

MURPHY ORLANDO LLC

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Attorneys for Plaintiff/Petitioner, Township of Lawrence, Mercer County

IN THE MATTER OF THE
TOWNSHIP OF LAWRENCE,
MERCER COUNTY, NEW JERSEY

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MERCER COUNTY

Civil Action

DOCKET NO: MER-L-

**COMPLAINT FOR DECLARATORY
JUDGMENT**

Petitioner/Plaintiff, the Township of Lawrence (“Lawrence”), a municipal corporation in the State of New Jersey with its principal place of business located at 2207 Lawrenceville Rd., Lawrence Township, New Jersey 08648 in the County of Mercer, by way of Complaint for Declaratory Judgment pursuant to the Fair Housing Act, N.J.S.A. 52:27D-301 et seq. and the Mount Laurel doctrine, states as follows:

NATURE OF ACTION & JURISDICTION

1. Lawrence is a body corporate and politic organized under the laws of the State of New Jersey.
2. The Mayor and Township Council members are the governing body of Lawrence and are responsible, inter alia, to ensure that Lawrence takes the actions necessary to

achieve and maintain compliance with its obligations under the laws collectively known as the “Mount Laurel doctrine.”

3. The Mount Laurel doctrine refers to the Affordable Housing laws of New Jersey resulting from the landmark cases commonly referred to as “Mount Laurel I” (So. Burlington County N.A.A.C.P. v. Tp. of Mount Laurel, 67 N.J. 15 (1975), cert. denied, 423 U.S. 808, 96 S.Ct. 18, 46 L.Ed.2d 28 (1975), “Mount Laurel II” (So. Burlington County N.A.A.C.P. v. Tp. of Mount Laurel, 92 N.J. 158 (1983), the New Jersey Fair Housing Act of “FHA” (N.J.S.A. 52-27D-301 et seq.) and related laws.
4. The Planning Board of Lawrence Township is a municipal agency responsible under the Municipal Land Use Law, N.J.S.A. 40:55d-1 et seq., (“MLUL”), for formulating the Housing Element of the Lawrence Master Plan in a manner that complies with its obligations under the Mount Laurel doctrine.
5. Lawrence brings this action seeking Declaratory Judgment pursuant to the FHA and P.L. 2024, c.2 seeking a certification of compliance, repose and immunity from obligation exclusionary zoning lawsuits for its Fourth Round Mount Laurel affordable housing obligation for a period of ten (10) years based upon its present need or rehabilitation share of 68 units and its prospective need share of 320 units.
6. Jurisdiction properly rests with the Superior Court, Law Division, Mercer County before the designated Mount Laurel Judge for Vicinage 7 pursuant to Administrative Directive 14-25 of the Administrative Office of the Courts, dated December 18, 2024. and pursuant to the “Uniform Declaratory Judgment Law” N.J.S.A. 2A:16-50 et seq. and N.J.S.A. 52:27D-313 of the FHA, as amended by P.L. 2024, c. 2, N.J.S.A. 52: 27 D-304.1

**MUNICIPAL BACKGROUND AND HISTORY OF MOUNT LAUREL
COMPLIANCE**

7. Plaintiff/Petitioner, the Township of Lawrence, is a Municipal Corporation of the State of New Jersey with its principal place of business located at 2207 Lawrenceville Road, Township of Lawrence, County of Mercer, State of New Jersey.
8. The Township is located in the Affordable Housing Region 4, which is comprised of the Counties of Mercer, Monmouth and Ocean.
9. The Township has an extensive history of compliance with the Mount Laurel doctrine and the FHA.
10. The Township executed a Settlement Agreement with the Fair Share Housing Center (hereinafter “FSHC”) on April 28, 2017. The Planning Board then adopted a *Housing Element and Fair Share Plan* that was consistent with the 2017 Settlement Agreement on June 15th, 2018.
11. That Settlement Agreement and Housing Plan the plan established the Township’s affordable housing obligation and mechanisms to satisfy the obligation, which notably included vacant land adjustment.
12. The Township executed a *First Amendment* the settlement agreement with FHC on April 20th, 2021. This *Settlement Agreement* reflected the *First Amendment to the Housing Element and Fair Share Plan* adopted on July 20th, 2020, and the *Second Amendment to the Housing Element Fair Share Plan* adopted on November 2, 2020.
13. These Amendments to the Settlement Agreement and Housing Plan adjusted the Township's vacant land adjustment and affordable housing sites.
14. Additionally, the Township executed a *Second Amendment* to the Settlement

