

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

THE ISLAMIC SOCIETY OF BASKING RIDGE  
and MOHAMMAD ALI CHAUDRY,

Case No. 16 Civ. 1369 (MAS)(LHG)

*Plaintiffs,*

v.

TOWNSHIP OF BERNARDS, BERNARDS  
TOWNSHIP PLANNING BOARD, BERNARDS  
TOWNSHIP COMMITTEE, BARBARA  
KLEINERT, in her official capacity, JEFFREY  
PLAZA, in his official capacity, JIM  
BALDASSARE, in his official capacity, JODI  
ALPER, in her official capacity, JOHN MALAY, in  
his official capacity, KATHLEEN “KIPPY”  
PIEDICI, in her official capacity, LEON HARRIS,  
in his official capacity, PAULA AXT, in her official  
capacity, RANDY SANTORO, in his official  
capacity, RICH MOSCHELLO, in his official  
capacity, SCOTT ROSS, in his official capacity,  
CAROL BIANCHI, in her official capacity,  
CAROLYN GAZIANO, in her official capacity,  
THOMAS S. RUSSO, JR., in his official capacity,  
and JOHN CARPENTER, in his official capacity,

*Defendants.*

**PLAINTIFFS’ FIRST SET OF REQUESTS FOR THE PRODUCTION OF  
DOCUMENTS AND THINGS TO DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs Islamic Society of Basking Ridge (“ISBR”) and Mohammad Ali Chaudry (together, “Plaintiffs”) direct the following requests for production of documents and things to Defendants Township of Bernards, Bernards Township Planning Board, Bernards Township Committee, Barbara Kleinert, Jeffrey Plaza, Jim Baldassare, Jodi Alper, John Malay, Kathleen “Kippy” Piedici, Leon Harris, Paula Axt, Randy Santoro, Rich Moschello, Scott Ross, Carol Bianchi, Carolyn Gaziano,

Thomas S. Russo, Jr., and John Carpenter (collectively “Defendants”), and request that within 30 days after service of these requests or such earlier time as the Plaintiffs and the Defendants may agree or the Court may order, the Defendants produce responsive documents for inspection and copying at the offices of Patterson Belknap Webb & Tyler LLP, 1133 Avenue of the Americas, New York, New York 10036.

### **DEFINITIONS AND INSTRUCTIONS**

1. The terms “Defendants,” “You,” or “Your” refer to all Defendants, and any and all predecessors and successors in interest, affiliates, divisions or departments, agents, representatives, officers, employees, committees, accountants, consultants, contractors, advertising or marketing agencies, and all persons or entities acting or purporting to act on behalf of or under the control of any Defendant.

2. The term “document” is used in the broadest sense consistent with Rule 34(a) of the Federal Rules of Civil Procedure. The term includes, without limitation, any written, recorded, transcribed, taped, photographic, videographic or graphic matter, any electronically, magnetically or digitally stored information, including, without limitation, any communication, voice mail, text message, instant or electronic message, electronic mail, social media posting, software, source code, object code or hard or floppy disc files, any other tangible things, and all copies of any of the foregoing that are different in any way from the original.

3. “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive; use of a singular noun shall be construed to include the plural noun and use of a plural noun shall be construed to include the singular noun; the use of a verb in any tense shall be construed as the use of that verb in all other

tenses whenever necessary to bring within the scope of the requested documents that which might otherwise be construed to be outside its scope.

4. “Board” means the Bernards Township Planning Board.

5. “Board Member” means anyone who was a member of the Board at any time during the pendency of the ISBR Application.

6. “Board Professional” means anyone who served as an expert or professional assisting the Board at any time during the pendency of the ISBR Application, including David Schley, David Banisch, Thomas Quinn, Jonathan Drill, and Janet Lake.

7. “Committee” means the Bernards Township Committee.

8. “Committee Member” means anyone who was a member of the Committee at any time during the pendency of the ISBR Application.

9. “Complaint” means Plaintiffs’ Complaint in this action, filed on March 10, 2016 (or any subsequently-filed amendments to the Complaint).

