

CA - Dunellen

5/23/75

request for admission made by  
Plaintiffs of Dunellen and answers

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Dunellen

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BAUMGART & BEN-ASHER  
134 Evergreen Place  
East Orange, New Jersey 07018  
201-677-1400

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National Committee Against  
Discrimination in Housing, Inc.  
1425 H Street, N.W.  
Washington, D.C. 20005  
202-783-8150  
Attorneys for Plaintiffs

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION: MIDDLESEX COUNTY  
DOCKET NO. C - 4122-73

URBAN LEAGUE OF GREATER NEW  
BRUNSWICK, et al.

Plaintiffs

vs.

THE MAYOR AND COUNCIL OF THE  
BOROUGH OF CARTERET, et al.,

Defendants.

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:  
:

Civil Action

REQUEST FOR ADMISSION

TO:

Henry Handelman, Esq.  
381 North Avenue  
Dunellen, New Jersey 08812

Plaintiffs hereby make Request for Admissions  
pursuant to R. 4:22, et seq:

1. Does defendant admit that the municipal zoning ordinance does not provide for mobile homes or trailers?

~~Yes.~~ Ordinance silent on issue.

2. Does defendant admit that it does not have a public housing authority?

**Yes.**

3. Does defendant admit that its minority population in 1970 was 13 black, zero Spanish-speaking and 26 other minority?

**Irrelevant to issues here.**

4. Does defendant admit that its black population remained at 13 during the period 1960-1970?

**Irrelevant to issues here.**

5. Does defendant admit that its population increased from 6,840 to 7,072 during the period 1960-1970?

**Yes.**

6. Does defendant admit that it has land which can be developed or used for residential purposes?

**There are no tracts available. There are isolated single lots, upon which can be erected single or two family homes depending on character of neighborhood.**

7. Does defendant admit that there are no peculiar circumstances which require maintenance of the zoning and other land use regulations listed in 1 above? If this is denied, list such peculiar circumstances and provide a summary of the facts supporting such circumstances.

Defendant denies number 7 for the following reasons:

- A) There is a separate ordinance that was enacted in 1941 to cover specifically trailers because at that time there was a particular problem due to the proximity of Camp Kilmer.
- B) As interpreted by the local building inspector from his interpretation of the building code, trailers are not permitted. This might be subject to change if there is federal or state code on either trailers or that type of prefab houses.



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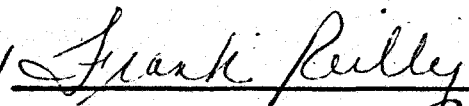
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**CERTIFICATION**

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

DATED:

5/23/75

15/   
Municipal Clerk