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October 29, 2019

Via Electronic Filing

Honorable Mary C. Jacobson, A.J.S.C.
Superior Court of New Jersey - Mercer County
Mercer County Courthouse
400 South Warren Street, 4th Floor
Trenton, NJ 08650

**RE: I/M/O Application of the Municipality of Princeton
Docket No. MER-L-1550-15**

Dear Judge Jacobson:

I write with the consent of Kevin Walsh, Esq. of Fair Share Housing Center to respectfully request an adjournment of the case management tele-conference currently scheduled for tomorrow morning at 9:00 a.m.

As Your Honor is aware, we attended mediation last Monday, October 21st, with the Honorable Philip S. Carchman, J.A.D. (ret.). Although the case did not settle, the parties remain close and Judge Carchman has been working to find common ground on the last remaining issues. Earlier this afternoon, Judge Carchman hosted a telephone conference with Princeton and Fair Share, and was scheduled to have a separate conversation with Robert Kasuba, Esq. (counsel for Avalon Bay). As a result of those discussions, the parties are continuing to exchange follow up information pursuant to Judge Carchman's efforts.

While the parties remain able to attend tomorrow's tele-conference with the Court, we are not in a position yet to offer a substantive update other than we continue our discussions with the active assistance of Judge Carchman. I do continue to believe that we are in the final stretch and will know shortly the direction this case will take. As such, this request for a brief adjournment will give the parties a few additional days to address the inquiries raised by His Honor as mediation continues.

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Should Your Honor grant this request, I would be happy to coordinate with Special Master Herbert, Mr. Walsh and Mr. Kasuba on a date/time to reschedule the conference. Alternatively, if Your Honor wishes to proceed as scheduled, please advise and I will confirm with all parties.

Your Honor's consideration of this request is greatly appreciated.

Respectfully submitted,



Kevin A. Van Hise.

cc: *(via email)*

Christine Herbert, AICP/PP, Special Master

Kevin Walsh, Esq.

Robert Kasuba, Esq.