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June 20, 2025

**Via eCourts and Regular Mail**

Hon. Thomas C. Miller, A.J.S.C. (ret.)  
Program Chair  
Affordable Housing Dispute Resolution Program  
Richard J. Hughes Justice Complex  
P.O. Box 037  
Trenton, New Jersey 08625

**Re: In the Matter of the Application of the Township of Franklin  
SOM-L-169-25  
Declaratory Judgment Action filed pursuant to Directive No. 14-24  
Submission of Housing Element and Fair Share Plan**

Dear Judge Miller:

This office represents the Township of Franklin (the "Township") in connection with its participation in the Affordable Housing Dispute Resolution Program (the "Program"). Pursuant to N.J.S.A. 52:27D-304.1 et seq., enclosed, please find the Township's Housing Element and Fair Share Plan ("HEFSP"), adopted by the Planning Board of the Township of Franklin on June 18, 2025.

Pursuant to said submission, the Township respectfully asserts its continued entitlement to immunity from exclusionary zoning litigation in accordance with N.J.S.A. 52:27D-304.1(f)(2)(a). The Township Council is expected to consider a resolution endorsing the HEFSP prior to June 30, 2025. If adopted, the resolution and any supporting materials thereto will be submitted through the above-referenced court docket for inclusion in the Program's record.

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Enclosed herein, please find the following documents:

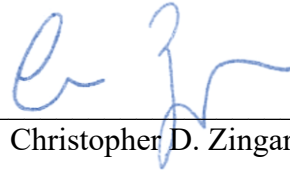
1. Housing Plan Element and Fair Share Plan, Fourth Round (2025-2035), dated May 29, 2025, of the Township of Franklin, County of Somerset, which is filed in three (3) parts due to eCourts upload limitations; and
2. Resolution of the Planning Board of the Township of Franklin, Somerset County, New Jersey, Adopting the Township of Franklin's Housing Element and Fair Share Plan for the Fourth Round of Affordable Housing Obligations.

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: Township of Franklin, *via e-mail*  
Fair Share Housing Center, *via e-mail and Certified Mail*