

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 TOWNSHIP OF HAZLET,	:	CIVIL ACTION
	:	
Defendants.	:	NOTICE OF MOTION TO COMPEL
	:	PRODUCTION OF DOCUMENTS
	:	

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, January 20, 2017, at 9:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, for an order compelling the production of unredacted copies of withheld documents to the defendant, Township of Hazlet,


specifically these documents identified in plaintiff's
privilege log:

Bates Start and End	Date	Prepared By	Received By	Privilege
HH000168 - HH000193	4/23/2015	Highview Homes, LLC	Diocese of Trenton (Real Estate Contract)	Redacted proprietary/confidential information
HH000198 - HH000199	7/14/2015	John Abene	Jeffrey Gale, Esq., Gail Gordon, David Roskos, Esq.	attorney client privilege, attorney work product
HH001003 - HH001005	9/18/2015	Jeffrey Gale, Esq./John Abene	John Abene, Christine Cofone//Gail Gordon, Jim Smith, Jeffrey Gale, Esq., Christine Cofone	redacted attorney client privilege, attorney work product
HH001010 - HH001012	8/7/2015	Stephen A. Urban, Esq.	Jim Smith, John Abene, Danielle Kinback, Esq., Gail Gordon	attorney client privilege, attorney work product
HH001035	7/24/2015	John Abene	Jeffrey Gale, Esq., Victor Herlinsky, Esq., Steve Bradach (Highview), Mike Abene, Gail Gordon	attorney client privilege, attorney work product
HH001106 - HH001107	4/29/2015	John Abene	Ryan P. Kennedy, Esq., Gail Gordon	attorney client privilege, attorney work product
HH001108 - HH001109	5/20/2015	John Abene	Jeffrey Gale, Esq., David M. Roskos, Esq., Gail Gordon, Mike Abene	attorney client privilege, attorney work product
HH001113 - HH001115	5/20/2015	David M. Roskos, Esq.	John Abene, Jeffrey Gale, Esq., Gail Gordon, Mike Abene, Neil Pirozzi	attorney client privilege, attorney work product

In support of this motion, counsel will rely on the certification of counsel, and the letter brief submitted herewith.

A proposed form of Order is attached hereto.

Oral argument is requested.



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

Dated: January 3, 2017