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March 13, 2026

Via E-Courts

Hon. Linda Grasso Jones, J.S.C.
Monmouth County Courthouse
71 Monument Park, PO Box 1266, 2nd Floor
Freehold, New Jersey 07728-1266

**Re: In the Matter of the Application of the Township of Marlboro
Docket No.: MON-L-313-25**

Dear Judge Grasso Jones:

This office represents the Township of Marlboro (the "Township") in the above-referenced matter. On February 25, 2026, the Court entered a Decision and Order (the "February 25th Order") approving the Township's Housing Element and Fair Share Plan for the Fourth Round housing cycle, as amended in accordance with the settlements with Challengers Fair Share Housing Center and US Home, LLC D/B/A Lennar, respectfully (the "Amended HEFSP"). The February 25th Order requires the adoption of all ordinances and resolutions necessary to ensure implementation of the Amended HEFSP, on or before March 16, 2026.

Pursuant to the February 25th Order, the Court dismissed the Challenges of the non-settling parties¹ and retained jurisdiction for the Township's adoption of the implementing ordinances by or before March 16, 2026, and thereupon, the Court's issuance of a Certification of Compliance. This matter is scheduled for a virtual Case Management Conference on March 25, 2026 at 8:30

¹ The Non-Settling, Dismissed Challengers include: (i) Buckingham Street Owner II, LLC; (ii) Marlboro Dream Development, LLC; (iii) Crine Realty, Inc.; and (iv) Adoni Property Group, LLC (which withdrew its Challenge by electronically filed letter at Trans ID LCV20253531932)

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a.m. The Township respectfully requests, and shall further submit at the Case Management Conference, that a Certificate of Compliance be issued for the Fourth Round.

Enclosed for the record, please find the following:

- Exhibit A. Resolution of the Planning Board titled, "Resolution of the Planning Board of the Township of Marlboro, [adopting the] Revised Housing Element and Fair Share Plan (Fourth Round)," decided and memorialized on February 18, 2026;
- Exhibit B. Amended Housing Element and Fair Share Plan, Dated February 6, 2026;
- Exhibit C. Resolution No. 2026-068 – "Resolution Endorsing the Amended Housing Element and Fair Share Housing Plan Adopted by the Marlboro Planning Board on February 18, 2026, and Amending and Approving a Fourth Round Spending Plan," adopted on February 26, 2026;
- Exhibit D. Ordinance No. 2026-004 – "Ordinance Repealing and Replacing Chapter 70 ("Affordable Housing") of the Code of the Township of Marlboro Consistent with the Amendments to the New Jersey Uniform Housing Affordability Controls (UHAC) Adopted in December 2025," adopted on March 12, 2026;
- Exhibit E. Ordinance No. 2026-003 – "Ordinance Adopting the February 19, 2026 Amendment to the 2019 Scattered Sites Redevelopment Plan," adopted on March 12, 2026; and
- Exhibit F. Amendment to the 2019 Scattered Sites Redevelopment Plan, dated February 19, 2026.

Thank you for the Court's attention and courtesies.

Respectfully submitted,

RAINONE COUGHLIN MINCHELLO, LLC

Attorneys for the Township of Marlboro

By: 

Christopher D. Zingaro, Esq.

Encl. (6)

cc: All Challengers/Parties, via eCourts