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**CORRECTED FILING<sup>1</sup>**

June 13, 2025

**Via eCourts and Federal Express**

Clerk, Law Division  
Middlesex County Superior Court  
Middlesex County Courthouse  
56 Paterson Street  
New Brunswick, New Jersey 08901

**Re: In the Matter of the Application of the Borough of Highland Park  
Declaratory Judgment Filing Pursuant to Directive No. 14-24  
Docket No. MID-L-435-25**

Dear Sir or Madam:

Please be advised that this office represents Declaratory Plaintiff, the Borough of Highland Park (the "Borough"), in connection with the above-referenced matter pending before the Affordable Housing Dispute Resolution Program as part of the Fourth Round affordable housing compliance process.

Pursuant to N.J.S.A. 52:27D-304.1 et seq., enclosed, please find the Borough's Housing Element and Fair Share Plan, adopted by the Planning Board of the Borough of Highland Park (the "Planning Board") on June 12, 2025. By submitting these materials prior to June 30, 2025, the

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<sup>1</sup> The within filing is made to correct the electronical filing submitted on June 13, 2025, Trans ID No. LCV20251759545. Part 6 of the HEFSP submitted therein comprised only a portion of the pages comprising Part 6. Thus, the Borough respectfully resubmits the HEFSP for the purpose of enclosing the entirety of Part 6 of the HEFSP.

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Borough respectfully asserts its continued immunity from all inclusionary lawsuits, including Builder's Remedy Lawsuits.

The Borough Council is expected to consider a resolution endorsing the Housing Element and Fair Share Plan prior to June 30, 2025. If adopted, the resolution will be submitted through the above-referenced court docket for inclusion in the record.

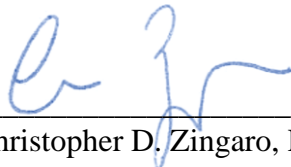
Enclosed herewith, please find the following documents:

1. Resolution No. P2025-03 Resolution of the Planning Board of the Borough of Highland Park Adopting the Fourth Round Element and Fair Share Plan, And Spending Plan, approved and memorialized on June 12, 2025.
2. 2025 Fourth Round Housing Element and Fair Share Plan, dated June 2, 2025 ("HEFSP"); and

Please note that due to its size, the enclosed HEFSP has been filed electronically on eCourts in multiple parts. Thank you for your attention and courtesies. Please do not hesitate to contact the undersigned with any questions.

Very truly yours,

**RAINONE COUGHLIN MINCHELLO, LLC**

By: \_\_\_\_\_  
Christopher D. Zingaro, Esq.

Encls. (2)

cc: Fair Share Housing Center, *(via Electronic Mail and Certified Mail)*