10. “Concerning” means relating to, referring to, arising from, describing, evidencing, or constituting.

11. “Including” means “including but not limited to.”

12. “ISBR Application” means ISBR’s application to the Board seeking preliminary and final site plan approval to construct a mosque at 124 Church Street, including amendments and revisions thereto, which was filed on April 20, 2012 and for which preliminary and final site plan approval was denied in a Board resolution dated January 19, 2016.

13. “ISBR Proceeding” means all proceedings before the Board concerning the ISBR Application, including public hearings and any other meetings or communications,

whether formal or informal, public or non-public, that took place between November 9, 2011 and the present.

14. “Ordinance # 2242” means Bernards Township Ordinance # 2242, which was passed by the Committee on October 15, 2013.

15. “Township” means Township of Bernards.

16. “Township Defendants” means the Township, the Board, and the Committee.

17. If You believe that a responsive document is privileged or otherwise excluded from discovery, You are requested to specify the basis of the privilege or other grounds for exclusion and to provide all other appropriate information as required by Rules 26(b)(5) and 34(b)(2)(B) of the Federal Rules of Civil Procedure. Provide responsive documents to all parts of the Request to which You do not object.

18. If You cannot produce responsive documents to any of these Requests in full, produce documents to the extent possible, specifying the reasons for Your inability to produce documents in full and provide responsive documents to the remainder.

19. In producing documents responsive to these Requests, furnish all information that is available to You, including documents in the possession of Your agents, employees, or attorneys, or otherwise subject to Your possession, custody, or control.

20. If a responsive document was, but no longer is, within Your possession, custody, or control, please state the following in detail:

- (a) the type of document and the author(s), sender(s), recipient(s), and copyee(s) of the document;
- (b) a summary of the contents of the document;
- (c) what disposition was made of such document;
- (d) the date of such disposition;

- (e) whether the original or a copy thereof is within the possession, custody, or control of any other person; and
- (f) if the answer to (e) is affirmative, the identity of such person.

21. Pursuant to Fed. R. Civ. P. 34(b), You shall produce responsive documents as they have been kept in the usual course of business or shall organize and label them to correspond to the enumerated requests of this demand. If You have no documents responsive to a particular category, You shall so state in writing.

22. These definitions and instructions, and the requests set forth below, apply equally to all forms of electronic communications, including e-mails, and to all other tangible things.

23. You shall take immediate steps to preserve all documents responsive to these requests, including electronic data that may exist on backup and/or other archived electronic computerized data compilations. These measures include, but are not limited to, discontinuation of all data destruction and backup tape recycling policies applicable to such documents.

24. The Requests should be deemed continuing and the responses to them must be supplemented pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

25. Unless otherwise specified, the relevant time period for all requests is November 9, 2011 to the present.

## **DOCUMENT REQUESTS**

### **DOCUMENT REQUEST NO. 1**

All documents concerning Plaintiffs ISBR or Dr. Chaudry.

### **DOCUMENT REQUEST NO. 2**

All documents concerning the ISBR Application.

**DOCUMENT REQUEST NO. 3**

All videos and transcripts of the ISBR Proceeding.

**DOCUMENT REQUEST NO. 4**

All drafts of the Board’s January 19, 2016 resolution denying the ISBR Application.

**DOCUMENT REQUEST NO. 5**

All drafts and final iterations of statements or proposals, whether written or oral, by Board Members or Committee Members concerning the ISBR Application, including statements made by Board Members at the Board’s public hearing on December 8, 2015.

**DOCUMENT REQUEST NO. 6**

All drafts and final iterations of letters, reports, memoranda, or proposals authored by Board Professionals concerning the ISBR Application or the ISBR Proceeding, including the October 25, 2012 memorandum authored by David Banisch concerning occupancy and parking requirements, the January 3, 2013 memorandum authored by Jonathan Drill and David Banisch titled “ISBR Application – Off-Street Parking Requirement,” the July 20, 2014 memorandum authored by David Banisch concerning buffering and screening, the February 11, 2015 memorandum authored by Jonathan Drill titled “Interpretation and Application of Township Ordinance Section 21-46A.1.e (Means of Access for Fire Department Apparatus),” the September 28, 2015 letter by Thomas Quinn concerning stormwater management, and the November 3, 2015 “Jury Charge” provided to the Board by Jonathan Drill.

