

DASTI, McGUICKIN, McNICHOLS, CONNORS, ANTHONY & BUCKLEY

JERRY J DASTI, ESQUIRE

620 West Lacey Road

Forked River, New Jersey 08731

(609) 971-1010 FAX (609) 971-7093

TOWNSHIP OF PEMBERTON, COUNTY
OF BURLINGTON, A BODY OF POLITIC

Plaintiff

vs.

ELLY LAUNDRY

Defendant

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: SPECIAL CIVIL PART
BURLINGTON COUNTY
LANDLORD/TENANT

DOCKET NO. LT-

VERIFIED COMPLAINT

Plaintiff, Township of Pemberton, County of Burlington (hereinafter referred to as the "Township") with a business office at 500 Pemberton-Browns Mills Road, Pemberton, New Jersey 08068, by way of Complaint against the Defendant Elly Laundry states as follows:

1. Plaintiff is the owner of a shopping center located at 100 Pemberton-Browns Mills Road, Pemberton, New Jersey 08015, (hereinafter referred to as the "property"). An oral business/commercial lease agreement has existed by and between the Plaintiff and the Defendant.
2. Pursuant to the aforementioned agreement, it is a oral month to month lease agreement.
3. Plaintiff has provided to Defendant in accordance with the terms of the agreement instructions to vacate the property.
4. The instructions to vacate the property were originally provided by letter dated February 18, 2025 to vacate by April 1, 2025.

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McNICHOLS, CONNORS,
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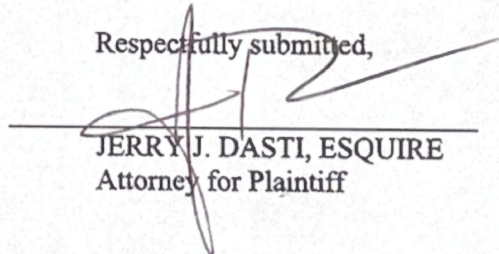
5. The date to vacate the property was extended by the Township to June 1, 2025.
6. Defendant has refused to vacate the property.
7. As a result of the Defendant's refusal to vacate the property, the contract of sale which has been entered into by Plaintiff and a third-party is in jeopardy because Plaintiff cannot convey a clear Title, tenant free, to the prospective purchaser.
8. Plaintiff has complied with all notification requirements as mandated by law and by the Township of Pemberton.
9. Defendant did not acquire ownership of the property from the Plaintiff.
10. Plaintiff did not obtain Title to the property from the Defendant.

WHEREFORE, Plaintiff demands judgment for possession of the property against the Defendant, together with outstanding attorney's fees and cost of suit.

DATED:

July 19, 2025

Respectfully submitted,


JERRY J. DASTI, ESQUIRE
Attorney for Plaintiff

DASTI, McGUICKIN,
McNICHOLS, CONNORS,
ANTHONY & BUCKLEY

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AFFADAVIT OF VERIFICATION

State of New Jersey)

) ss.:

County of Burlington)

I, Jack Tompkins, being of legal age upon this oath depose and say:

1. I am the duly elected Mayor of the Township of Pemberton. The Township is the owner of the property located at 100 Pemberton-Browns Mills Road, Pemberton, New Jersey 08015. I have facts concerning this matter.
2. I have reviewed the Verified Complaint to which this Affidavit is annexed. The facts set forth in the Verified Complaint are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: June 19, 2025


Jack Tompkins, Mayor of Pemberton Township

Sworn to and subscribed
before me this 19th day of
June, 2025

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MICHELE M BROWN
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES FEB. 28, 2027

LANDLORD VERIFICATION

1. The matter in controversy is not the subject of any other court action or arbitration proceeding now, pending or contemplated and no other parties should be joined in this action.
2. I certify that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).
3. The foregoing statements made by me are true and I am aware that if any of the foregoing statements made by me are willfully false I am subject to punishment.

Date: June 19, 2025



Jack Tompkins, Mayor of Pemberton Township

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