



RAINONE
COUGHLIN
MINCHELLO
ATTORNEYS AT LAW

Louis N. Rainone
Craig J. Coughlin*
David L. Minchello
Ronald H. Gordon
Carol A. Berlen
John F. Gillick
Brian P. Trelease*
Claudia Marchese
Matthew R. Tavares*
Sapana Shah*Δ
Michael R. Burns ✦
Christopher D. Zingaro
John P. Harrington
Harlynn A. Lack*

Marguerite Schaffer
Of Counsel

555 US Highway One South, Suite 440
Iselin, New Jersey 08830
732-709-4182 (P)
732-791-1555 (F)

150 Morristown Road, Suite 105
Bernardsville, New Jersey 07924
908-953-9300 (P)
908-953-2969 (F)

Please Respond to Iselin Office

Frank J. Dyevoich*
Lonnie J. Hinton, Jr.,
Aaron L. Rainone
Michael M. Wuest*
Scott A. Aitken, Jr.
Allan C. Zhang*
Alexander Avellan
Sarah Fitzpatrick
Raymond Stine
Xiaosong "Larry" Li

* Also admitted in New York
Δ Also admitted in DC
✦ Also admitted in Pennsylvania

CZingaro@NJRCMLAW.com

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 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.

RAINONE COUGHLIN MINCHELLO

June 13, 2025

Page 2

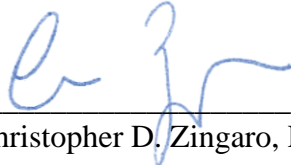
Enclosed herewith, please find the following documents:

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)*