**DOCUMENT REQUEST NO. 7**

All drafts and final iterations of letters, reports, memoranda, or proposals concerning the ISBR Application or the ISBR Proceeding authored by the Liberty Corner Fire

Company, the Liberty Corner Fire Company Site Plan Review Committee, Peter Aprahamian, or anyone else acting or purporting to act on behalf of the Liberty Corner Fire Company.

**DOCUMENT REQUEST NO. 8**

All documents concerning ISBR's January 17, 2012 presentation, discussion, work session, or meeting with the Board.

**DOCUMENT REQUEST NO. 9**

All communications among Board Members and Committee Members, or between Board Members or Committee Members and members of the public, concerning ISBR's January 17, 2012 presentation, discussion, work session, or meeting with the Board.

**DOCUMENT REQUEST NO. 10**

All documents concerning Muslims, Islam, mosques, the Quran (also known as the "Koran"), Muslim worship or prayer services, wudu, imams, burkas, hijabs, Sharia (also known as "Shari'ah"), jihad, or anything else associated with or related to Muslims or Islam.

**DOCUMENT REQUEST NO. 11**

All documents concerning animal sacrifices, taqiyya, tawriya, or Pamela Geller.

**DOCUMENT REQUEST NO. 12**

All documents concerning terrorism or terrorist groups, including Al Qaeda (also known as "Al Qaida"), the Taliban, Boko Haram, Al-Shabaab, Hamas, Hezbollah, and the Islamic State of Iraq and Syria (also known as "ISIS," "ISIL," or "Daesh").

**DOCUMENT REQUEST NO. 13**

All documents concerning terrorist attacks, including the World Trade Center attacks on September 11, 2001, the Boston Marathon bombing on April 15, 2013, the Paris attacks on November 13, 2015, the San Bernardino shootings on December 2, 2015, and the Brussels attacks on March 22, 2016.

**DOCUMENT REQUEST NO. 14**

All documents concerning any memorials within the Township constructed or otherwise created to commemorate the terrorist attacks of September 11, 2001.

**DOCUMENT REQUEST NO. 15**

All documents concerning the Al Falah Center, plans or proposals to build a mosque in Bridgewater Township, or litigation concerning the Al Falah Center.

**DOCUMENT REQUEST NO. 16**

All documents concerning or communications with the Bernards Township Citizens for Responsible Development (also known as the “BTCRD”); its attorneys, including Robert Simon; its trustees, including Virginia Brady, Alice Smyk, Kenneth Bradley, and Vincent Ursino; or anyone else acting or purporting to act on behalf of the BTCRD.

**DOCUMENT REQUEST NO. 17**

All documents concerning or communications with anyone who served as an expert witness for any objector in the ISBR Proceeding, including Peter Steck, Alexander Litwornia, Paul D. Fox, and William Grundmann.

**DOCUMENT REQUEST NO. 18**

All documents concerning the “Preserve Liberty Corner” movement, any object inscribed with or containing the words “Preserve Liberty Corner,” or anti-mosque signs, flyers, banners, email messages, or pamphlets, distributed or otherwise existing at any time within the Township.

**DOCUMENT REQUEST NO. 19**

All documents concerning or communications with Lori Caratzola (also known as “Lori Gordon”), Cody Smith, Christopher Quick, Loretta Quick (also known as “Lori Quick”), Joseph Abbate, Michael Barth, or Linda Arnold.

**DOCUMENT REQUEST NO. 20**

Documents sufficient to show all communications with or concerning the following individuals, to the extent those communications include any content concerning ISBR, Dr. Chaudry, Muslims, Islam, religion, houses of worship, mosques, 124 Church Street, zoning ordinances, planning ordinances, the Board, or any other topic raised in the ISBR Proceeding: Carla Abbate, Ashok Wahi, Tarun Sethi, Kevin Tartaglione, Barbara Burger, Joe Kishel, Bill Walsh, Linda Watson, Douglas Watson, Michael Macchiarola, Parag Dhagat, Hong Pu (also known as “Pamela Pu”), David Smart, Yulia Goggi, or any other individual who testified or spoke during the ISBR Proceeding.

