



JI-NJ-0001-0005

STANLEY C. VAN NESS
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By: Steven Zamrin
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - PASSAIC COUNTY
DOCKET NO. L8669-78

STATE OF NEW JERSEY)
(Office of the Public Defender,
Department of the Public Advocate))
IN THE INTEREST OF P.H., et. al.,)

Plaintiffs,)

vs.)

PASSAIC COUNTY BOARD OF CHOSEN
FREEHOLDERS, et. al.,)

Defendants.)

Civil Action

NOTICE OF MOTION FOR AN ORDER IN
AID OF LITIGANT'S RIGHTS

TO: CLERK OF THE COURT

Martin Verp, Esq.
Passaic County Counsel
317 Pennsylvania Avenue
Paterson, New Jersey 07503

SIRS:

PLEASE TAKE NOTICE that the undersigned attorney for the plaintiffs shall move before the Honorable Peter Ciolino, Assignment Judge, on July 16, 1982 at 9:00 a.m. or as soon thereafter as counsel may be heard, at the Court House, Paterson, New Jersey for an order in aid of litigant's rights declaring that the overcrowded condition at the Passaic County Detention Center is in violation of the order signed by Judge Joelson on December 11, 1978; directing that immediate efforts be made to reduce the population to the legal capacity as determined by the Department of Corrections;

establishing a specific schedule for the construction of a new detention center; and such other relief as the court may determine.

STANLEY C. VAN NESS
Public Defender
Attorney for Plaintiffs

By: Steven Zamrin
STEVEN ZAMRIN
Deputy Public Defender

Dated: June 29, 1982

Pursuant to R. 1:6-4 the original of the within motion was filed with the Clerk of the Superior Court in Trenton and a copy thereof was filed with the Clerk of Passaic County, 77 Hamilton Street, Paterson, New Jersey 07505.

Steven Zamrin
STEVEN ZAMRIN
Deputy Public Defender