Agreement with FSHC on June 15th, 2021. This Settlement Agreement adjusts the Lawrence Shopping Center (Block 2001, Lots 3, 60-66, 68) unmet need site to reflect the Lawrence Zoning Board's April 28th, 2021 site plan approval for a 53 unit affordable housing development (54 total units including one on-site manager unit).

15. The purpose of this Amendment to the housing plan was to create consistent consistency with the Second Amendment to the Settlement Agreement with FSHC, specifically that Lawrence Shopping Center site will produce 53 affordable units.
16. On July 27, 2021, the Township of Lawrence received an Amended Final Third Round Judgment of Compliance and Response confirming the Township's compliance with its Fair Share Housing obligations under the Mount Laurel doctrine and the Fair Housing Act.
17. On January 21, 2025, the Township of Lawrence memorialized a Resolution adopting its Fourth Round Fair Share of Affordable Housing obligations and other actions. (Exhibit "A")
18. The Township of Lawrence's Resolution has accepted the Fourth Round of Affordable Housing obligations as established by the FHA and the Department of Community Affairs ("DCA").
19. Administrative Directive 14-24 provides that "A municipality seeking certification of compliance with the FHA shall file an action in the form of a Declaratory Judgment Complaint and civil case information statement ("CIS") in the County in which the municipality is located."

20. The Township of Lawrence also seeks by way of this Declaratory Judgment action voluntary admission into the Affordable Housing Dispute Resolution Program (“Program”).

21. To the extent that the FHA and the amendments thereto are construed or interpreted differently than Administrative Directive 14-24, the Township of Lawrence hereby reserves all of its rights and interests under the FHA and any amendments thereto and this Declaratory Judgment action is being filed in accordance with Administrative Directive 14-24 and voluntary admission into the Program.

WHEREFORE, the Petitioner/Plaintiff, the Township of Lawrence, respectfully requests that the Court enter Judgment as follows:

- a. Voluntarily admitting the Township of Lawrence into the Program;
- b. Declaring and establishing Lawrence’s Fourth Round Mount Laurel Affordable Housing obligations as provided for in the FHA and any amendments thereto;
- c. upon the adoption and approval of the Townships Housing Element and Fair Share Plan and other requirements, granting Lawrence a Judgment of Fourth Round compliance and repose, certification of compliance with the FHA and any amendments thereto and granting immunity from exclusionary zoning lawsuits for its Fourth Round Mount Laurel affordable housing obligations based upon its present need or rehabilitation share of 68 units and it's prospective needs share of 320 units for the period 2025 to 2035; and
- d. Awarding such other and further relief as the Court may deem equitable and just and necessary.

MURPHY ORLANDO LLC
Attorneys for Plaintiff/**Petitioner**
The Township of Lawrence

Dated: January 21, 2025

By: /s/ Arthur R. Sypek Jr.

ARTHUR R. SYPEK JR., ESQUIRE

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to R. 4:25-4, notice is hereby given that Arthur Sypek, Esq. and/or any other member, partner, associate or of counsel of the law firm of Murphy Orlando LLC, is hereby designated as trial counsel on behalf of the Plaintiff/Petitioner, the Township of Lawrence in the above captioned matter.

MURPHY ORLANDO LLC

Dated: January 23, 2025

By: /s/Arthur R. Sypek, Jr.

