Gregg F. Paster & Associates Gregg F. Paster, Esq. (Atty. ID 036951992) 18 Railroad Avenue - Suite 104 Rochelle Park, New Jersey 07662 Ph#: 201-489-0078 * Fax#: 201-489-0520 Attorneys for Petitioner/Plaintiff, Borough of Dumont

THE MATTER OF THE APPLICATION OF THE BOROUGH OF DUMONT, A MUNICIPAL CORPORATION OF THE STATE OF NEW JERSEY

Plaintiff/Petitioner

SUPERIOR COURT OF NEW JERSEY LAW DIVISION: BERGEN COUNTY

Docket No.: BER-L-6065-15

CIVIL ACTION

NOTICE OF MOTION FOR GENERAL IMMUNITY AND FOR A STAY OF SPECIFIC PROCEEDINGS

TO: Clerk of Superior Court
Superior Court of New Jersey
Law Division-Bergen County
10 Main Street
Hackensack, New Jersey 07601

ON NOTICE TO: All parties on Supreme Court Notice list

Antimo A. Del Vecchio, Esq.
BEATTIE PADOVANO, LLC
50 Chestnut Ridge Road
P.O. Box 244
Montvale, New Jersey 07645
Attorney for Landmark Dumont, LLC

Ronald S. Ladell
AVALON BAY COMMUNITIES
517 Route One South, Suite 5500
Iselin, New Jersey 08830
Interested Party

PLEASE TAKE NOTICE that on Friday, July 24, 2015 at 9 o'clock in the forenoon or as soon thereafter as counsel may be heard, the undersigned counsel for Petitioner, Borough of Dumont will apply to the Judge of the Superior Court sitting in Hackensack and assigned to hear such Motion at 10 Main Street, Hackensack, New Jersey, for an Order granting immunity from suits and actions against the Petitioner, pursuant to the New Jersey Supreme Court's Opinion and Order In the Matter of the Adoption of N.J.A.C. 5:96 and 5:97 by the New Jersey Council on Affordable Housing, 221 N.J. 1 (2015) and in the interest of justice and equity; and

PLEASE TAKE FURTHER NOTICE THAT, Defendant will rely upon the Certifications of Darlene A. Green, PP, AICP, and Gregg F. Paster, Esq., and the brief, annexed hereto, in support of this Motion. Movant requests oral argument in the event of opposition hereto.

GREGG F. PASTER & ASSOCIATES

Attorneys for

Plaintiff/Petitioner,

Borough of Bumont

Dated: July 8, 2015

By: GREGG F. PASTER, ESQ.