

RESOLUTION NO. 2024-135

RESOLUTION OF THE TOWNSHIP OF LITTLE EGG HARBOR, COUNTY OF OCEAN, STATE OF NEW JERSEY, APPROVING CHARGES ASSOCIATED WITH THE DEMOLITION OF 110 NATIONAL UNION BLVD., PURSUANT TO CHAPTER 148 AND AUTHORIZING SAID CHARGE TO BECOME A LIEN AND TO BE ADDED TO AND BECOME A PART OF THE TAXES TO BE ASSESSED AND LEVIED ON SAID PROPERTY

WHEREAS, Chapter 148 of the Little Egg Harbor Township Code provides for the repair, closing and demolition of structures within the Township which are unsafe and unfit for human habitation; and

WHEREAS, in accordance with the terms of N.J.S.A. 40:48-2.4 et seq. and Chapter 148 of the Township Code, the Township provided notice and opportunity to the property owner of a hearing regarding the condition of the building and premise at 110 National Union Blvd., determined said building was unfit for human habitation, occupancy or use and issued an order setting forth the reasons for the decision and requiring the repair, alteration or improvement of said building or ordering its demolition if left in a state of disrepair; and

WHEREAS, said owner failed to comply with the order to repair or demolish;
and

WHEREAS, the Township filed a Verified Complaint in Superior Court of New Jersey, Chancery Division, Ocean County, Docket No. OCN-C-194-23 and the Honorable Mark A. Troncone, P.J.Ch., executed an Order dated March 1, 2024 attached hereto that the Township should act to abate the nuisance and that any and all funds expended to abate the nuisance shall become a Municipal Lien against the Defendant's real property; and

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WHEREAS, the Township has gone out to bid for proposals to demolish the building pursuant to said Court Order but desires to establish the associated costs of attorney fees incurred to obtain the Order to demolish as a lien prior to proceeding with demolition; and

WHEREAS, it is the desire of the Township to place liens against the property, to provide reimbursement to the Township for the partial costs of demolition as set forth herein in accordance with the terms of the Order and the Filed Affidavit of Services dated April 18, 2024.

NOW, THEREFORE, BE IT RESOLVED, by the governing body of the Township of Little Egg Harbor, County of Ocean, State of New Jersey as follows:

1. That the following charge based on the filed Affidavit of Services has been found to be correct and the cost as shown shall be charged against such property:

Block 325.26, Lot 30	110 National Union Blvd.	\$15,977.74
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The amount so charged shall forthwith become a lien upon such land and shall be added to and become a part of the taxes next to be assessed and levied upon such lands, the same to bear interest at the same rate as taxes and shall be collected and enforced by the Township of Little Egg Harbor Tax Collector.

2. That the Township Clerk is hereby authorized and directed to file a statement of the amount due the Township for the associated attorneys' fees as delineated on the Filed Affidavit of Services for the costs allowed by the Court in seeking demolition, along with a copy of this Resolution, with the Tax Collector of the Township of Little Egg Harbor.

3. That the Tax Collector shall file, by registered mail, with the owners of said property and parties in interest a copy of the municipal lien certificate.

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CERTIFICATION

I, **KELLY LETTERA, CMC, RMC**, Municipal Clerk of the Township of Little Egg Harbor do hereby certify that the foregoing resolution was duly adopted by the Township of Little Egg Harbor Township Committee at a meeting held on this **9th** day of **May, 2024**.



KELLY LETTERA, CMC, RMC
Township Clerk
Little Egg Harbor Township

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ROTHSTEIN, MANDELL, STROHM, HALM & CIPRIANI, P.A.

Danielle A. Rosiejka, Esq. Attorney ID No.: 022982012

98 East Water Street

Toms River, New Jersey 08753

Attorney for Plaintiff, Township of Little Egg Harbor

TOWNSHIP OF LITTLE EGG HARBOR, Plaintiff, v. ARTURO CAMPOS A/K/A ARTURO CAMPOS DIAZ; RICHARD LEONARDIS; JOHN AND JANE DOES 1-10; ABC LLC's 1-10; and ZYZ CORPS 1-10. Defendants.	SUPERIOR COURT OF NEW JERSEY OCEAN COUNTY CHANCERY DIVISION DOCKET NO. OCN-C-194-23 CIVIL ACTION AFFIDAVIT OF SERVICES
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I, DANIELLE A. ROSIEJKA, ESQ., being of full age certify as follows:

1. I am an Associate with the law firm of Rothstein, Mandell, Strohm, Halm & Cipriani, P.A., attorneys for the Plaintiff, Township of Little Egg Harbor. As such, I am fully familiar with the facts and circumstances surrounding this matter.

