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December 21, 2020

Hon. Gregg A. Padovano, J.S.C.
Bergen County Courthouse, Chambers 331
10 Main Street
Hackensack, NJ 07601

Re: In re Borough of Saddle River Third Round Mount Laurel
Affordable Housing Obligation, Docket No. BER-L-6120-15
Filing of Additional Compliance Documents 16 thru 22 ahead of
January 21, 2021 Combined Fairness and Compliance Hearing

Dear Judge Padovano:

As you are aware, I represent the Borough of Saddle River (the "Borough") in the above declaratory judgment action which has a combined fairness and compliance hearing scheduled for January 21, 2021.

As you are also aware, I submitted to the court via eCourts compliance documents identified in my transmittal letter dated December 20, 2020 as items #1 through #15, and I advised in that letter that I may also submit some additional compliance documents today, December 21, 2020.

I am now submitting the following additional compliance documents via eCourts and leave it up to the court to decide whether they should also be entered as exhibits during the January 21, 2021 hearing:

16. Ordinance No. 20-984 (Bond ordinance authorizing purchase of 2 Choctaw Trail);
17. Ordinance No. 20-985 (Bond ordinance authorizing purchase of 3 Choctaw Trail);
18. Ordinance No. 20-1002 (Bond ordinance authorizing purchase of 1 Choctaw Trail);

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19. Ordinance No. 20-1004 (Bond ordinance authorizing additional amount of bond for purchase of 1 Choctaw Trail, which ordinance is in draft form and is listed on the December 21, 2020 Borough Council meeting for adoption after second reading and public hearing);
20. Ordinance No. 20-987 (Bond ordinance authorizing purchase of 78 Woodcliff Lake Road);
21. Resolution No. 200-20 (Resolution of intent to fund affordable housing programs, which resolution is in draft form and is listed on the December 21, 2020 Borough Council meeting for adoption); and
22. Letter from Borough Engineer Martin Spence dated December 21, 2020 finding that constructing sidewalks from the O'Donnell site to the Wandell School property is feasible and that the Borough will contact effected property owners for a voluntary sale of additional easement area to the Borough to allow the construction of said sidewalks.

By copy of this letter, I will be providing the court's special master and all counsel who will be participating in the combined fairness and compliance hearing with a filed copy of this letter and filed copies of all of the above compliance documents.

Respectfully submitted,

STICKEL, KOENIG, SULLIVAN & DRILL, LLC



By: JONATHAN E. DRILL

Copy w/ enclosures via eCourts and via email:

Frank Banisch, III, PP, AICP (special master)
Adam M. Gordon, Esq. (Attorney for Intervening Defendant FSHC)
Eric M. Bernstein, Esq. (Attorney for Intervening Defendant SRI)
Thomas P. Scrivo, Esq. (Attorney for Objector SR Residents - NJ)
Robert Simon, Esq. (Attorney for Galitis objecting to SR Residents)
Wendy Rubenstein, Esq. (Attorney for Objector Zhanna Torres)
John L. Schettino, Esq. (Attorney for Objector Borough of Woodcliff Lake)

Copy w/enclosures to all other counsel of record via eCourts only