ARTHUR R. SYPEK JR., ESQUIRE

RULE 4:5-1 CERTIFICATION

Pursuant to New Jersey Court Rule 4:5-1, I hereby certify to the best of my knowledge, information and belief, the matter in controversy is not the subject of any other action currently pending or contemplated in any court or arbitration proceeding, and that I know of no other party or parties at this time who should be joined, pursuant to Rule 4:28, or who are subject to

joinder pursuant to Rule 4:29-1(b), in this action.

MURPHY ORLANDO LLC

Dated: January 23, 2025

By: /s/ Arthur R. Sypek Jr.

ARTHUR R. SYPEK JR, ESQUIRE

**CERTIFICATE OF COMPLIANCE WITH
ADMINSTRATIVE DIRECTIVE 14-24**

I hereby certify that I caused the within the Complaint for Declaratory Judgment to be filed within 48 hours after the adoption of the Lawrence Township Counsel's Municipal Resolution of the Fourth Round Fair Share obligations.

MURPHY ORLANDO LLC

Dated: January 23, 2025

By: /s/ Arthur R. Sypek Jr.

ARTHUR R. SYPEK JR., ESQUIRE

**Township of Lawrence
County of Mercer**

Resolution No. 73-25

**RESOLUTION COMMITTING TO DCA'S FOURTH ROUND AFFORDABLE HOUSING
PRESENT NEED AND PROSPECTIVE NEED NUMBERS**

WHEREAS, on March 20, 2024, Governor Murphy signed into law an Amendment to the Fair Housing Act (N.J.S.A. 52:27D-301 *et seq.*) (hereinafter "Amended FHA"); and

WHEREAS, the Amended FHA requires the Department of Community Affairs ("DCA") to produce non-binding estimates of fair share obligations on or before October 20, 2024; and

WHEREAS, the DCA issued a report on October 18, 2024 ("DCA Report") wherein it reported its estimate of the obligation for all municipalities based upon its interpretation of the standards in the Amended FHA; and

WHEREAS, the DCA Report calculates the Township of Lawrence Round 4 (2025-2035) obligations as follows: a Present Need or Rehabilitation Obligation of 68 units and a Prospective Need or New Construction Obligation of 320 units; and

WHEREAS, the Amended FHA provides that the DCA Report is non-binding, thereby inviting municipalities to demonstrate that the Amended FHA would support lower calculations of Round 4 affordable housing obligations; and

WHEREAS, the Amended FHA further provides that "[a]ll parties shall be entitled to rely upon regulations on municipal credits, adjustments, and compliance mechanisms adopted by COAH unless those regulations are contradicted by statute, including P.L. 2024, c.2, or biding court decisions" (N.J.S.A. 52:27D-311(m)); and

WHEREAS, COAH regulations authorize vacant land adjustments as well as durational adjustments and the Township reserves the right to conduct a structural conditions survey to adjust the rehabilitation/present need obligation downward if deemed appropriate; and

WHEREAS, based on the foregoing, the Township of Lawrence accepts the DCA calculations of the Township of Lawrence's Fair Share obligations and commits to its Fair Share of 68 units present need obligation and 320 units prospective need obligation subject to any vacant land and/or durational adjustments it may seek as part of the Housing Plan element and Fair Share Plan element it subsequently submits in accordance with the Amended FHA; and

WHEREAS, the Township of Lawrence reserves the right to comply with any additional amendments to the FHA that the Legislature may enact; and

WHEREAS, the Township of Lawrence also reserves the right to adjust its position in the event of any rulings in the *Montvale* case (MER-L-1778-24) or any other such action that alters the deadlines and/or requirements of the Amended FHA; and

WHEREAS, in the event that a third party challenges the calculations provided for in this Resolution, the Township of Lawrence reserves the right to take such position as it deems appropriate in response thereto, including that its Round 4 Present or Prospective Need Obligations should be lower than described herein; and

**Township of Lawrence
County of Mercer**

WHEREAS, in light of the above, the Township Council of Lawrence Township finds that it is in the best interest of the Township of Lawrence to declare its commitment to the obligations reported by the DCA on October 18, 2024 subject to the reservations set forth herein; and