2. This office has performed legal services in accordance with the following:

9/6/2022	Receipt and review of photos and inspector report, created filed and saved same to file. (DAR) .5
9/6/2022	Receipt and review of email correspondence from Township and drafted email responding to same. (DAR) .5
10/21/2022	Receipt and review of email correspondence from Title Company with enclosure and drafted reply correspondence. (DAR) .5

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10/21/2022	Drafted correspondence enclosing payment regarding title search. (DAR)	.5
10/25/2022	Draft email correspondence to Tax Assessor confirming outstanding tax certificates. (DAR)	.3
10/28/2022	Receipt and review of email correspondence from tax collector and drafted email correspondence responding to same. (DAR)	.5
11/7/2022	Receipt and review of email correspondence from M. Fromosky and drafted reply correspondence. (DAR)	.5
11/7/2022	Receipt and review of updated pictures and violation notices and saved same to file. (DAR)	.5
11/7/2022	Review of foreclosure complaint filed on 5/24/22 F-5123-22 from Trystone Capital Assets; and US Bank Cust filed on 8/31/22 under F-9119-22. (DAR)	.3
11/7/2022	Draft email correspondence to D. Cook and receipt and review of email correspondence responding to same regarding open liens. (DAR)	.5
11/7/2022	Review of title search to identify interested parties. (DAR)	.5
11/7/2022	Drafted email correspondence to M. Fromosky, receipt and review of email correspondence responding to same and drafted reply correspondence regarding new hearing date. (DAR)	.4
11/9/2022	Receipt and review of email correspondence from M. Fromosky. (DAR)	.2
11/14/2022	Phone call with M. Fromosky. (DAR)	.2
11/14/2022	Draft email correspondence to M. Fromosky and K. Held re: hearing. (DAR)	.1
12/16/2022	Receipt and review of email correspondence from M. Fromosky with multiple enclosures. (DAR)	.3
12/16/2022	Receipt and review of inspection violation notice dated 12/16/22 and updated pictures and saved same to file. (DAR)	.5
12/29/2022	Receipt and review of correspondence from Township Administrator regarding lien holder letter. (MSA)	.3

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12/29/2022	Draft correspondence to Township Administrator. (MSA)	.2
1/2/2023	Receipt and review of correspondence from Leonardis regarding intent to foreclose. (DAR)	.2
1/11/2023	Receipt and review of correspondence from Richard Leonardis. (DAR)	.2
1/12/2023	Reviewed file in preparation for Little Egg meeting. (DAR)	.2
1/31/2023	Receipt and review of email correspondence from M. Fromosky with multiple enclosures. (DAR)	.2
1/31/2023	Receipt and review of updated photos and inspection violation notice. (DAR)	.3
3/9/2023	Drafted summary of property status and emailed same to MSA for Township meeting. (DAR)	.2
3/29/2023	Receipt and review of email correspondence from M. Fromosky with enclosures and drafted email correspondence responding to same. (DAR)	.5
3/29/2023	Receipt and review of updated photos and violation notice. (DAR)	.3
4/11/2023	Interoffice conference with MSA regarding property status. (DAR)	.2
4/27/2023	Receipt and review of email correspondence from M. Fromosky with enclosures and drafted email correspondence responding to same. (DAR)	.5
4/27/2023	Receipt and review of updated violation notice, inspection notice and pictures of property and saved same to file. (DAR)	.4
6/6/2023	Receipt and review of email correspondence from M. Fromosky and drafted reply correspondence. (DAR)	.5
6/6/2023	Receipt and review of updated inspection and violation notice from 6/6/23 and updated photos. (DAR)	.3
9/11/2023	Draft correspondence to M. Fromosky; receipt and review of email correspondence responding to same and drafted reply correspondence regarding availability for administrative hearing. (DAR)	.2
9/12/2023	Draft email correspondence to tax collector inquiring about open tax liens on the property. (DAR)	.3
9/12/2023	Review of title report and draft service list. (DAR)	1.0

