



HOWARD D. GENESLAW  
Director

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December 21, 2021

**VIA e-COURTS**

Honorable Christine A. Farrington, J.S.C., ret'd t/a  
Superior Court of New Jersey  
Law Division, Bergen County  
10 Main Street  
Hackensack, New Jersey 07601

**Re: The Stop & Shop Supermarket Company LLC v. Township of Teaneck et als.**  
**BER-L-003507-21**

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Dear Judge Farrington:

We represent plaintiff, The Stop & Shop Supermarket Company LLC, in this matter. As discussed during the initial Case Management Conference conducted by Your Honor on October 8, 2021, this matter is an action in lieu of prerogative writ which contends that the actions of the Township, Township Council and Planning Board in designating an "area in need of redevelopment" were arbitrary, capricious, and unreasonable, that there exist invalidating conflicts of interest associated with the designation, and that there exist procedural and notice defects in the designation process.

During the Case Management Conference, the Court set a briefing schedule whereby Plaintiff's trial brief is due on January 3, 2022, Defendants' trial briefs are due February 4, 2022, and Plaintiff's response is due February 18, 2022. A trial is scheduled for March 4, 2022 at 3:30 p.m. The Scheduling Order also acknowledges that the parties are engaging in settlement discussions, and states that the Court will conduct further Case Management Conferences at the request of counsel.

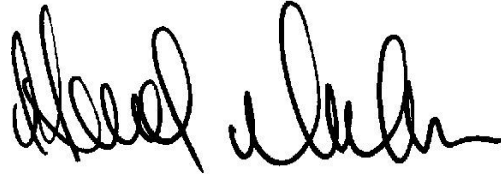
In the time since the Court conducted the initial Case Management Conference, the parties have actively engaged in settlement discussions, have been in regular contact and have made progress toward settlement. The discussions are continuing, and the parties are hopeful that they can make further progress and ultimately resolve this matter without the need for adjudication. Given the nature of municipal government meeting schedules and the need to comply with various procedural requirements, together with the complexity of the issues involved and the several owners of property within the designated redevelopment area, additional time is warranted to allow for continuation of settlement efforts. Therefore, the parties jointly request that an amended scheduling order be entered which suspends the briefing schedule and converts the trial date to a second Case Management Conference during which the parties can update the Court on the status of settlement efforts. In furtherance of this request, we enclose a proposed First Amended Scheduling Order for the Court's consideration.

GIBBONS P.C.

Honorable Christine Farrington, J.S.C., ret'd t/a  
December 21, 2021  
Page 2

Thank you for your consideration of this joint request.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Howard D. Geneslaw". The signature is written in a cursive, flowing style with some loops and flourishes.

Howard D. Geneslaw  
Director

Enclosure

cc: All counsel of Record, via eCourts