WHEREAS, in addition to the above, the Acting Administrative Director issued Directive #14-24, dated December 13, 2024, and made the directive available later in the week that followed; and

WHEREAS, pursuant to Directive #14-24, a municipality seeking a certification of compliance with the FHA shall file an action in the form of a Declaratory Judgment Complaint in the County in which the municipality is located, Mercer County, within 48 hours after adoption of the Township Resolution of Fair Share obligations; and

WHEREAS, the Township of Lawrence seeks a certification of compliance with the FHA and, therefore, directs the Township Attorney to file a Declaratory Relief Action within 48 hours of the adoption of this Resolution in the Superior Court of NJ, Mercer County.

NOW, THEREFORE, BE IT RESOLVED on this 21st day of January, 2025 by the Township Council of Lawrence Township as follows:

1. All of the above Whereas Clauses are incorporated into the operative clauses of this resolution.
2. The Township of Lawrence hereby commits to the DCA Round 4 Present Need Obligation of 68 units and the Round 4 Prospective Need Obligation of 320 units described in this Resolution, subject to all reservations of rights set forth above.
3. The Township of Lawrence hereby directs it's the Township Attorney to file a Declaratory Judgment Complaint in Mercer County within 48 hours after adoption this Resolution, attaching this Resolution.
4. The Township of Lawrence authorizes the Township Attorney to attach this Resolution as an exhibit to the Declaratory Judgment action that is filed and to submit and/or file this Resolution with the Program or any other such entity as may be determined to be appropriate.
5. This Resolution shall take effect immediately, according to law.

Adopted: January 21, 2025

CERTIFICATION

I, Tonya D. Carter, Municipal Clerk of the Township of Lawrence, County of Mercer, State of New Jersey, do hereby certify that the foregoing is a true copy of a Resolution duly adopted by the Lawrence Township Council at its Council Meeting held on the 21st day of January, 2025.



Tonya D. Carter, Municipal Clerk

RECORD OF VOTE

COUNCIL	AYE	NAY	PRESENT	ABSENT	ABSTAIN	MOVE	SECOND
Mr. Bobbitt	X					X	
Mr. Kownackl	X						X
Ms. Perry	X						
Mr. Ryan				X			
Mayor Farmer	X						




Exhibit A



P.O. Box 236
 2 East Broad Street, 2nd Floor
 Hopewell, NJ 08525
 609-257-6705 (v)
 609-374-9939 (f)
 info@kylemcmamus.com

To: Lawrence Township Council

From: Elizabeth McManus, PP, AICP, LEED AP 

Re: **Fourth Round Affordable Housing Obligation**

Date: January 21, 2025

The fourth round of affordable housing has arrived. As you know, in March 2024 sweeping amendments to the New Jersey Fair Housing Act (hereinafter the “FHA”) were adopted. The most significant changes addressed the process by which municipal affordable housing obligations are calculated, satisfied, and demonstrated for compliance. Among the many changes is the abolishment of the Council on Affordable Housing (hereinafter “COAH”) and the creation of the Affordable Housing Dispute Resolution Program (hereinafter the “Program”). **The first municipal deadline regarding affordable housing is January 31, 2025, by which the Township must declare its fourth round affordable housing obligation via a Governing Body Resolution (hereinafter the “2025 resolution”).** Five months later, on June 30, 2025, the municipality must submit an adopted Housing Plan.

The following provides an overview of the Township’s affordable housing obligation and recommendations regarding the resolution declaring the affordable housing obligation.

Municipal affordable housing obligations are composed of two (2) categories. The latter category, new construction, has several subcategories.

1. **Present Need / Rehabilitation Obligation:** this obligation is an estimate of the number of substandard or overcrowded units existing in the Township that are also occupied by low and moderate income households. An obligation is calculated for each municipality for each round of affordable housing. The previous round’s rehabilitation obligation does not carry over and instead is replaced by the new round’s calculation – for example, the fourth round rehabilitation obligation replaces the third round rehabilitation obligation.