**DOCUMENT REQUEST NO. 21**

Documents sufficient to show all communications with or concerning the following individuals, to the extent those communications include any content concerning ISBR, Dr. Chaudry, Muslims, Islam, religion, houses of religious worship, mosques, 124 Church Street, zoning ordinances, planning ordinances, the Board, or any other topic raised in the ISBR Proceeding: the Hills Fun Group, Frank Zhao, Wei Zhou, John Zhang, Jane Zhang, Jennifer Cai, James Xie, Weimin Lu, or anyone else acting or purporting to act on behalf of the Hills Fun Group.

**DOCUMENT REQUEST NO. 22**

Documents sufficient to show all communications concerning the ISBR Application between any entity or individual and any of the following entities and individuals: the Bernards Township Fire Prevention Bureau, Janet Lake, anyone else acting or purporting to act on behalf of the Bernards Township Fire Prevention Bureau, the Liberty Corner Fire Company, the Liberty Corner Fire Company Site Plan Review Committee, Peter Aprahamian,

Mark Friedman, any current or former member of the Liberty Corner Fire Company, or anyone else acting or purporting to act on behalf of the Liberty Corner Fire Company.

**DOCUMENT REQUEST NO. 23**

All documents concerning communications or meetings relating to the ISBR Application between Peter Aprahamian or anyone else acting or purporting to act on behalf of the Liberty Corner Fire Company and any of the following entities or individuals: the Hills Fun Group, Frank Zhao, Wei Zhou, John Zhang, Jane Zhang, Jennifer Cai, James Xie, Weimin Lu, the BTCRD, Virginia Brady, Alice Smyk, Kenneth Bradley, Vincent Ursino, or anyone else acting or purporting to act on behalf of the Hills Fun Group or the BTCRD.

**DOCUMENT REQUEST NO. 24**

All documents concerning meetings, conversations, or other interactions of any kind during which ISBR, the ISBR Application, or the ISBR Proceeding was discussed.

**DOCUMENT REQUEST NO. 25**

All documents concerning the reactions of community members or the public at large to the Board's denial of the ISBR Application.

**DOCUMENT REQUEST NO. 26**

All documents concerning incidents of vandalism or other criminal activity at 124 Church Street.

**DOCUMENT REQUEST NO. 27**

The Township's Master Plans from 1986 to the present, and all drafts thereof.

**DOCUMENT REQUEST NO. 28**

Documents sufficient to show all applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan

approval, variances, exceptions, or any other form of relief in connection with a non-residential use in a residential zone, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 29**

Documents sufficient to show all applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in connection with a non-residential use in any designated historic district in the Township, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 30**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief by the applicants discussed in Paragraphs 244 through 300 of the Complaint, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 31**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant was required to comply with Township Ordinance § 21-46A.1(e)(5) or where the requirements of that provision were discussed, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 32**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant was required to submit a

fire service plan or where such a plan was discussed, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 33**

All documents concerning the Defendants’ review, use, study, or application of the proposed fire codes issued by the National Fire Protection Association (also known as the “NFPA”), including NFPA 1141 and NFPA 1.

**DOCUMENT REQUEST NO. 34**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant was required to comply with NFPA 1141 or where the requirements of that provision were discussed, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 35**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant was required to designate fire lanes on three sides of any included structure prior to obtaining the requested approval or relief, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 36**

All documents concerning the introduction, discussion, passage, purpose, or effect of any Township ordinance concerning fire vehicle access, including Township Ordinance § 21-46A.1; Ordinance # 1210, § 2; Ordinance # 1578; or any predecessor or successor bill or ordinance.

### **DOCUMENT REQUEST NO. 37**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant was required to submit a plan concerning internal circulation, pedestrian safety, or pedestrian drop-off, or where such a plan was discussed, where the application was initiated between 1986 and the present.

