

**CLEARY GIACOBBE ALFIERI JACOBS LLC**

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CSC TKR, LLC,

Petitioner,

v.

BOROUGH OF MADISON,

Respondent.

STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

DOCKET NO.: CC23030139

**NOTICE OF MOTION FOR  
RECONSIDERATION AND A STAY  
OF THE BOARD'S ORDER DATED  
JUNE 29, 2023**

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**TO:** Anthony P. D'Elia, Esq.  
Norris McLaughlin, PA  
400 Crossing Blvd., 8<sup>th</sup> Floor  
Bridgewater, NJ 08807  
*Attorneys for Petitioner*

**COUNSEL:**

**PLEASE TAKE NOTICE** that the undersigned attorneys for Respondent, Borough of Madison (hereinafter referred to as "Respondent"), shall move before the State of New Jersey Board of Public Utilities, for an Order reconsidering and staying the Board's Order dated June 29, 2023 pursuant to N.J.A.C. 14:17-9.6. Respondent

**PLEASE TAKE FURTHER NOTICE** that in support of the within application the undersigned shall rely upon the annexed Memorandum of Law.

**PLEASE TAKE FURTHER NOTICE** that the within Notice of Motion along with all supporting papers is this day being electronically filed with the State of New Jersey, Board of Public Utilities, with copies to the attorneys for Petitioner at the address listed above. Oral Argument is requested,

**CLEARY GIACOBBE ALFIERI JACOBS, LLC**  
Attorneys for Respondent, Borough of Madison

By: s/ Ronald F. Kavanagh  
Ronald F. Kavanagh, Esq.

Dated: July 5, 2023