

HELMER, CONLEY & KASSELMAN, P.A.  
By: SAMUEL REALE, JR. (Attorney I.D. 008111976)  
By: WILLIAM H. TOBOLSKY (Attorney I.D. 0265521979)  
600 Beverly Rancocas Road  
Willingboro, NJ 08046  
Ph. 856-428-5700  
Email: [skipreale@helmerlegal.com](mailto:skipreale@helmerlegal.com)  
Email: [williamtobolsky@helmerlegal.com](mailto:williamtobolsky@helmerlegal.com)  
Attorneys for plaintiff Angel L. Vera

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 the 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 Administrator 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 Administrator of the ESTATE OF RADAMES TORRES-MORENO, DAGMAR VICENTE, LANDIA WARTHEN, SHEILA WARTHEN, CHARLIE MAE WILSON LEONA WRIGHT, RUTH ALVAREZ, NOEL

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

Case No.: 1:08-cv-02584

**PLAINTIFF ANGEL L. VERA'S NOTICE OF MOTION AGAINST DEFENDANT TOWNSHIP OF MOUNTY HOLLY FOR**  
**a) ENFORCEMENT OF ORDER ENTERED NOVEMBER 15, 2013; FOR**  
**b) SANCTIONS; FOR**  
**c) EXTENSION OF TIME PERIOD IN WHICH THIS COURT SHALL RETAIN SUBJECT MATTER JURISDICTION FOR ENFORCEMENT OF NOVEMBER 15, 2013 ORDER FROM DECEMBER 31, 2019 UNTIL MARCH 31, 2020; AND FOR**  
**d) ATTORNEYS' FEES INCURRED BY PLAINTIFF VERA IN CONNECTION WITH THE LITIGATION OF THIS MOTION.**

<p>ORTIZ, REBECA GONZALEZ, ANGEL VERA, WANDA CRUZ, CARLOS LOTUFFO, AND HIPPOLYTA RODRIGUEZ,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>	
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To: Lou Cappelli, Jr., Esq.  
Florio, Perrucci, Steinhardt & Cappelli, LLC  
1010 Kings Highway South  
Building 2  
Cherry Hill, New Jersey 08034

**TAKE NOTICE** that on February 3, 2020 at 9:00 or as soon thereafter as counsel may be heard, or to such date and time to which this Court may postpone the hearing, the Plaintiff Angel L. Vera shall apply to the above-named Court at the Mitchell H. Cohen Building & U.S. Courthouse, 4<sup>th</sup> & Cooper Streets, Room 1050, Camden, New Jersey 08101.

Plaintiff seeks the following relief:

1. The entry of an Order directing the Defendant Township of Mount Holly to reimburse Plaintiff Angel Vera, for his out of pocket costs and expenses pursuant to the Order of

Dismissal entered on November 15, 2013, in the amount of \$6642, said payment to be received within sixty days from the date of the entry of the Order;

2. The entry of an Order directing the Defendant Township of Mount Holly to pay Plaintiff Angel Vera, in an amount to be determined by the Court, for the legal fees and costs associated with the filing and prosecution of the instant Motion, pursuant to Fed.R.Civ.Proc. 54(b)(2)(B);
3. The entry of an Order sanctioning the Defendant Township of Mount Holly for its willful non-compliance with the aforesaid Order for Dismissal and Global Settlement Agreement, in an amount to be determined by this Court; and
4. The entry of an Order extending the Court's subject matter jurisdiction to enforce the terms of the aforesaid Order of Dismissal, as well as the Global Settlement Agreement, from December 31, 2019 to March 31, 2020.

**TAKE FURTHER NOTICE** that if you want to file Opposition to this motion you must do so, in writing, on or before January 27, 2020, by filing your Opposition with the Clerk of the Court on or before that date.

**HELMER, CONLEY & KASSELMAN, P.A.**  
Attorneys for Plaintiff Angel L. Vera

By: \_\_\_\_\_

Samuel Reale, Jr., Esquire

Dated: December 30, 2019.