The Township’s 2025 resolution must declare this component of the affordable housing obligation.

2. **New Construction Obligation:** this obligation is the number of newly created affordable housing credits that must be created. The obligation may be satisfied, generally, through creation of new affordable housing units, conversion of market rate to affordable units, and/or eligible bonus credits. However, *Lawrence is subject to a vacant land adjustment and as such has a downward adjustment of the obligation set forth in the housing plan that reflects the Township’s vacant property (or lack thereof).*

The previous round’s new construction obligation carries over to the new round. As such, the new construction obligation is the sum of the current and all previous rounds.



- a. **Prior Round – 891:** this obligation refers to the sum of the first and second rounds from 1987-1999. It has previously been calculated by COAH and addressed in the Township’s third round housing plan. This obligation does not need to be addressed in the Township’s 2025 resolution.
- b. **Third Round – 1,110:** this obligation refers to the third round from 1999-2025. It has previously been calculated by Fair Share Housing Center and addressed in the Township’s third round housing plan. This obligation does not need to be addressed in the Township’s 2025 resolution.
- c. **Fourth Round / Prospective Need:** this obligation refers to the fourth round from 2025-2035. The Township’s 2025 resolution must declare this component of the affordable housing obligation. It should not address the vacant land adjustment, other than to note that the Township will likely conduct an adjustment in the housing plan.

The amendments to the FHA set forth the methodology for calculating municipal present need and fourth round prospective need obligations. As required by the FHA, the DCA published its report on the calculations with respect to Statewide regional need and municipal present and prospective need affordable housing obligations for the Fourth Round (the “DCA Report”). While these obligations are non-binding on municipalities, they provide a valuable resource for determining municipal affordable housing obligations. Additionally, while municipalities are permitted to calculate their own obligation, their methodology must be consistent with the FHA amendment that sets forth the steps and many of the data sources.

The DCA Report calculates the following for the Township of Lawrence:

1. **Present Need / Rehabilitation Obligation: 68 units**
2. **Fourth Round / Prospective Need Obligation: 320 units**

The following provides analysis for the Township’s consideration of the 2025 resolution declaring the Township’s rehabilitation and fourth round obligations.

Rehabilitation Obligation

I recommend accepting the 68 units and citing the DCA Report calculation. The data inputs for calculating this obligation are subject to minimal interpretation, such as the Census and American Community Survey. The Township may adjust this obligation down in the Housing Plan to reflect “on the ground” housing conditions, if appropriate.



Fourth Round Obligation

I recommend accepting the 320 units and citing the DCA Report calculation. Broadly speaking, there are 6 steps to determine the obligation for each municipality; however, only one offers the opportunity for correction or interpretation - the “land capacity factor”. As noted below, **there is opportunity to declare a 310 unit obligation based on corrections to DCA’s identification of developable lands, but doing so would have a negligible impact on the Township’s Housing Plan and, given the negligible impact, may disadvantage the Township.**

- The Township took a vacant land adjustment in the third round and will do so again in the fourth round. Municipalities that take this adjustment do not satisfy the entire affordable housing obligation, instead a compliant housing plan includes strategies more closely aligned to actual vacant and developable land in the Township (accomplished via a different calculation than the land capacity factor).
- Accepting the DCA calculation will reduce the likelihood of an objection to the Township’s declared obligation. If there is no objection to the Township’s obligation, then it will become effective / applicable sooner rather than having to be mediated or decided by the Court. This will also yield additional time to prepare the housing plan.

The following provides an overview of how the number is calculated and opportunities for correction to the DCA Report.