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9/12/2023	Researched probate records available from Ocean County Surrogate's owner of property and researched property records regarding same. (DAR)	1.2
9/12/2023	Draft correspondence to R. Leonardis, tax certificate owner noticing administrative hearing. (DAR)	.5
9/12/2023	Draft correspondences to Campos/Estate at several different addresses noticing administrative hearing. (DAR)	1.0
9/13/2023	Draft email correspondence to tax collector. (DAR)	.3
9/13/2023	Receipt and review of email correspondence from M. Fromosky and drafted email correspondence responding to same. (DAR)	.2
9/15/2023	Receipt and review of certified mail receipts. (DAR)	.2
9/20/2023	Draft notice of publication for administrative hearing (DAR)	.7
9/21/2023	Receipt and review of unclaimed certified and regular mail on Nereyda Campos at property address. (DAR)	.4
9/21/2023	Filled out required form for change of address request. (DAR)	.3
9/21/2023	Draft letter to postmaster requesting change of address information. (DAR)	.5
9/26/2023	Draft email correspondence to Asbury Park Press; receipt and review of email correspondence responding to same with enclosed proof; review of enclosed proof; draft email correspondence approving same; receipt, review and response to various email correspondences related to same regarding publication request. (DAR)	1.0
10/3/2023	Receipt and review of email correspondence from Asbury Park Press with enclosures. (DAR)	.2
10/3/2023	Receipt and review of affidavit of publication for administrative hearing and saved same to file. (DAR)	.2
10/3/2023	Receipt and review of correspondence from postmaster on Nereyda Campos at 913 Jamaica Blvd. indicating "moved left no forwarding address." (DAR)	.2
10/3/2023	Prepared required form for postmaster for new address of N. Campos. (DAR)	.2

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10/3/2023	Draft letter to postmaster requesting change of address for new address at 913 Jamaica. (DAR)	.5
10/6/2023	Phone call with R. Leonardis. (DAR)	.3
10/6/2023	Draft email correspondence to R. Leonardis regarding his plan for the property. (DAR)	.3
10/6/2023	Research and review of pleadings under foreclosure docket F-13488-22 regarding status of foreclosure. (DAR)	.4
10/6/2023	Draft email correspondence to M. Fromosky, receipt and review of email correspondence responding to same and drafted reply correspondence regarding status of property. (DAR)	.8
10/10/2023	Receipt and review of email correspondence from tax lien holder, Richard Leonardis, and drafted email correspondence responding to same. (DAR)	.5
10/10/2023	Receipt and review of email correspondence from M. Fromosky with multiple enclosures. (DAR)	.2
10/10/2023	Receipt and review of updated violation notice and photos and saved same to file. (DAR)	.4
10/11/2023	Receipt and review of email correspondence from K. Held and draft email correspondence responding to same relating to upcoming administrative hearing. (DAR)	.2
10/12/2023	Review matter relating to demolition in preparation for meeting. (DAR)	.2
10/12/2023	Review of file and draft summary to MSA on property status in preparation for Township meeting. (DAR)	.2
10/16/2023	Draft email correspondence to Township and receipt and review of email correspondence responding to same regarding administrative hearing. (DAR)	.2
10/16/2023	Review of file in preparation for administrative hearing. (DAR)	.5
10/17/2023	Travel to and back from Little Egg Harbor regarding administrative hearing. (DAR)	.4
10/17/2023	Attended administrative hearing. (DAR)	.5

