



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*

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

Marguerite Schaffer
Of Counsel

Frank J. Dyevoich*
Lonnie J. Hinton, Jr.,
Aaron L. Rainone
Michael M. Wuest*
Scott A. Aitken, Jr.
Allan C. Zhang*
Zurab Maisuradze
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

March 25, 2026

Via E-Courts

Hon. William G. Mennen, J.S.C.
Somerset County Courthouse
20 North Bridge Street, 3rd Floor
Somerville, New Jersey 08876

**Re: In the Matter of the Application of the Township of Franklin
Docket No.: SOM-L-169-25**

Dear Judge Mennen:

This office represents the Township of Franklin (the "Township") in the above-referenced matter. On February 9, 2026, the Court entered a Decision and Order (the "February 9th 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 Dunbar Homes, Inc.

The February 9th Order requires the adoption of all ordinances and resolutions necessary to ensure implementation of the Township's compliance plan as amended through the Program process, on or before March 16, 2026. On March 13, 2026, the Township filed the Township's Housing Plan Element and Fair Share Plan Addendum for the Fourth Round (2025-2035)¹, dated February 4, 2026 and adopted February 18, 2026 (the "Amended HEFSP"), as well as the Township's adopted implementing ordinances.

In furtherance of said filing, the Township files for the record **one additional item**. Attached, please find a Resolution of the Township Council endorsing the Amended HEFSP.

¹ Said submission was filed on March 13, 2026 but not marked as filed by the eCourts system until March 16, 2026.

RAINONE COUGHLIN MINCHELLO

March 25, 2026

Page 2

As set forth in greater detail in its March 13, 2026 filing, and pursuant to Paragraph 4 of the February 9th Order, the Township respectfully requests that a “HEFSP Confirmation Hearing” be scheduled in order that a Certification of Compliance may issue to the Township for the Fourth Round.

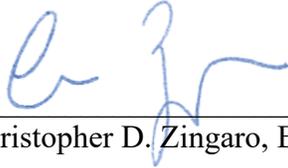
Thank you for the Court’s attention to this submission.

Respectfully submitted,

RAINONE COUGHLIN MINCHELLO, LLC

Attorneys for the Township of Franklin

By: _____


Christopher D. Zingaro, Esq.

Encl. (1)

cc: All Counsel of Record, via e-Courts