1. **Identify the housing region.** Lawrence has been and continues to be, as per the FHA, in Region 4. This region includes Mercer, Monmouth and Ocean Counties. *Given the identification of the State’s regions in the FHA, there is no opportunity for alteration of this step or its data inputs.*
2. **Determine the regional (affordable housing) need.** The FHA sets forth that the regional need for the 10-year round (2025-2035) shall be based on the household change experienced in the region between the most recent federal decennial census, and the second-most recent federal decennial census. The resulting change in households is divided by 2.5. *I do not recommend alteration of this step or its data inputs due to the specificity provided in how to determine the regional need.*
3. **Determine the regional and each municipal equalized nonresidential valuation factor.** This step requires that the changes in nonresidential property valuations in the municipality, since the beginning of the round preceding the round being calculated, shall be divided by the regional total change in nonresidential valuation. *I do not recommend alteration of this step or its data inputs due to the specificity provided in the data sources and calculation.*
4. **Determine the municipal and regional income capacity factor.** This step measures the difference between the median municipal household income and the lowest median household income in the region. *I do not recommend alteration of this step or its data inputs due to the specificity provided in the data sources and calculation.*
5. **Determine the municipality’s land capacity factor.** Estimate municipal developable land using the most recent NJDEP Land Use Land Cover Data set (LULC data) and weighing such land based on the planning area type in



which such land is located. The FHA sets forth one of three weighting factors for a variety of planning areas across the state. *DCA identified 202.69 acres of developable land in the Township. This land is identified based largely on classifications of land in the LULC data, as well as sources of preserved properties. This developable land can be reduced to 177.45 acres based on the below listed corrections to DCA's identification of developable land; doing so requires declaring an obligation that is less than the DCA's calculation.*

- Eliminate lands in the Special Flood Hazard Area.
- Eliminate land whose configuration, including lack of road access, precludes development.
- Eliminate County and State owned property.
- Eliminate third round affordable housing sites.

6. Determine the municipal obligation. The three factors (nonresidential value, income, and land capacity) are averaged and then applied to the regional need to determine how the need shall be allocated to each municipality. *I do not recommend alteration of this step or its data inputs due to the specificity provided in the FHA.*

c. Kevin Nerwinski
Arthur Sypek, Esq.



New Jersey Judiciary
Civil Practice Division

Civil Case Information Statement (CIS)

Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed, or attorney's signature is not affixed.

For Use by Clerk's Office Only

Payment type <input type="checkbox"/> check <input type="checkbox"/> charge <input type="checkbox"/> cash	Charge/Check Number	Amount \$	Overpayment \$	Batch Number
Attorney/Pro Se Name Arthur R. Sypek, Jr.	Telephone Number (201) 451-5000 ext.	County of Venue Mercer <input type="button" value="v"/>		
Firm Name (if applicable) Murphy Orlando LLC	Docket Number (when available)			
Office Address - Street 494 Broad Street	City Newark	State NJ	Zip 07102	
Document Type Complaint for Declaratory Judgement	Jury Demand <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Name of Party (e.g., John Doe, Plaintiff) PETITIONER: Township of Lawrence	Caption IN THE MATTER OF TWP OF LAWRENCE			
Case Type Number (See page 3 for listing) _____	Are sexual abuse claims alleged? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
	Does this case involve claims related to COVID-19? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
	Is this a professional malpractice case? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," see N.J.S.A. 2A:53A-27 and applicable case law regarding your obligation to file an affidavit of merit.			
Related Cases Pending? If "Yes," list docket numbers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Do you anticipate adding any parties (arising out of same transaction or occurrence)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Name of defendant's primary insurance company (if known)	<input checked="" type="checkbox"/> None <input type="checkbox"/> Unknown			

The Information Provided on This Form Cannot be Introduced into Evidence.

Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation

Do parties have a current, past or recurrent relationship? Yes No

If "Yes," is that relationship:

- Employer/Employee Friend/Neighbor Familial Business
 Other (explain) _____

Does the statute governing this case provide for payment of fees by the losing party? Yes No

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition.

Affordable housing action voluntary to enter Affordable Housing Dispute Resolution Program and order granting Judgement of Fourth round compliance and repose and Certification of Compliance under FHA for 4th Round and granting immunity from exclusionary zoning lawsuits for 4th round Mount Laurel affordable housing obligations.

