

CA - Edison

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Answers to Request for Admission

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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:

Roland Winter, Esq.  
940 Amboy Avenue  
Edison, New Jersey 08817

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

1. Does defendant admit that as of November 1974 its municipal zoning ordinance does not provide for the following as conforming uses:

- a. mobile homes? Not withstanding, there are no expressed provisions for these uses in the ordinance.
- b. trailers? There are several trailer parks in existence and in use as nonconforming uses.
- c. trailer parks?

2. Does defendant admit that as of November 1974:

- a. 200 acres of vacant land were zoned for low-rise apartments? Yes.
- b. 10 acres of vacant land were zoned for high-rise apartments? Yes.
- c. 1,881 acres of vacant land were zoned for single-family residential use? Yes.

3. Does defendant admit that as of November 1974, 894 vacant acres were subject to lot area requirements of 20,000-40,000 sq. ft.? No.

4. Does defendant admit that as of November 1974, 894 vacant acres were subject to minimum floor area requirements of 1,400 sq. ft.? yes.

5. Does defendant admit that as of November 1974, 691 vacant acres were subject to minimum floor area requirements of 1,200 sq. ft.? Yes.

6. Does defendant admit that as of November 1974, 3,469 acres of vacant land were zoned for industry? Yes.

7. Does defendant admit that as of November 1974, there were less than 6,000 acres of vacant land in the municipality? Yes,

8. Does defendant admit that the Middlesex County Master Plan states that total acreage needed by Edison to accommodate existing and projected industrial uses by the year 2000 is 1,096? No.

9. Does defendant admit that its public housing authority has not built units for non-elderly families since 1963? Yes.

10. Does defendant admit that it has three public housing projects? Yes.

11. Does defendant admit that of its three projects:

a. one project of 60 units is occupied by all blacks? Yes.

b. one project of 30 units is occupied by all blacks? Yes.

c. one project of 70 units is occupied by 65 white and five black families? Yes.

12. Does defendant admit that the number of building permits it issued between 1965 and 1973 was as follows:

	<u>1965</u>	<u>1966</u>	<u>1967</u>	<u>1968</u>	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>1972</u>	<u>1973</u>
Single Family	2,000	<del>694</del>	<del>282</del>	<del>297</del>	<del>239</del>	<del>176</del>	<del>249</del>	<del>114</del>	143
Multi-family	1,391	350	4	56	0	10	92	8	-

No

13. Does defendant admit that in 1970, its minority population was 1,367 black; 494 Spanish-speaking? and 286 other minority? No#

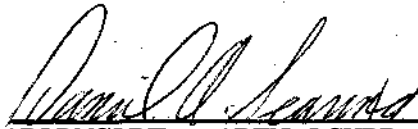
14. Does defendant admit that its black population decreased from 1,430 to 1,367 during the period 1960-1970? No.

15. Does defendant admit that its total population increased from 20,502 to 23,137 during the period 1960-1970? **No.**

16. Does defendant admit that blacks are concentrated in the R-B and R-BB zones in the Inman Avenue area? No.

17. Does defendant admit that a substantial portion of its developable land is readily amenable to sewer and water utility installation? Yes.

18. Does defendant admit that there are no peculiar circumstances which require maintenance of the zoning and other land use regulations listed in 1 through 6 above? If this is denied, please list such peculiar circumstances and provide a summary of the facts supporting such circumstances. No.



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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: \_\_\_\_\_

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