



ANTONELLI KANTOR RIVERA PC

ATTORNEYS AT LAW

Shareholder/Partner

DANIEL ANTONELLI*
 JARRID H. KANTOR*
 RAMON E. RIVERA

Partner

YULIEIKA TAMAYO*
 GREGORY D. EMOND*
 LORI D. REYNOLDS*
 JOHN J. D. BURKE*
 MADELAINE P. HICKS*
 MICHAEL A. SABONY*

Associate

KATHLEEN P. RAMALHO*
 JAKE T. WALESKI
 SHIVANI L. RAM
 ALYSSA BLUE
 ZOHAR C. HASSON*
 ASIA HARTGROVE

ALEXANDER L. MITCHELL
 ELIZABETH DASH
 DAMILOLA ONIFADE
 EDWARD KEAST
 DHALIA TEJADA

akrlaw.com

354 Eisenhower Parkway
 Suite 1000
 Livingston, NJ 07039
 p 908.623.3676
 f 908.866.0336

Writers Contact

d 908.623.3672
 e jkantor@akrlaw.com

*Admitted to NJ & NY

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 Millburn,
Docket No.: ESX-L-587-25**

Dear Judge Russo:

This firm represents Declaratory Plaintiff Township of Millburn (the "Township"), in the above referenced matter. In that connection, enclosed for filing per the February 23, 2026 Order are the following:

(i) Exhibit "A" – documentation addressing the requested documents from Fair Share Housing Center (deed restrictions) as shared with the Court in the Township's November 11, 2025 filing pursuant to Paragraph 1(a) of the February 23, 2026 Order;

(ii) Exhibit "B" – Ordinance No. 2731-26 "An Ordinance to Amend Development Regulations and Zoning Ordinance Section 501- Affordable Housing";

(iii) Exhibit "C" – Ordinance No. 2732-26 "An Ordinance to Amend Chapter 22 – Development Fees";

(iv) Exhibit "D" – Ordinance No. 2733-26 "An Ordinance Amending the Development Regulations and Zoning Ordinance of the Township of Millburn to Address the Requirements of the Fair Housing Act Regarding Compliance With the Town's Affordable Housing Obligations By Establishing An Affordable Housing Overlay Zone Designated As the Fourth Round-AHO District and Modifying the Zoning Map";

(v) Exhibit "E" – Ordinance No. 2734-26 "Ordinance Amending and Supplementing the Township of Millburn Development Regulations and Zoning Ordinance";

Hon. Aldo J. Russo, J.S.C.
March 13, 2026
Page 2

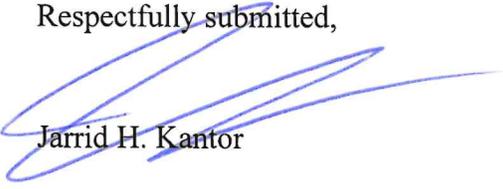
(vi) Exhibit "F" – Resolution 26-084 "Resolution of the Township of Millburn, In the County of Essex, State of New Jersey, Adopting an Affordable Housing Trust Fund Spending Plan";

(vii) Exhibit "G" – Resolution 26-085 "Resolution of the Committee of the Township of Millburn Adopting an 'Affirmative Marketing Plan' For the Township of Millburn"; and

(viii) Exhibit "H" – a clear statement on how the Township is relying upon the RPM Development for Fourth Round compliance pursuant to Paragraph 1(b) of the February 23, 2026 Order.

Furthermore, based on Paragraph 4 of the February 23, 2026 Order, the Township respectfully requests the Court schedule a Fairness and/or Compliance Hearing to consider the Township's submissions and for issuance of a formal Certification of Compliance.

Respectfully submitted,



Jarrid H. Kantor

JHK/alm
Enc.

Cc: Ariela Rutbeck-Goldman, Esq. (*via* eCourts and E-Mail)
Craig Gianetti, Esq. (*via* eCourts and E-Mail)
Client (*via* E-Mail)