### **DOCUMENT REQUEST NO. 38**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief for a house of worship in which the Board or the Bernards Township Zoning Board of Adjustment applied a parking standard other than the ratio of “1 space for every 3 seats or 1 space for every 24 linear inches of pew space” pursuant to Township Ordinance § 21-22.1, where the application was initiated between 1986 and the present.

### **DOCUMENT REQUEST NO. 39**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in connection with a non-residential use in a residential zone in which the Board or the Bernards Township Zoning Board of Adjustment granted the applicant an exception or variance from the requirements of Township Ordinance § 21-22.1, where the application was initiated between 1986 and the present.

### **DOCUMENT REQUEST NO. 40**

All documents concerning the introduction, discussion, passage, purpose, or effect of any Township ordinance concerning parking, including Township Ordinance § 21-22.1;

Ordinance # 585, § 510A; Ordinance # 760, §§ 34-35; Ordinance # 1004, § 5; Ordinance # 1103, § 24; Ordinance # 1222, § 5; or any predecessor or successor bill or ordinance.

**DOCUMENT REQUEST NO. 41**

All documents concerning the Defendants' review, use, study, or application of any edition of the Institute of Transportation Engineers' publication titled *Parking Generation* or any information contained therein from 1985 to the present.

**DOCUMENT REQUEST NO. 42**

All memoranda, studies, or reports relating to parking demand, parking requirements, or parking needs from 1986 to the present.

**DOCUMENT REQUEST NO. 43**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief for a non-residential use in which the applicant was required to reduce its average lighting intensity to 0.5 footcandles or lower, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 44**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief for a non-residential use in which the applicant was required to reduce its average lighting intensity below the maximum levels set forth in Township Ordinance § 21-41.3, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 45**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief for a non-residential use in which the applicant was required to reduce its average lighting intensity in order to minimize undesirable off-premises effects pursuant to Township Ordinance § 21-41.2, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 46**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief for a non-residential use in which the applicant was granted the requested approval or relief prior to submitting a lighting plan, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 47**

All documents concerning the introduction, discussion, passage, purpose, or effect of any Township ordinance concerning site lighting, including Township Ordinance § 21-41.1; Township Ordinance § 21-41.2; Township Ordinance § 21-41.3; Ordinance # 585, § 612A; Ordinance # 585, § 612B; Ordinance # 585, § 612C; Ordinance # 858, § 612B; Ordinance # 858, § 612C; Ordinance # 641; Ordinance # 760, § 50; Ordinance # 1429; or any predecessor or successor bill or ordinance.

**DOCUMENT REQUEST NO. 48**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief for a non-residential use in which the applicant

was permitted to construct or maintain any structures or improvements in a buffer area bordering a residential use or where the applicant was permitted to maintain a buffer of less than the distance required by applicable ordinances, or where such plans were discussed, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 49**

All documents concerning the introduction, discussion, passage, purpose, or effect of any Township ordinance concerning buffers, including Township Ordinance § 21-28.2; Ordinance # 585, § 516B; Ordinance # 760, § 37; or any predecessor or successor bill or ordinance.

**DOCUMENT REQUEST NO. 50**

All memoranda, studies, or reports relating to buffers or the effects of drainage basins in buffers from 1986 to the present.

**DOCUMENT REQUEST NO. 51**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant submitted a landscaping plan with a cross-sectional view, or where such a plan was discussed, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 52**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant was permitted to satisfy screening requirements by installing fencing or by installing a combination of fencing and

plantings, or where such a plan was discussed, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 53**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief in which the applicant was directed to work with a landscaping committee after obtaining the requested approval or relief, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 54**

All documents concerning the introduction, discussion, passage, purpose, or effect of any Township ordinance concerning screening, including Township Ordinance § 21-28.1; Ordinance # 585, § 516A; or any predecessor or successor bill or ordinance.

**DOCUMENT REQUEST NO. 55**

All memoranda, studies, or reports relating to screening or the use of plantings or fencing for screening from 1986 to the present.

