

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

MT. HOLLY GARDENS CITIZENS IN ACTION, INC., a New Jersey non-profit corporation, MARIA AROCHO, PEDRO AROCHO, REYNALDO AROCHO, ANA AROCHO, CHRISTINE BARNES, RITA BROOKS, INDIVIDUALLY AND AS EXECUTOR OF ESTATE OF VIVIAN BROOKS, BERNICE CAGLE, LEON CALHOUN, GEORGE BENNETT CHAMBERS, DOROTHY CHAMBERS, BEATRIZ CRUZ, SANTOS CRUZ, ELIDA ECHEVARIA, LUIS LOPEZ, NORMAN HARRIS, MATTIE HOWELL, NANCY LOPEZ, VINCENT VICTOR MUNOZ, AS ADMINSTRATOR OF THE ESTATE OF VINCENT MUNOZ, ELIZABETH HERNANDEZ, AS ADMINISTRATOR AD PROSEQUENDUM OF THE ESTATE OF ANGELO NIEVES, DOLORES NIXON, BERNICE MITCHELL AS EXECUTRIX OF THE ESTATE OF ELMIRA NIXON, LEONARDO PAGAN, JAMES POTTER, ROSEMARY ROBERTS, INDIVIDUALLY AND AS EXECUTRIX OF THE ESTATE OF WILLIAM ROBERTS, EFRAIM ROMERO, JESSICA ROMERO, SYLVIA SIMONS AS EXECUTRIX OF THE ESTATE OF HENRY SIMONS, PHYLLIS SINGLETON, JOYCE STARLING, ROBERT TIGAR, TAISHA TIRADO PAGAN, FLAVIO TOBAR, MARLENE TOBAR, RADAMES TORRES BURGOS, LILLIAN BURGOS DE TORRES, INDIVIDUALLY AND AS ADMINSTRATOR OF THE ESTATE OF RADAMES TORRES-

HON. NOEL L. HILLMAN, U.S.D.J.

Case No.: 1:08-cv-02584 (NLH/JS)

MORENO, DAGMAR VICENTE, ALANDIA WARTHEN, SHEILA WARTHEN, CHARLIE MAE WILSON LEONA WRIGHT, RUTH ALVAREZ, NOEL ORTIZ, REBECA GONZALEZ, ANGEL VERA, WANDA CRUZ, CARLOS LOTUFFO, AND HIPPOLYTA RODRIGUEZ,

Plaintiffs,

vs.

TOWNSHIP OF MOUNT HOLLY, a municipal corporation of the State of New Jersey, TOWNSHIP COUNCIL OF TOWNSHIP OF MOUNT HOLLY, as governing body of the Township of Mount Holly, KATHLEEN HOFFMAN, as Township Manager of the Township of Mount Holly, JULES THIESSEN, as Mayor of the Township of Mount Holly, KEATING URBAN PARTNERS, L.L.C., a company doing business in New Jersey, TRIAD ASSOCIATES, INC., a corporation doing business in New Jersey,

Defendants.

**STIPULATION OF DISMISSAL WITH PREJUDICE
(Fed. R. Civ. P. 41(a)(1)(A)(ii))**

Pursuant to *Fed. R. Civ. P. 41(a)(1)(A)(ii)*, the Parties in the above-captioned action (including the successors in office of the named municipal officials), through the signatures of their respective counsel on this Stipulation, stipulate to dismiss this action with prejudice according to the terms of the Settlement Agreement, all attached exhibits, and the Addendum to the Settlement Agreement executed by the Parties, which are attached hereto and incorporated by reference in the within Order and made fully a part of it. Each party to bear its own costs, including attorneys fees.

The parties further consent to the form and substance of the within Order.

For the Plaintiffs: MT. HOLLY GARDENS CITIZENS IN ACTION, INC., ANA AROCHO, REYNALDO AROCHO, MARIA AROCHO, PEDRO AROCHO, CHRISTINE BARNES, RITA BROOKS, INDIVIDUALLY AND AS EXECUTRIX FOR THE ESTATE OF VIVIAN BROOKS, LILLIAN BURGOS DE TORRES, INDIVIDUALLY AND AS ADMINISTRATOR OF THE ESTATE OF RADAMES TORRES, BERNICE CAGLE, LEON CALHOUN, GEORGE BENNETT CHAMBERS, DOROTHY CHAMBERS, ELIDA ECHEVARIA, LUIS LOPEZ, NORMAN HARRIS, MATTIE HOWELL, NANCY LOPEZ, ELIZABETH HERNANDEZ AS ADMINISTRATOR AD PROSEQUENDUM OF THE ESTATE OF ANGELO NIEVES, BERNICE MITCHELL AS EXECUTRIX OF THE ESTATE OF ELMIRA NIXON, LEONARDO PAGAN, JOYCE STARLING, TAISHA TIRADO PAGAN, DAGMAR VICENTE, CHARLIE MAE WILSON, MATTIE HOWELL, NANCY LOPEZ, VINCENT VICTOR MUNOZ AS ADMINSTRATOR OF THE ESTATE OF VINCENT MUNOZ, SYLVIA SIMONS AS EXECUTRIX OF THE ESTATE OF HENRY SIMONS, MARLENE TOBAR, FLAVIO TOBAR, ALANDIA WARTHEN, SHEILA WARTHEN, LEONA WRIGHT, RUTH ALVAREZ AND NOEL ORTIZ.

