

James H. Gorman, Esq. - 025951980
1129 Broad Street
Shrewsbury, NJ 07702
(732)542-4200
Attorney for Defendant,
Township of Hazlet

HIGHVIEW HOMES, LLC,	:	SUPERIOR COURT OF NEW JERSEY
	:	
Plaintiff,	:	MONMOUTH COUNTY
	:	LAW DIVISION
v.	:	
	:	DOCKET NO. MON-L-4224-15
TOWNSHIP OF HAZLET and	:	
PLANNING BOARD OF THE	:	CIVIL ACTION
TOWNSHIP OF HAZLET,	:	
	:	NOTICE OF MOTION
Defendants.	:	FOR SUMMARY JUDGMENT
	:	TO DISMISS COMPLAINT
	:	

TO: Richard J. Hoff, Jr., Esq.
Bisgaier Hoff, LLC
25 Chestnut Street, Suite 3
Haddonfield, NJ 08033

Gregory W. Vella, Esq.
Collins, Vella & Casello, LLC
2317 Highway 34, Suite 1A
Manasquan, NJ 08736

PLEASE TAKE NOTICE that James H. Gorman, Esq., attorney for defendant, Township of Hazlet, shall move before the Superior Court of New Jersey, Monmouth County, Law Division, on Friday, March 4, 2016, at 9:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, for an order granting summary judgment to the defendant,

Township of Hazlet, and dismissing plaintiff's complaint based upon plaintiff's failure to negotiate in good faith prior to the filing of its complaint, and based upon the order of immunity entered on July 28, 2008 in Elegant Properties, LLC v. Township of Hazlet, Docket No. MON-L-1559-08.


In support of this motion, counsel will rely on the Statement of Material Facts, the affidavit of Dennis Pino, the acting Township Administrator, my certification, and the letter brief submitted herewith.

A proposed form of Order is attached hereto.

Oral argument is requested.

Dated:

1/15/16


JAMES H. GORMAN, ESQ.
Attorney for Defendant,
Township of Hazlet

CERTIFICATION OF SERVICE

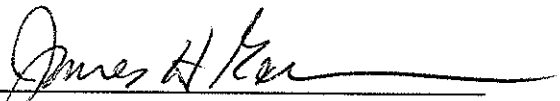
I hereby certify that the enclosed Notice of Motion and supporting papers were served within the time prescribed by the Rules of the Court upon the Clerk of the Superior Court, Monmouth County Courthouse, 71 Monument Park, Freehold, NJ 07728 and upon:

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Dated:

1/15/14



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