

LAW OFFICE OF

**EDWARD L. PAUL, P.C.**

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**EDWARD L. PAUL, ESQUIRE\***

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December 2, 2020

*Via Electronic Mail to [rfrank@willingboronj.gov](mailto:rfrank@willingboronj.gov)*

Reyan Frank, Township Clerk

Township of Willingboro

1 Rev. Dr. Martin Luther King Drive

Willingboro, NJ 08046

Re: Application of NE Willingboro LLC/The Grand Marketplace  
Short Term Trailer Storage Facility

Dear Ms. Frank:

I represent Willingboro Urban Renewal Partners, LP, the owner of the Doreatha D. Campbell Senior Housing Complex which is located at 55 Sunset Road.

My client intends to object to the application of NE Willingboro LLC/The Grand Marketplace for a hearing this evening via Zoom. I am writing to request information on the manner that I can present exhibits to the Board.

I am able to share these documents on the screen through Zoom, but I wanted to make sure that the Board will allow this. I am also providing PDF copies with this correspondence.

The first exhibit is a survey of my client's property which is known as Block 2, Lot 7.04.

Section 370-82A(7) provides that the applicant must submit "the location of existing or proposed structures within the tract and within 100' of the tract." Since my client's building is within 20.5 feet of the property line, it is submitted that the site plans are inadequate for the Board to consider this application. I am providing a copy of my client's survey to show the Board the various areas of ingress and egress on my client's property which are not addressed in the application.

I am also enclosing a copy of an easement that was given by the prior owner of the applicant's real property. That easement provides my client with access over any paved surfaces of applicant for ingress and egress on Sunset Road, for motor vehicles and pedestrians. I

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intend to utilize the survey to show the Board areas where applicant intends to preclude access by motor vehicles, pedestrians and emergency equipment that is otherwise permitted pursuant to the easement.

I am also attaching copies of petitions that were provided to the Township of Willingboro by residents of the Doreatha D. Campbell Senior Housing Complex . These residents are senior citizens that wish to be heard, but are unfamiliar with or do not have access to Zoom technology. With COVID restrictions, there is nowhere in the senior citizen complex that can accommodate a number of residents.

I intend to offer Barry Sharer who is the President of the General Partner of the owner for testimony this evening. I would also like the opportunity to cross examine any witnesses presented by the applicant.

Please advise whether you require these exhibits in some other format. I am also providing the link to these documents below due to the size of same.

Thank you for your kind consideration and attention to this matter.

Very truly yours,



EDWARD L. PAUL, ESQUIRE

ELP/vb

cc: Matthew B. Wieliczko, Esquire (via email with enclosures)  
Clint B. Allen, Esquire (via email with enclosures)  
Willingboro Urban Renewal Partners, LP