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10/18/2024	Receipt and review of correspondence from post office advising no change of address for 913 Jamaica. (DAR)	.2
10/18/2023	Receipt and review of email correspondence from M. Fromosky with enclosures and draft reply correspondence to same regarding hearing. (DAR)	.2
10/19/2023	Phone call from Miriam Arminio regarding notices to N. Campos. (DAR)	.5
10/19/2023	Receipt and review of email correspondence from N. C. (DAR)	.2
10/20/2023	Research on property owner Arturo Campos. (DAR)	.3
10/23/2023	Research Atlantic County and Camden County records search for property owner. (DAR)	.7
10/23/2023	Draft email correspondence to M. Fromosky with enclosures regarding demolition property. (DAR)	.1
10/23/2023	Review of file and notes from administrative opinion and draft administrative opinion. (DAR)	.8
10/24/2023	Receipt and review of email correspondence from M. Fromosky with enclosures; drafted reply correspondence; and receipt and review of email correspondence responding to same regarding administrative opinions. (DAR)	.4
10/24/2023	Receipt and review of signed administrative opinion, finalized and executed same. (DAR)	.5
10/25/2023	Receipt, review and response to various email correspondences with Township regarding demolition. (DAR)	1.0
10/25/2023	Review of file and draft email correspondence to Township regarding demolition. (DAR)	.4
10/31/2023	Receipt and review of email correspondence from M. Fromosky with enclosures. (DAR)	.2
10/31/2023	Receipt and review of updated photos and violation notice for October 31 st inspection of the property; saved same to file. (DAR)	.3
11/6/2023	Draft correspondence to property owners x2 enclosing administrative opinion. (DAR)	1.0
11/6/2023	Continued research on A. Campos owner of property. (DAR)	.5
11/6/2023	Draft notice of publication of opinion. (DAR)	.7

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11/7/2023	Draft email correspondence to M. Fromosky with enclosure. (DAR)	.3
11/7/2023	Receipt and review of invoice for publication and draft email correspondence to APP approving publication regarding publication of opinion. (DAR)	.4
11/7/2023	Receipt and review of email correspondence from Asbury Park Press with enclosed order confirmation and proof of add; review of enclosures and draft email correspondence responding to same regarding Notice of Publication. (DAR)	.5
11/7/2023	Draft email correspondence to Asbury Park Press with enclosures and review of email correspondence responding to same regarding request for publication. (DAR)	.5
11/7/2023	Receipt and review of certified mail receipts. (DAR)	.2
11/9/2023	Review of file and drafted summary for MSA for Township Meeting. (DAR)	.3
11/15/2023	Receipt and review of correspondence from M. Fromosky and drafted reply correspondence. (DAR)	.5
11/17/2023	Receipt and review of email correspondence from M. Fromosky with enclosures and drafted reply correspondence. (DAR)	.5
11/17/2023	Receipt and review of photos of posted notice, updated violation notice and inspection and saved same to file. (DAR)	.3
11/21/2023	Receipt and review of email correspondence from Asbury Park Press with enclosure regarding Affidavit of Publication. (DAR)	.2
11/21/2023	Receipt and review of Affidavit of Publication and saved same to file. (DAR)	.2
12/13/2023	Review of file and began drafting Order to Show Cause. (DAR)	1.5
12/13/2023	Draft proposed Order. (DAR)	.5
12/13/2023	Research on e-courts and status of tax foreclosure; review of recently filed motions. (DAR)	.8
12/14/2023	Compiled supporting exhibits to Complaint and Certifications; revised supporting photos to comport with size requirements for e-filing. (DAR)	1.0

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12/14/2023	Draft email correspondence to M. Fromosky with enclosures; receipt, review and response to multiple email correspondences responding to same. (DAR)	1.0
12/14/2023	Draft supporting certification of M. Fromosky. (DAR)	1.5
12/14/2023	Draft legal brief in support of demolition and certification. (DAR)	2.5
12/14/2023	Review of file and draft Complaint for demolition. (DAR)	3.0
12/14/2023	Draft verification for M. Fromosky. (Dar)	.3
12/15/2023	Finalized pleadings, Complaint, Certification, Exhibits, Brief, Order to Show Cause and proposed Order and filed same on JEDS. (DAR)	.7
12/15/2023	Receipt and review notice from JEDS filing has been successfully submitted. (DAR)	.2
12/15/2023	Receipt and review notice from JEDS regarding Complaint uploaded by Case Management Staff. (DAR)	.2
12/15/2023	Receipt and review of notice from JEDS assigning docket number. (DAR)	.2
12/15/2023	Receipt and review of notice from JEDS filing has been processed by court and a case number has been assigned. (DAR)	.2
12/15/2023	Review and finalized certification of M. Fromosky. (DAR)	.5
12/19/2023	Receipt and review notice from eCourts regarding notice of filing by Superior Court. (DAR)	.2
12/19/2023	Receipt and review of signed Order to Show Cause. (DAR)	.2
12/19/2023	Receipt and review notice from eCourts Online regarding Order to Show Cause submitted by Court. (DAR)	.2
12/20/2024	Receipt and review notice from eCourts Online regarding notice of filing by Superior Court. (DAR)	.2
12/20/2024	Receipt and review notice from Superior Court motion filed on 12/15/23 carried to 1/26/24. (DAR)	.2
12/21/2023	Draft letter to Leonardis enclosing filed Order to Show Cause and Complaint. (DAR)	.5