 Do you or your client need any disability accommodations? Yes No

If yes, please identify the requested accommodation:

Will an interpreter be needed? Yes No

If yes, for what language?

I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

Attorney/Self-Represented Litigant Signature: _____ /s/ ARTHUR R. SYPEK JR.

Civil Case Information Statement (CIS)

Use for initial pleadings (not motions) under *Rule* 4:5-1

CASE TYPES

(Choose one and enter number of case type in appropriate space on page 1.)

Track I - 150 days discovery

- 151 Name Change
- 175 Forfeiture
- 302 Tenancy
- 399 Real Property (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 Book Account (debt collection matters only)
- 505 Other Insurance Claim (including declaratory judgment actions)
- 506 PIP Coverage
- 510 UM or UIM Claim (coverage issues only)
- 511 Action on Negotiable Instrument
- 512 Lemon Law
- 801 Summary Action
- 802 Open Public Records Act (summary action)
- 999 Other (briefly describe nature of action)

Track II - 300 days discovery

- 305 Construction
- 509 Employment (other than Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (LAD))
- 599 Contract/Commercial Transaction
- 603N Auto Negligence – Personal Injury (non-verbal threshold)
- 603Y Auto Negligence – Personal Injury (verbal threshold)
- 605 Personal Injury
- 610 Auto Negligence – Property Damage
- 621 UM or UIM Claim (includes bodily injury)
- 699 Tort – Other

Track III - 450 days discovery

- 005 Civil Rights
- 301 Condemnation
- 602 Assault and Battery
- 604 Medical Malpractice
- 606 Product Liability
- 607 Professional Malpractice
- 608 Toxic Tort
- 609 Defamation
- 616 Whistleblower / Conscientious Employee Protection Act (CEPA) Cases
- 617 Inverse Condemnation
- 618 Law Against Discrimination (LAD) Cases

Track IV - Active Case Management by Individual Judge / 450 days discovery

- 156 Environmental/Environmental Coverage Litigation
- 303 Mt. Laurel
- 508 Complex Commercial
- 513 Complex Construction
- 514 Insurance Fraud
- 620 False Claims Act
- 701 Actions in Lieu of Prerogative Writs

Multicounty Litigation (Track IV)

- 282 Fosamax
- 291 Pelvic Mesh/Gynecare
- 292 Pelvic Mesh/Bard
- 293 DePuy ASR Hip Implant Litigation
- 296 Stryker Rejuvenate/ABG II Modular Hip Stem Components
- 300 Talc-Based Body Powders
- 601 Asbestos
- 624 Stryker LFIT CoCr V40 Femoral Heads
- 626 Abilify
- 627 Physiomesh Flexible Composite Mesh
- 628 Taxotere/Docetaxel
- 629 Zostavax
- 630 Proceed Mesh/Patch
- 631 Proton-Pump Inhibitors
- 633 Prolene Hernia System Mesh
- 634 Allergan Biocell Textured Breast Implants
- 635 Tassigna
- 636 Strattice Hernia Mesh
- 637 Singulair
- 638 Elmiron
- 639 Pinnacle Metal-on-Metal (MoM) Hip Implants

If you believe this case requires a track other than that provided above, please indicate the reason on page 1, in the space under “Case Characteristics”.

Please check off each applicable category

- Putative Class Action** **Title 59** **Consumer Fraud**
- Medical Debt Claim**

Civil Case Information Statement

Case Details: MERCER | Civil Part Docket# L-000158-25

Case Caption: IN THE MATTER OF LAWRENCE TWP

Case Initiation Date: 01/23/2025

Attorney Name: ADELIN V SHEYNOV

Firm Name: MURPHY ORLANDO LLC

Address: 494 BROAD ST 5TH FL

NEWARK NJ 07102

Phone: 2014515000

Name of Party: PETITIONER : Township of Lawrence

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: AFFORDABLE HOUSING

Document Type: Complaint

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Township of Lawrence? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO **Medical Debt Claim?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

01/23/2025

Dated

/s/ ADELIN V SHEYNOV

Signed

