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March 13, 2026

Via E-Courts

Hon. Thomas Daniel McCloskey, J.S.C.
Middlesex County Courthouse
56 Paterson Street, 3rd Floor, Chambers 306
New Brunswick, New Jersey 08903-0964

**Re: In the Matter of the Application of the Township of Monroe
Docket No.: MID-L-638-25**

Dear Judge McCloskey:

This office represents the Township of Monroe (the “Township”) in the above-referenced matter. On March 2, 2026, the Court entered an Order and Decision (the “March 2nd Order”) approving the Township’s Housing Element and Fair Share Plan for the Fourth Round housing cycle, conditioned on the Township adopting and filing an Amended Housing Element and Fair Share Plan and adopting all implementing ordinances and resolutions necessary to implement the “present need” and “prospective need” obligations of the Municipality for the Fourth Round housing cycle, on or before March 16, 2026.

Pursuant to the March 2nd Order, the Court dismissed the Challenge filed by Interested Parties, Center Square at Monroe, LLC and Monroe Gateway, LLC (collectively, the “Kotdawala Entities”). The March 2nd Order also retained jurisdiction for the Township’s adoption of the Amended HEFSP and implementing ordinances and resolution by or before March 16, 2026, and thereupon, for the Court’s issuance of a Certification of Compliance.

The Township has adopted said materials and respectfully requests that the Court enter a formal Certification of Compliance and repose from builder’s remedy and/or exclusionary zoning litigation in the Fourth Round housing cycle and the period of 2025 to 2035.

The Township submits for the record the below listed materials:

- Exhibit A: Amended Housing Element and Fair Share Plan, dated February 2026 and adopted February 26, 2026;
- Exhibit B: “Resolution of the Planning Board of the Township of Monroe, Middlesex County, New Jersey Adopting Monroe Township’s Revised Housing Element and Fair Share Plan for the Fourth Round of Affordable Housing Obligations,” adopted February 26, 2026;
- Exhibit C: Resolution No. R-3-2026-060 – “Resolution of the Monroe Township Council Endorsing the Revised Fourth Round Housing Element and Fair Share Plan, Approving a Revised Fourth Round Spending Plan, and Authorizing the Submission of Said Plan to the Affordable Housing Dispute Resolution Program,” adopted March 2, 2026;
- Exhibit D: Ordinance No. O-2-2026-003 – “An Ordinance of the Township of Monroe Amending Chapter 108 of the Monroe Township Code, Rezoning of Parcels Included in Monroe Township’s Round Four Affordable Housing Plan,” adopted March 2, 2026;
- Exhibit E: Ordinance No. O-2-2026-004 – “An Ordinance of the Township of Monroe Amending Chapter 108, Article 6.18J(13), of the ‘H-D Highway Development District,’ and Article 6.7K, of the ‘R-3A Residential-Agricultural District,’” adopted March 2, 2026;
- Exhibit F: Ordinance No. O-2-2026-005 – “An Ordinance of the Township of Monroe to Repeal and Replace §131 ‘Affordable Housing’ and §131A ‘Affordable Housing Development Fees,’ with Revised Regulations in Conformance with the Amended Fair Housing Act,” adopted March 2, 2026;
- Exhibit G: Ordinance No. O-8-2025-021 – “Ordinance Of The Monroe Township Council Amending Chapter 108, Article VI, “Zoning District Regulations (Rezoning Of Highway Development District Along Butchers Road),” adopted October 6, 2025;
- Exhibit H: Ordinance No. O-11-2025-027 – “Ordinance Of The Monroe Township Council Amending Chapter 108, Zoning, Of The Code Of The Township Of Monroe To Reduce The Number Of Market Rate Units Required Pursuant To The Township’s Third Round Affordable Housing Obligation And To Provide For Affordable Units To Be Applied To The Township’s Fourth Round Obligation,” adopted December 1, 2025; and

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March 14, 2026

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Thank you for the Court's attention and courtesies.

Respectfully submitted,

RAINONE COUGHLIN MINCHELLO, LLC

Attorneys for the Township of Monroe

By: 

Christopher D. Zingaro, Esq.

Encl. (8)

cc: All Counsel of Record, via e-Courts