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12/21/2023	Draft email correspondence to Guaranteed with enclosure and receipt and review of email correspondence responding to same regarding request for personal service on Leonardis. (DAR)	.5
12/21/2023	Draft letter to Arturo Campos enclosing filed Order to Show Cause and Complaint (DAR)	.5
12/21/2023	Draft email correspondence to Guaranteed with enclosure and receipt and review of email correspondence responding to same regarding request for personal service on Arturo. (DAR)	.5
12/21/2023	Draft email correspondence to M. Fromosky with enclosure and receipt and review of email correspondence responding. (DAR)	.5
12/21/2023	Draft letter to the Judge enclosing courtesy copy of pleadings. (DAR)	.2
12/28/2023	Receipt and review of email correspondence from Guaranteed with enclosure. (DAR)	.2
12/28/2023	Receipt and review of affidavit of nonservice on R. Leonardis. (DAR)	.2
1/2/2024	Receipt and review of message from tax sale lien holder. (DAR)	.2
1/2/2024	Phone call to tax sale lien holder and left message. (DAR)	.2
1/4/2024	Receipt and review of email correspondence from Guaranteed. (DAR)	.2
1/4/2024	Receipt and review of email correspondence from Guaranteed with enclosures. (DAR)	.2
1/4/2024	Receipt and review of affidavit of no service from Guaranteed regarding Arturo. (DAR)	.2
1/4/2024	Receipt and review of affidavit of no service from Guaranteed regarding Leonardis. (DAR)	.2
1/4/2024	Receipt and review of email correspondence from Guaranteed with enclosure regarding Leonardis. (DAR)	.2
1/4/2024	Receipt and review of invoice from attempted service on Leonardis. (DAR)	.2
1/11/2024	Draft letter to the court requesting adjournment to allow service by publication. (DAR)	.5

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1/11/2024	Filed letter on JEDS and receipt and review of eCourt notices confirming filing of same. (DAR)	.3
1/12/2024	Draft correspondence to tax sale holder with enclosures. (DAR)	.5
1/12/2024	Draft email correspondence to Guaranteed with enclosures and receipt and review of email correspondence and fax confirming receipt of same. (DAR)	.7
1/15/2024	Draft notice of publication for order to show cause. (DAR)	1.0
1/15/2024	Review of invoice and draft letter enclosing payment to Guaranteed. (DAR)	.5
1/19/2024	Receipt and review of fax from Richard Leonardis with enclosure. (DAR)	.2
1/19/2024	Receipt and review of letter brief from Richard Leonardis objecting to demolition filed with the court. (DAR)	.5
1/19/2024	Receipt and review of notice from eCourts Online regarding notice of filing by Superior Court. (DAR)	.2
1/19/2024	Receipt and review notice from Superior Court regarding setting new date for hearing for March 1, 2024. (DAR)	
1/22/2024	Receipt and review of various correspondences from Guaranteed advising of successful service on tax lien holder. (DAR)	.4
1/23/2024	Revised publication notice to reflect new dates. (DAR)	.3
1/23/2024	Draft email correspondence to Asbury Park Press with enclosure regarding request for publication. (DAR)	.3
1/24/2024	Receipt and review of email correspondence from Asbury Park Press with enclosures; review of order confirmation, review of invoice; review of proposed proof; revised proof; draft email correspondence responding to same and receipt/review and response to various email correspondences regarding publication.	1.2
1/25/2024	Receipt and review of email correspondence from Guaranteed with enclosures. (DAR)	.2
1/25/2024	Receipt and review of invoice from Guaranteed for successful service on tax sale holder. (DAR)	.2
1/25/2024	Receipt and review of affidavit of service reflecting successful service of order to show cause and complaint on Leonardis. (DAR)	.2