**DOCUMENT REQUEST NO. 56**

All documents concerning applications to the Board or the Bernards Township Zoning Board of Adjustment seeking preliminary site plan approval, final site plan approval, variances, exceptions, or any other form of relief for a non-residential use in which the applicant was granted the requested approval or relief prior to either submitting or finalizing a stormwater management system or plan, where the application was initiated between 1986 and the present.

**DOCUMENT REQUEST NO. 57**

All documents from 2000 to the present concerning allegations or proof of wrongdoing against any Board Member, Committee Member, or Board Professional, or any

discipline, censure, punishment, or adverse measure taken against any Board Member, Committee Member, or Board Professional, including criminal records.

**DOCUMENT REQUEST NO. 58**

All documents concerning allegations or proof that the Township Defendants, Board Members, Committee Members, or Board Professionals violated rights protected by the United States Constitution, the New Jersey Constitution, the Religious Land Use and Institutionalized Persons Act, the New Jersey Municipal Land Use Law, or Bernards Township land use ordinances from 1986 to the present.

**DOCUMENT REQUEST NO. 59**

All documents concerning allegations or proof of discrimination, prejudice, or bias on the basis of religion, color, national origin, or race against the Township Defendants, Board Members, Committee Members, or Board Professionals from 1986 to the present.

**DOCUMENT REQUEST NO. 60**

All handbooks, policies, practices, or procedures published, used, or adopted by the Township Defendants concerning discrimination on the basis of religion, color, national origin, or race.

**DOCUMENT REQUEST NO. 61**

All handbooks, policies, practices, or procedures published, used, or adopted by the Township Defendants concerning anti-discrimination requirements or religious freedom under the United States Constitution, the New Jersey Constitution, or the Religious Land Use and Institutionalized Persons Act.

**DOCUMENT REQUEST NO. 62**

All documents concerning the Board Members', Committee Members', and Board Professionals' training concerning discrimination on the basis of religion, color, national origin, or race.

**DOCUMENT REQUEST NO. 63**

Documents sufficient to show all Board Members, Committee Members, and Board Professionals who attended training sessions concerning discrimination on the basis of religion, color, national origin, or race.

**DOCUMENT REQUEST NO. 64**

All documents concerning Board Members', Committee Members', and Board Professionals' training concerning anti-discrimination requirements or religious freedom under the United States Constitution, the New Jersey Constitution, or the Religious Land Use and Institutionalized Persons Act.

**DOCUMENT REQUEST NO. 65**

Documents sufficient to show all Board Members, Committee Members, and Board Professionals who attended training sessions concerning anti-discrimination requirements or religious freedom under the United States Constitution, the New Jersey Constitution, or the Religious Land Use and Institutionalized Persons Act.

**DOCUMENT REQUEST NO. 66**

All documents concerning the Board Members', Committee Members', and Board Professionals' training concerning the requirements of the New Jersey Municipal Land Use Law or Township land use ordinances.

**DOCUMENT REQUEST NO. 67**

Documents sufficient to show all Board Members, Committee Members, and Board Professionals who attended training sessions concerning the requirements of the New Jersey Municipal Land Use Law or Township land use ordinances.

**DOCUMENT REQUEST NO. 68**

Documents sufficient to show all Board Members, Committee Members, and Board Professionals who failed to comply with or attend any required training sessions.

**DOCUMENT REQUEST NO. 69**

All documents from 2000 to the present concerning the Ku Klux Klan, neo-Nazis, cross burning, white supremacy, anti-Semitism, anti-Catholicism, or anti-Muslim sentiment, or any other hate-based or Islamophobic group or activity.

**DOCUMENT REQUEST NO. 70**

All documents from 2000 to the present concerning allegations or proof that any Township Defendant has been associated with or had ties to the Ku Klux Klan, neo-Nazis, cross burning, white supremacy, anti-Semitism, anti-Catholicism, or anti-Muslim sentiment, or any other hate-based or Islamophobic group or activity.

