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June 22, 2017

HAND-DELIVERED VIA COURIER

Honorable Douglas Hurd, P.J.Cv.

Superior Court of New Jersey

Mercer County Civil Courthouse

175 South Broad Street

Trenton, New Jersey 08650

Re: I/M/O Tp. of South Brunswick

Consolidated Docket Nos.: L-3878-15; L-2635-16; L-2638-16; L-3669-14; L-2633-16; L-3878-15; L-4580-16

Dear Judge Hurd,

When South Brunswick Township filed its Motion to Vacate Judge Wolfson's Opinions and Orders in the above-referenced consolidated matters on March 28, 2017, we supplied facts based primarily upon public records available to us at that time. Since then, the Township discovered additional documents that provide additional facts directly pertinent to the motion. More specifically:

1. We recently secured the 2013, 2014, and 2015 Financial Disclosure Reports filed by Mrs. Wolfson, a distinguished federal jurist, revealing that **Mr. and Mrs. Wolfson enjoyed *thirteen* (13) Edgewood-funded vacations while Mr. Wolfson was presiding over numerous Mount Laurel matters in Middlesex County, including the matter involving South Brunswick. See Supplemental Certification of Michael A. Jedziniak, Esq., dated June 21, 2017, at Exhibits A, B, and C. With these 13 vacations, the total count of reported vacations of which we are aware is 26.**

2. We also recently secured the 2013, 2014, and 2015 Financial Disclosure Reports filed by Judge Douglas Wolfson revealing that, he disclosed none of the vacations that his wife appropriately disclosed. Id. at Exhibits D, E, and F.

3. The recent discovery of the Edgewood-funded vacations in 2015 reveals that the Wolfsons vacationed at this developer's expense in November of 2015. Four days after returning from vacation, Judge Wolfson **radically altered his previously-established deadlines and procedures in the South Brunswick**


matter, much to the detriment of the citizens of this community. Id. at Exhibit C; see also the initial moving Certification of Donald Sears, Esq., dated March 28, 2017, at para. 8 through 17 (setting forth the radical change in course occurring right after Judge Wolfson's November 2015 vacation).

Although our moving papers provided more than sufficient facts to satisfy the "appearance of impartiality" standard, these new facts are obviously relevant to the decision the Court will need to make and we wanted to present them well in advance of the return date of the motion. In addition to furnishing this new information, we have enclosed a visual aid to facilitate the Court's understanding of the information presented by displaying a number of the more significant facts on a time line.

Notwithstanding these newly-discovered facts, it bears repetition and emphasis that the Township is not trying to prove that Judge Wolfson violated any ethical standards. Nor is it questioning the impeccable judicial integrity of Mrs. Wolfson, or accusing Brian Wolfson, Jack Morris, or Sheryl Weingarten-Morris of any wrongdoing whatsoever. To the contrary, the sole issue in this motion is whether the facts presented could cause a reasonable, fully-informed person to doubt or question Judge Wolfson's impartiality vis-à-vis South Brunswick. These new facts will assist this Court in deciding that narrow issue.

Thank you for your consideration of this letter and enclosures.

Respectfully submitted,


Jeffrey R. Surenian

Enclosures

cc: Supreme Court and South Brunswick Service Lists (*via electronic and/or regular mail*)