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1/25/2024	Filed affidavit of service on eCourts and receipt and review of various eCourt notices confirming filing of same. (DAR)	.5
2/5/2024	Receipt and review of email correspondence from Asbury Park Press with enclosures; review of enclosed invoice for publication; review of affidavit of publication and saved same to file. (DAR)	.6
2/23/2024	Receipt and review of invoice from Guaranteed regarding service of Order to Show Cause and Complaint. (DAR)	.2
2/26/2024	Receipt and review of correspondence from tax sale holder with enclosures. (DAR)	.2
2/26/2024	Receipt and review of tax sale holder's Answer to Complaint and opposition to Order to Show Cause. (DAR)	1.0
2/26/2024	Research on statutory requirements and case law related to demolition in preparation for demolition proceedings. (DAR)	1.0
2/26/2024	Research on Tax Sale Law, statutes and case law. (DAR)	2.5
2/26/2024	Research objections to demolition by tax sale holder filed by R.L. (DAR)	1.5
2/26/2024	Began drafting legal brief in opposition to RL's opposition. (DAR)	3.0
2/27/2024	Continued drafting legal brief in response to opposition. (DAR)	2.0
2/27/2024	Compiled supporting exhibits to reply brief. (DAR)	1.0
2/27/2024	Filed reply brief on the Judiciary's electronic document submission portal; receipt and review of various eCourt notifications confirming filing of same. (DAR)	.5
2/27/2024	Draft email correspondence to R. Leonardis with enclosure. (DAR)	.3
2/28/2024	Draft email correspondence to R. Leonardis regarding hearing. (DAR)	.3
2/28/2024	Phone call with Judge Troncone's law clerk regarding hearing. (DAR)	.2
2/28/2024	Filed affidavit of service with court and receipt and review of various eCourt notifications. (DAR)	.4
2/28/2024	Receipt and review notice from Superior Court regarding motion hearing scheduled at 8:59 a.m. before Judge Troncone. (DAR)	.2

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2/28/2024	Receipt and review notice from eCourts Online regarding notice of filing by Superior Court. (DAR)	.2
2/28/2024	Receipt and review of email correspondence from Defendant Leonardis; draft email correspondence responding to same and receipt and review of reply correspondence regarding adjournment request and status of property. (DAR)	.8
2/28/2024	Compiled exhibits in support of affidavit regarding establishing substitute service on Defendant Campos. (DAR)	1.0
2/28/2024	Draft affidavit of diligent inquiry for Defendant Arturo Campos. (DAR)	2.0
2/28/2024	Review of file including all correspondence, returned mail, change of address information, affidavit of services in preparation for affidavit of diligent inquiry for Defendant Arturo Campos. (DAR)	1.5
2/29/2024	Research on new supreme court case regarding tax sale foreclosures. (DAR)	.4
2/29/2024	Review of file, pleadings, filed opposition and service in preparation for oral argument regarding hearing before Judge Troncone. (DAR)	1.0
2/29/2024	Phone call from Judge Troncone's law clerk regarding hearing. (DAR)	.3
2/29/2024	Receipt and review of email correspondence from law clerk enclosing link for hearing and draft email correspondence responding to same. (DAR)	.5
2/29/2024	Receipt and review of email correspondence from R. Leonardis advising he is no longer seeking an adjournment; draft email correspondence responding to same regarding hearing on Friday. (DAR)	.5
2/29/2024	Research as to FEMA substantial improvement and regulations. (MSA)	1.2
2/29/2024	Interoffice conference with MSA regarding update on demolition cases. (DR)	.2
3/01/2024	Review of file in preparation for court appearance and appeared before Judge Troncone on Order to Show Cause hearing	1.0
3/05/2024	Receipt and review of demolition order from court; draft email correspondences to administrator summarizing hearing and enclosing order; draft letters to property owners enclosing copy of order; draft email correspondence to code enforcement requesting to post notice on door; draft correspondence to administration notifying of demolition order (DR)	1.5