**DOCUMENT REQUEST NO. 71**

All documents from 1986 to the present concerning allegations or proof that any Board Member, Committee Member, or Board Professional has been associated with or had ties to the Ku Klux Klan, neo-Nazis, cross burning, white supremacy, anti-Semitism, anti-Catholicism, or anti-Muslim sentiment, or any other hate-based or Islamophobic group or activity.

**DOCUMENT REQUEST NO. 72**

Documents sufficient to show endorsements of, donations to, or associations with the political campaigns of Donald J. Trump or Ted Cruz by any Board Member, Committee Member, Board Professional, or Township Defendant.

**DOCUMENT REQUEST NO. 73**

All documents concerning the investigation by the U.S. Department of Justice regarding the Board's denial of the ISBR Application.

**DOCUMENT REQUEST NO. 74**

All documents or written answers produced to the U.S. Department of Justice pursuant to its investigation regarding the Board's denial of the ISBR Application.

**DOCUMENT REQUEST NO. 75**

Documents sufficient to show the education, training, and other professional qualifications of the Board Members, Committee Members, and Board Professionals.

**DOCUMENT REQUEST NO. 76**

Documents sufficient to show the funding or financing of any political campaigns of the Board Members or Committee Members, or of entities that campaigned on behalf of any Board Member or Committee Member.

**DOCUMENT REQUEST NO. 77**

Documents sufficient to show the parameters of the Liberty Corner Historic District.

**DOCUMENT REQUEST NO. 78**

All documents concerning both the Liberty Corner Historic District and ISBR's Application.

**DOCUMENT REQUEST NO. 79**

Documents sufficient to show the attendance of community members during the ISBR Proceeding, including attendance logs or sign-in sheets.

**DOCUMENT REQUEST NO. 80**

Documents sufficient to show all payments relating to the use or rental of the Bernards Township Community Center or Harry Dunham Park facilities by ISBR.

**DOCUMENT REQUEST NO. 81**

Documents sufficient to show the use or rental of the Bernards Township Community Center or Harry Dunham Park facilities by any entity or individual on terms more favorable than those imposed upon ISBR.

**DOCUMENT REQUEST NO. 82**

All re-examination reports completed by the Township Defendants pursuant to the New Jersey Municipal Land Use Law from 1986 to the present.

**DOCUMENT REQUEST NO. 83**

All memoranda, studies, or reports relating to non-residential uses in residential zones commissioned or created between January 1, 2000 and the present.

**DOCUMENT REQUEST NO. 84**

All documents concerning the introduction, discussion, passage, purpose, implementation, application, or effect of Ordinance # 2242 or any predecessor or successor bill or ordinance.

**DOCUMENT REQUEST NO. 85**

All drafts of Ordinance # 2242 or any predecessor or successor bill or ordinance.

**DOCUMENT REQUEST NO. 86**

All drafts of any document authored by David Banisch, any other Board Professional, or anyone else acting at the direction of or on behalf of the Board or the Committee concerning Ordinance # 2242, houses of worship, institutional uses, potential zoning amendments, conditional uses, or permitted uses.

**DOCUMENT REQUEST NO. 87**

All drafts and final iterations of statements or proposals, whether written or oral, by Committee Members or Board Members concerning Ordinance # 2242 or any predecessor or successor bill or ordinance.

**DOCUMENT REQUEST NO. 88**

All documents concerning public comments or questions relating to Ordinance # 2242 or possible amendments altering the Township's zoning or use requirements for houses of worship.

**DOCUMENT REQUEST NO. 89**

Documents sufficient to show all email addresses and social media accounts used by Board Members, Committee Members, Board Professionals, and Township Defendants.

Dated: April 8, 2016

/s/ Michael Buchanan

Adeel A. Mangi (admitted *pro hac vice*)  
Michael F. Buchanan  
Muhammad U. Faridi (admitted *pro hac vice*)  
Alejandro H. Cruz (admitted *pro hac vice*)  
Diana M. Conner (admitted *pro hac vice*)  
Paul D. Swanson (admitted *pro hac vice*)

PATTERSON BELKNAP

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New York, New York 10036

Tel.: (212) 336-2000

Fax: (212) 336-2222

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2016, I caused the foregoing to be served by email  
on the following counsel of record:

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