

SOUTH JERSEY LEGAL SERVICES, INC. 745 Market St. Camden, NJ 08102 Phone: 856-964-2010, Ext. 6232 Email: OPomar@lsnj.org By: Olga D. Pomar, Esq. Attorneys for Plaintiffs	AARP FOUNDATION LITIGATION 601 E Street, NW Washington, DC 20049 Phone: (202) 434-2060 Email: SSilverstein@aarp.org By: Susan Ann Silverstein, Esq. Attorneys for Plaintiffs
--	--

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

MT. HOLLY GARDENS CITIZENS IN ACTION, INC., et al.,

Plaintiffs,

vs.

TOWNSHIP OF MOUNT HOLLY, et al.

Defendants.

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

Case No.: 1:08-cv-02584

**NOTICE OF CROSS-
MOTION OF PLAINTIFFS
AROCHO, HARRIS, LOPEZ,
ROMERO, AND TIGAR TO
ENFORCE SETTLEMENT
AGREEMENT**

To: Louis Cappelli, Jr., Esq.
Florio Perrucci Steinhardt & Fader
1010 Kings Highway South, Building 2
Cherry Hill, NJ 08034
(Counsel for Township Defendants)

PLEASE TAKE NOTICE that Plaintiffs Ana Arocho, Norman Harris, Nancy Lopez, Jessica Romero, and Robert Tigar cross-move pursuant to L. Civ. R. 7.1(h) to enforce the Settlement Agreement, and counsel for Plaintiffs shall appear on the 18th day of June, 2018, at 3 p.m. before the Honorable Joseph Noel L.

Hillman, United States District Court Judge for the District of New Jersey, at the United States Courthouse, 4th & Cooper Streets, Courtroom 3A, Camden, New Jersey, or as soon thereafter as counsel may be heard, for an Order enforcing the Settlement Agreement against the Township and on behalf of Plaintiffs, and denying the Township's Motion to Enforce Settlement .

PLEASE TAKE FURTHER NOTICE that counsel shall rely upon the attached brief and Declarations, with exhibits, in support of this Cross-Motion.

PLEASE TAKE FURTHER NOTICE that any objection or opposition to the Motion must be filed with the pursuant to the Court's Order To Show Cause of May 29, 2018, court by June 13, 2018. If no objection is presented, the Cross-Motion may be granted as unopposed.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting the Cross-Motion requested by the Plaintiffs has been provided to the Court and is attached hereto.

Date: June 6, 2018

/s/ Olga D. Pomar
SOUTH JERSEY LEGAL SERVICES, INC.
By: Olga D. Pomar, Esq.
745 Market St.
Camden, NJ 08102

/s/ Susan Ann Silverstein
AARP FOUNDATION LITIGATION
By: Susan Ann Silverstein, Esq.
601 E Street, NW
Washington, DC 20049

1.