

## DORSEY & SEMRAU

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IN MEMORIAM:  
JOHN H. DORSEY  
(1937-2018)

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OF COUNSEL

March 16, 2026

### VIA E-COURTS

The Honorable Janine Allen, J.S.C.  
Morris/Sussex County Mt. Laurel Judge  
Morris/Sussex Vicinage  
Washington and Court Streets  
P.O. Box 910  
Morristown, New Jersey 07963-0910

**Re: In the Matter of the Township of Washington (Morris County);  
Docket No.: MRS-L-171-25**

Dear Judge Allen:

Please be reminded that the undersigned serves as counsel of record for Plaintiff/Petitioner the Township of Washington, Morris County (hereinafter "Plaintiff" or "Township") in the above-referenced Round Four Mount Laurel Compliance litigation. In accordance with P.L. 2024, c.2 and the Program Decision Recommendation issued by Program Member the Honorable Thomas C. Miller, A.J.S.C. (ret.) on January 15, 2026 (see E-courts Trans ID: LCV2026117443) and Your Honor's Order issued on January 23, 2026 (see E-courts Trans ID: LCV2026187923), enclosed herein for filing please find the Township's Amended Fourth Round Housing Element and Fair Share Plan (HEFSP) and implementing ordinances and resolutions adopted on March 12, 2026.

Pursuant to N.J.S.A. 52:27D-304.1(f)(2)(b)-(c), the Township hereby respectfully requests the issuance of an Order Granting Final Judgment/Certification of Compliance and Repose entitling the Township to immunity from exclusionary zoning and builder's remedy litigation until July 1, 2035. We thank the Court for its courtesy and consideration.

Respectfully submitted,  
/s/Jonathan Testa  
Jonathan Testa, Esq.  
**DORSEY & SEMRAU, LLC**  
Attorneys for Plaintiff/Petitioner  
Township of Washington

Enclosures

Cc: All Counsel of Record