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March 16, 2026

Via eCourts

Hon. Aldo J. Russo, J.S.C.
 Essex County Historic Courthouse
 470 Dr. Martin Luther King Jr. Boulevard
 Newark, NJ 07102

Re: In the Matter of the Application of the Township of Cedar Grove,
Docket No.: ESX-L-797-25

Dear Judge Russo:

This firm represents Declaratory Plaintiff Township of Cedar Grove (the "Township"), in the above referenced matter. In that connection, enclosed for filing is:

(i) Exhibit "A" – an Amended Housing Element and Fair Share Plan ("HEFSP") pursuant to Paragraph 3 of your February 17, 2026 Order;

(ii) Exhibit "B" – December 22, 2025 Agenda Item 3(a), "A Resolution of the Township Council of the Township of Cedar Grove Authorizing the Execution of a Revised Mediation Agreement Before the Affordable Housing Dispute Resolution Program";

(iii) Exhibit "C" – Ordinance No. 26-965 "Affordable Housing and Revised Regulations in Conformance with the Amended Fair Housing Act and the Township's Fourth Round Housing Plan Element and Fair Share Plan";

(iv) Exhibit "D" – Ordinance No. 26-966, an ordinance to amending Chapter 268 "Zoning" of the Township's Code to expand the Multi-Family Affordable Housing Inclusionary Overlay Zone;

(v) Exhibit "E" – Ordinance No. 26-967, repealing and replacing Chapter 38-32.2, Development Fees, in conformance with the Amended Fair Housing Act and the Township's Fourth Round Housing Element and Fair Share Plan;

Hon. Aldo J. Russo, J.S.C.

March 16, 2026

Page 2

(vi) Exhibit "F" – March 16, 2026 Agenda Item 3(a), "Resolution of the Council of the Township of Cedar Grove Adopting an 'Affordable Housing Administrative Agent Policies and Procedure Manual' For the Township of Cedar Grove";

(vii) Exhibit "G" – March 16, 2026 Agenda Item 3(b), "Resolution of the Council of the Township of Cedar Grove Adopting an 'Affirmative Marketing Plan' for the Township of Cedar Grove";

(viii) Exhibit "H" – March 16, 2026 Agenda Item 3(c), "Resolution of the Council of the Township of Cedar Grove Adopting a 'Market-To-Affordable Program Guidelines' For the Township of Cedar Grove";

(ix) Exhibit "I" – March 16, 2026 Agenda Item 3(d), "Resolution of the Council of the Township of Cedar Grove Adopting An 'Affordability Assistance Policies and Procedures Manual' For the Township of Cedar Grove";

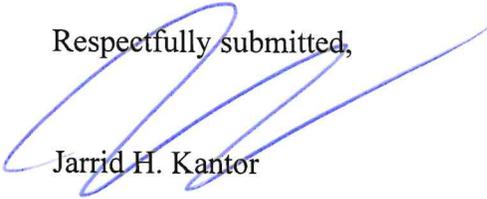
(x) Exhibit "J" – March 16, 2026 Agenda Item 3(e), "Resolution of the Council of the Township of Cedar Grove Adopting The Planning Board's Determination That The Amended Fair Share Housing Plan Is Consistent With The Master Plan";

(xi) Exhibit "K" – March 16, 2026 Agenda Item 3(f), "Resolution Reappointing Municipal Housing Liaison and Deputy Housing Liaison For the Township of Cedar Grove"; and

(xii) Exhibit "L" – March 16, 2026 Agenda Item 3(h), "Resolution of the Council of the Township of Cedar Grove Adopting an Affordable Housing Trust Fund Spending Plan."

Furthermore, pursuant to Paragraph 4 of the February 17, 2026 Order, the Township respectfully requests the Court schedule a Fairness and/or Compliance hearing and its earliest convenience to approve the Amended HEFSP and enter a formal Certification of Compliance.

Respectfully submitted,


Jarrid H. Kantor

Enc.

cc: Ariela Rutbeck-Goldman, Esq. (via eCourts and E-Mail)
Client (via E-Mail)