

LOFARO & REISER, L.L.P.
55 Hudson Street
Hackensack, New Jersey 07601
Attorneys for Plaintiff

<p>SHAPIRO, CROLAND, REISER, APFEL, & DI IORIO, LLP f/k/a SHAPIRO & CROLAND,</p> <p>Plaintiff,</p> <p>v.</p> <p>HERBERT J. LIEBER, HENRIETTA FRIEDMAN, CHAIM STERN, MEYER HALPERN, IMF REALTY TRUST, ELLIOT S. GORDON, and MAURICE GLETZER,</p> <p>Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY BERGEN COUNTY: LAW DIVISION DOCKET NO. BER-L-2653-11 JUDGMENT NO.: J-133919-12</p> <p>Civil Action</p> <p>CERTIFICATION OF GLENN REISER</p>
--	--

GLENN REISER, of full age, hereby certifies as follows:

1. I am a member of the law firm of Lofaro & Reiser, LLP, counsel for the plaintiff Shapiro, Croland, Reiser, Apfel & Di Iorio, LLP f/k/a Shapiro & Croland (“Plaintiff”) in the above matter. I am responsible for my firm’s handling of this matter and, as such, am fully familiar with the facts set forth herein.

2. I submit this Certification in support of Plaintiff’s motion for entry of an Order compelling the turnover of funds on deposit with the Superior Court of New Jersey Trust Fund Unit.

3. On June 15 2012 the Court entered Final Judgment in favor of Plaintiff and against the Defendants, jointly and severally, in the principal amount of \$54,829.85 plus taxed costs (the “Judgment”). See Exhibit A annexed hereto.

4. On June 21, 2012, I submitted Plaintiff’s Bill of Costs to the Bergen County Clerk consisting of \$559.85 split between court filing fees and service of process fees. See Exhibit B annexed hereto.

5. Shortly after obtaining the Judgment, my client informed me that on June 22, 2012 Defendants were awarded \$213,600 in connection with a separate condemnation matter captioned as *The Middlesex County Improvement Authority*, Superior Court of New Jersey, Law Division, Middlesex County, Docket No.: MID-L-10039-07 (the “Condemnation Case”). This award is confirmed by the June 22, 2012 allocation hearing opinion and Order issued by the Honorable Philip Lewis Paley, J.S.C. See Exhibit C annexed hereto.

6. Plaintiff docketed its Judgment with the Judgment Section of the Superior Court of New Jersey on June 27, 2012.

7. I then confirmed that the Superior Court of New Jersey Trust Fund Unit is holding in excess of \$3 million dollars deposited by the plaintiff in the Condemnation Case. Specifically, I spoke with several staff members of the Trust Fund Unit who confirmed that said funds were being held for the Condemnation Case.

8. On July 2, 2012, the Honorable Peter E. Doayne, A.J.S.C. entered a Writ of Execution directing the Mercer County Sheriff to levy on the following assets of the Defendants:

Any and all monies, claims, rights, credits, awards, interest, and the proceeds thereof claimed by the defendants, due to or to become due or awarded to defendants in connection with a condemnation action captioned, The Middlesex County Improvement Authority v. Adventure Realty, LLC, et al, Superior Court of New Jersey, Law Division, Middlesex County, Docket No.: MID-L-10039-07, including all such funds deposited with the Superior Court of New Jersey Trust Fund Unit, 25 W. Market Street, 6th Floor, North Wing, Trenton, New Jersey that arises under, or in connection with, the aforementioned condemnation action.

See Exhibit D annexed hereto.

9. On the same day, July 2, 2012, I caused the Writ to be sent to the Mercer County Sheriff by Federal Express overnight mail with specific instructions to levy on the Defendants' interest in the \$213,600 allocation award they received in the Condemnation Case. See Exhibit E annexed hereto.

10. On July 10, 2012, the Mercer County Sheriff successfully served the Writ of Execution on the Superior Court of New Jersey Trust Fund Unit and levied on the Defendants' "rights, title and interest in and to all monies due or to grow due to . . . from NJ Trust Fund Unit." A copy of the Mercer County Sheriff's written confirmation of the judgment execution and levy is annexed hereto as **Exhibit F**.

11. On July 25, 2012, the Mercer County Sheriff served the Defendants with written notice of the levy. See Exhibit G annexed hereto.

12. A computation of post-judgment interest running from the date the Judgment was entered through the return date of this Motion is annexed hereto as **Exhibit H**.

13. Notice of Plaintiff's application for turnover has been provided to the Superior Court of New Jersey Trust Fund Unit c/o Janet C. Richenbach, Esq.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Glenn Reiser

Dated: July ____, 2012