complaint and Certifications

filed herewith; and it appearing that immediate and irreparable damage will probably result before notice can be given and a hearing held, and for good cause shown;

REMOTELY

IT IS on this 30th day of October, 2024, **ORDERED** that defendant(s) appear and show cause on the 3rd day of December, 2024 before the Superior Court of New Jersey, Civil Division, at the Mercer County Courthouse located at 175 South Broad Street in Trenton, New Jersey at 2:00 p.m. o'clock in the noon, or as soon thereafter as counsel can be heard, why judgment should not be entered:

A: Ordering that P.L. 2024, c. 2 shall be stayed pending final judgment of the Court in this matter;

B: Ordering that the Fourth Round under the Mount Laurel doctrine shall be stayed pending final judgment of the Court in this matter;

C: Ordering that Plaintiffs and all New Jersey municipalities shall have any obligations relative to P.L. 2024, c. 2 and/or the Fourth Round under the Mount Laurel doctrine stayed pending final judgment of the Court in this matter;

D: Ordering that Defendants are enjoined from taking any actions pursuant to P.L. 2024, c. 2 and/or the Fourth Round under the Mount Laurel doctrine, pending final judgment of the Court in this matter;

And it is further **ORDERED THAT:**

1. A copy of this order to show cause, verified complaint and all supporting affidavits or certifications submitted in support of this application be served upon the defendant(s), by way of electronic service to Deputy Attorney General Levi Klinger-Christiansen, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

2. Plaintiffs must file with the court proof of service of the pleadings on defendant(s) no later than three (3) days before the return date.

3. Defendant(s) shall file and serve a written answer, an answering affidavit or a motion returnable on the return date to this order to show cause and the relief requested in the verified complaint and proof of service of the same by Nov 15, 2024. The answer, answering affidavit or a

motion as the case may be, must be filed with the Clerk of the Superior Court in the county listed above and a copy of the papers must be sent directly to the chambers of Judge Robert Lougy, A.J.S.C.

4. The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by Nov 25, 2024. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge Robert Lougy, A.J.S.C.

5. If the defendant(s) do/does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the plaintiff filed a proof of service and a proposed form of order at least three days prior to the return date.

6. If the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than (3) days before the return date.

7. Defendant(s) take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer, an answering affidavit or a motion returnable on the return date to the order to show cause and proof of service before the return date of the order to show cause. These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed about and online at njcourts.gov. ~~Include a \$\_\_\_\_\_ filing fee made payable to the "Treasurer State of New Jersey."~~ You must also send a copy of your answer, answering affidavit to motion to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your answer, answering affidavit or motion with the fee or judgment may be entered against you by default.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at njcourts.gov.

9. The Court will entertain argument, but not testimony, on the return date of the order to show cause, ~~unless the court and parties are advised to the contrary no later than \_\_\_ days before the return date.~~

/s/ Robert Lougy

ROBERT LOUGY, A.J.S.C.

J.S.C.

As indicated above, the proceeding established herein shall be remote via TEAMS, with instructions and invitations to follow closer to the date of the event.

The proceeding scheduled herein is an open proceeding open to clients, colleagues, and all members of the public. The Supreme Court Guidelines on Electronic Devices in the Courtroom apply to remote proceedings as well. Any person or entity seeking to record the proceeding must comply with the policies and procedures set forth in the Guidelines.