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*KEEP A LIBRARY IN WATCHUNG and RICHARD STEINFELD*

KEEP A LIBRARY IN WATCHUNG, an  
unincorporated association of citizens of the  
Borough of Watchung, and RICHARD  
STEINFELD,

*Plaintiffs,*

v.

BOROUGH OF WATCHUNG, a municipal  
corporation of the State of New Jersey,  
COUNCIL, BOROUGH OF WATCHUNG,  
and ADMINISTRATOR, BOROUGH OF  
WATCHUNG,

*Defendants.*

**SUPERIOR COURT OF NEW JERSEY**  
LAW DIVISION  
SOMERSET COUNTY  
  
CIVIL ACTION

Docket No.: SOM-L-000710-18

**ORDER TO SHOW CAUSE**

**THIS MATTER** having been brought before the Superior Court of New Jersey by the Law Office of Wolfgang G. Robinson, Esq., L.L.C., attorneys for Keep a Library in Watchung and Richard Steinfeld, seeking relief on Count Seven of the First Amended Complaint in Lieu of Prerogative Writs and for Declaratory and Injunctive Relief by way of an Order to Show Cause supported the verified facts set forth in Count Seven of the First Amended Complaint in Lieu of Prerogative Writs and for Declaratory and Injunctive Relief and the supporting papers filed herewith, and it appearing that

Count Seven of the First Amended Complaint in Lieu of Prerogative Writs may be disposed of summarily pursuant to N.J.S.A. 47:1A-6 and good cause appearing;

**IT IS** on this \_\_\_\_ day of \_\_\_\_\_, 2018,

**ORDERED**, that the Borough of Watchung, the Council of the Borough of Watchung, and the Administrator of the Borough of Watchung appear and show cause before the Superior Court of New Jersey of Somerset County at the Somerset County Courthouse located at North Bridge Street in Somerville, New Jersey at \_\_\_\_\_ or as soon thereafter as counsel can be heard, on the \_\_\_\_\_ day of \_\_\_\_\_, 2018, why an order should not be issued:

- A. Ordering the Borough of Watchung, the Council of the Borough of Watchung, and the Administrator of the Borough of Watchung to provide a copy of the resolution or ordinance that was passed by the governing body of the Borough of Watchung authorizing the Borough of Watchung to purchase the property located at 12 Stirling Drive in response to the May 16, 2018, Open Public Records Act request made by Keep a Library in Watchung and Richard Steinfeld, by and through their attorney, Wolfgang G. Robinson, Esq.;
- B. Awarding costs of this action and reasonable counsel fees; and
- C. Awarding such other relief as the Superior Court of New Jersey may seem equitable and just;

**AND IT IS FURTHER ORDERED**, that a copy of this Order to Show Cause, the First Amended Complaint in Lieu of Prerogative Writs and for Declaratory and Injunctive Relief, and all supporting papers shall be served upon the Borough of Watchung, the Council of the Borough of Watchung, and the Administrator of the Borough of Watchung by no later than \_\_\_\_\_;

**AND IT IS FURTHER ORDERED**, that Keep a Library in Watchung and Richard Steinfeld shall file proof of service no later than three days before the return date;

**AND IT IS FURTHER ORDERED**, that the Borough of Watchung, the Council of the Borough of Watchung, and the Administrator of the Borough of Watchung shall file and serve any papers in opposition to Keep a Library in Watchung and Richard Steinfeld's application for the relief set forth above by \_\_\_\_\_, and that Keep a Library in Watchung and Richard Steinfeld shall file and serve reply papers by \_\_\_\_\_;

**AND IT IS FURTHER ORDERED** that, if the Borough of Watchung, the Council of the Borough of Watchung, and the Administrator of the Borough of Watchung do not file opposition papers, Keep a Library in Watchung and Richard Steinfeld's application will be decided on the papers on the return date and relief granted by default;

Dated: \_\_\_\_\_

\_\_\_\_\_  
, J.S.C.