DOUGLAS E. GERSHUNY, EXEC. DIR.
SOUTH JERSEY LEGAL SERVICES, INC.

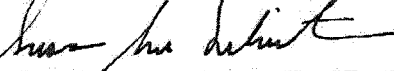
By: Olga D. Pomar
OLGA D. POMAR, ESQUIRE
745 Market St.
Camden, NJ 08102
Phone: (856)964-2010, Ext. 6232
Email: OPomar@lsnj.org

AARP FOUNDATION LITIGATION

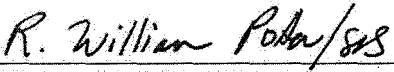
By: Susan Ann Silverstein
SUSAN ANN SILVERSTEIN, ESQ.
601 E Street, NW
Washington, DC 20049
Phone: (202)434-2060
Email: SSilverstein@aarp.org

For the Plaintiffs: SANTOS CRUZ, BEATRIX CRUZ, DOLORES NIXON, JAMES POTTER, ROSEMARY ROBERTS, INDIVIDUALLY AND AS EXECUTRIX OF THE ESTATE OF WILLIAM ROBERTS, EFRAIM ROMERO, JESSICA ROMERO, PHYLLIS SINGLETON, ROBERT TIGAR, RADAMES TORRES BURGOS, REBECA GONZALEZ, ANGEL VERA, WANDA CRUZ, HIPPOLYTA RODRIGUEZ, AND CARLOS LOTUFFO

AARP FOUNDATION LITIGATION

By: 
SUSAN ANN SILVERSTEIN, ESQUIRE
601 E Street, NW
Washington, DC 20049
Phone: (202)434-2060
Email: SSilverstein@aarp.org

POTTER & DICKSON

By: 
R. WILLIAM POTTER, ESQ
194 Nassau Street
Princeton, NJ 08542
Phone: (609)921-9555
Email: Potterrex@cs.com

For the Defendants: TOWNSHIP OF MOUNT HOLLY; TOWNSHIP COUNCIL OF TOWNSHIP OF MOUNT HOLLY; KATHLEEN HOFFMAN; and JULES THIESSEN

FLORIO PERRUCCI STEINHARDT & FADER, LLC

By: 
LOUIS CAPPELLI, JR., ESQUIRE
1010 Kings Highway South, Building 2
Cherry Hill, NJ 08034
Phone: (856)853-5530
Email: lcappelli@florioperrucci.com

MALEY & ASSOCIATES

By: 
M. JAMES MALEY, JR., ESQUIRE
931 Haddon Avenue
Collingswood, NJ 08108-2111
Phone: (856)854-1515
Email: jmaley@maleyassociates.com

For the Defendant: KEATING URBAN PARTNERS, L.L.C.

BALLARD SPAHR LLP

By: *William J. Desantis*
WILLIAM J DESANTIS, ESQUIRE
210 Lake Drive East, Suite 200
Cherry Hill, NJ 08002-1163
Phone: (856)761-3400
Email: desantisw@ballardspahr.com
For the Defendant: TRIAD ASSOCIATES, INC.,

SWEENEY & SHEEHAN

By: *Gaetano Mercogliano*
GAETANO MERCOGLIANO, ESQUIRE
Sentry Office Plaza, Suite 701
216 Haddon Avenue
Westmont, NJ 08108
Phone: (856)869-5600
Email: guy.mercogliano@sweeneyfirm.com

ORDER

The Court having reviewed the Stipulation of Dismissal with prejudice set forth above and the terms and conditions of the Settlement Agreement, all attached exhibits, and the Addendum to the Settlement Agreement executed by the Parties attached to this Order as Exhibit "A" and incorporated in this Order as if fully set forth herein; accordingly,

IT IS ORDERED that:

1. This matter is hereby **DISMISSED** with prejudice;
2. The dismissal of this matter is expressly conditioned upon the terms and conditions of the Parties' executed Settlement Agreement attached to and incorporated in this Order;
3. The Court shall retain jurisdiction of this matter for a period of six (6) years until December 31, 2019 for the purposes of taking any action needed to enforce the terms of the attached Settlement Agreement, which is a part of this Order;