r|m|s|h|c

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EXPENSES

10/21/2022	Title search/report for 110 National Union Blvd.	\$385.00
9/15/2023	Certified mail receipts	\$25.68
9/26/2023	Fee for Publication of Notice of Hearing in Asbury Park Press	\$64.92
11/6/2023	Certified mail receipts	\$17.12
11/7/2023	Fee for Publication of Administrative Opinion	\$65.80
12/15/2023	Filing fee for Order to Show Cause/Complaint	\$300.00
1/4/2024	Fee for attempted service on Leonardis	\$60.00
1/15/2024	Fee for attempted service of Order to Show Cause	\$63.70
1/24/2024	Fee for Publication of Notice of Order to Show Cause	\$120.52
1/25/2024	Fee for successful service of OTSC on Leonardis	\$85.00
2/23/2024	Fee for service of Complaint regarding lien holder	\$85.00

Total: **\$1,272.74**

Total Hours (Danielle A. Rosiejka, Esq.) 91.9 hours x \$160 = \$14,705.00

TOTAL COMBINED HOURS: **\$14,705.00**

TOTAL EXPENSES: **\$1,272.74**

TOTAL AMOUNT DUE: **\$15,977.74**

r|m|s|h|c

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I certify that the foregoing statements made by me are true. I am aware that if anything is willfully false, I am subject to punishment.

ROTHSTEIN, MANDELL, STROHM,
HALM & CIPRIANI, P.A.

By: Danielle A. Rosiejka
DANIELLE A. ROSIEJKA

Dated: 4/18/24

ROTHSTEIN, MANDELL, STROHM, HALM & CIPRIANI, P.A.

Danielle A. Rosiejka, Esq. Attorney ID No.: 022982012

98 East Water Street

Toms River, New Jersey 08753

Attorney for Plaintiff, Township of Little Egg Harbor

<p>TOWNSHIP OF LITTLE EGG HARBOR,</p> <p>Plaintiff,</p> <p>v.</p> <p>ARTURO CAMPOS A/K/A ARTURO CAMPOS DIAZ; RICHARD LEONARDIS; JOHN AND JANE DOES 1-10; ABC LLC's 1-10; and ZYZ CORPS 1-10.</p> <p>Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, OCEAN COUNTY</p> <p>DOCKET NO. OCN-C- 194-23 CIVIL ACTION</p> <p style="text-align: center;">ORDER</p>
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THIS MATTER being brought before the Court by Danielle A. Rosiejka, Esq. on behalf of the law firm of Rothstein, Mandell, Strohm, Halm & Cipriani, P.A., attorney for Plaintiff, Township of Little Egg Harbor, seeking relief by way of summary action pursuant to N.J. Ct. R. 4:67- 1(a). Based upon the facts set forth in the verified complaint filed herewith and the Court having determined that this matter may be commenced by order to show cause as a summary proceeding pursuant to N.J. Ct. R. 4:52 and the court having established a return date of March 1st ,2024 and having reviewed such evidence and heard such testimony as deemed necessary and appropriate.

IT IS ON THIS 1st day of March, 2024;

ORDERED that the court finds the Defendant's property is a continuing public nuisance and is a danger to the health safety and welfare of the members of the Township of Little Egg Harbor and must be immediately abated; and it is further



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ORDERED that the Plaintiff is hereby granted access on and over the Defendant's property, located at 110 National Union Blvd in Little Egg Harbor Township, New Jersey, for the purpose of demolishing the structure to cure and abate the public nuisance; and it is further

ORDERED that the Plaintiff shall cure and abate the condition at the Defendant's property between the hours of 9:00 am and 4:00 p.m. on any weekday, Monday through Friday after first having served this order on the Defendant; and it is further

ORDERED that Pursuant to N.J.S.A. 40:48-2.12(f) the Township is acting as set forth in the Verified Complaint to expend public funds to abate the nuisance on the Defendant's property. Upon the completion of such action / abatement by the Plaintiff any and all funds expended by the Plaintiff to abate the nuisance shall become a Municipal Lien against the Defendant's real property; and it is further

ORDERED that copies of this Order be served upon all parties within seven (7) days of the date herein.

Mark A Tronccone

HON. MARK A. TRONCONE, P.J.Ch.

r|m|s|h|c

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(X) Opposed
() Unopposed