

Donald J. Sears, Esq.
Township of South Brunswick
540 Ridge Road
P.O. Box 190
Monmouth Junction, NJ 08852
Phone No.: (732) 329-4000

Attorney for Declaratory Plaintiff,
Township of South Brunswick

<p>IN THE MATTER OF THE APPLICATION OF THE TOWNSHIP OF SOUTH BRUNSWICK FOR A JUDGMENT OF COMPLIANCE AND REPOSE AND TEMPORARY IMMUNITY FROM <u>MOUNT LAUREL</u> LAWSUITS</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION MIDDLESEX COUNTY</p> <p>DOCKET NO.: MID-L-3878-15</p> <p>CIVIL ACTION – <i>MOUNT LAUREL</i></p> <p>CERTIFICATION OF DONALD J. SEARS</p>
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I, Donald J. Sears, of full age, do hereby certify as follows:

1. I am an attorney-at-law in the State of New Jersey, employed as the Director of Law for the Township of South Brunswick, the attorney for the Declaratory Plaintiff in the above-captioned matter, and have personal knowledge of the facts set forth in this certification.
2. This certification is made in support of the Township’s Motion for Extension of Temporary Immunity on return of an Order to Show Cause, to be considered by the court on February 19, 2016.
3. At the Case Management Conference held on January 13, 2016, the court rejected portions of the Township’s latest version of its draft preliminary Third Round Plan, directing the Township to add sites for inclusionary development.
4. Although the Township was not directed to meet again with any of the objector/intervenors, the Township did in fact meet with Richardson Fresh Ponds/Princeton Orchards on January 29, 2016, to further discuss its inclusionary development proposal to determine if the Township’s concerns with the proposal could be resolved.
5. The Township also met with representatives of Hovnanian and the Ingerman Group on January 27, 2016, to further discuss their joint proposal for inclusionary development of several possible sites.

6. The Township also had ongoing discussions with objector/intervenor Stanton Girard, LLC, regarding development of its site as a possible inclusionary site.

7. Subsequent to the meetings, I had follow-up discussions and/or exchanged further correspondence with these parties to further explore possible inclusion of one or more of these properties in the Township's amended preliminary plan.

8. As a result of these meetings and follow-up discussions, the Township has prepared another amended draft preliminary Plan for submission to the court which includes several inclusionary development sites in compliance with the court's directive.

9. Also at the January 13, 2016, Case Management Conference, the court denied an informal letter request for consolidation of all Middlesex County cases for purposes of determining the fair share obligation of each municipality and the acceptable compliance mechanisms available to meet said obligations. Since the request was not made by formal motion, the court declined to include this denial in the Case Management Order.

10. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: February 11, 2016

s/ Donald J. Sears
By: _____
Donald J. Sears