

CA - Helmetta 21 - Nov - 74

Supporting Affidavit for the Borough
of Helmetta

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MIDDLESEX COUNTY, N.J.

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Martin B. ...
Clerk

RICHARD F. PLECHNER

351 MAIN STREET
METUCHEN, N. J. 08840
(201) 548-4457

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MIDDLESEX COUNTY

ATTORNEY FOR Defendant

Borough of Helmetta

Plaintiff

URBAN LEAGUE OF GREATER NEW BRUNSWICK,
a non-profit corporation of the State
of New Jersey, et als

vs.

Defendant

MAYOR AND COUNCIL OF THE BOROUGH OF
HELMETTA, et als

314

Docket Afo.C-4122-73 ✓

CIVIL ACTION
Supporting Affidavit

STATE OF NEW JERSEY:

COUNTY OF MIDDLESEX: ^{SS}

RICHARD F. PLECHNER, of full age, being dully sworn
upon his oath deposes and says:

1). I am the attorney for the defendant, Borough of
Helmetta; and I am the one actually entrusted with the defense of
this case.

2). Based on personal observations, I know that the
facts upon which this action is being brought against the Borough
of Helmetta are completely different from the facts upon which

this action is being brought against the other 22 municipalities in Middlesex County.

3). The Borough of Helmetta is a tiny municipality with an area of 512 acres and a population of approximately 1,000. Most of the population lives on that portion of the Borough of Helmetta which is dry useable land. Most of the land which is presently vacant in the Borough of Helmetta is vacant because it is primarily swamp and wet lands. Only about 100 acres of the vacant land within the Borough of Helmetta can be used for the development of residential housing without an extensive drainage project.

4). The Borough of Helmetta has only one industry within its boundaries which is the Helme Whitehall Company which is the principal employer in the Town. Other than this one employer, there are almost no opportunities for employment within the Borough of Helmetta. Also, the Borough of Helmetta is considerably far removed from any large sources of industrial employment and it has virtually no mass transportation. No low income person who moved into Helmetta would have a real opportunity to obtain employment, accept with the Helme Whitehall Company.

5). At this time, there is very little commercial development within the Borough of Helmetta. The only commercial development or establishments are Richard's General Store and one gas station. At this time, Helmetta could not possibly support any further commercial development which would open up employment possibilities. Due to its location surrounded by the southern end of East Brunswick, Spotswood, Monroe Township, and Jamesburg there are very few employment opportunities in the

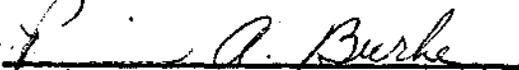
area near to Helmetta.

6). Although, it is conceivable that a low income person could move from New Brunswick or Perth Amboy to another suburban town within Middlesex County and find employment within that Town or nearby, it would be impossible for a low income family or a number of low income families to move to the Borough of Helmetta and expect to find any prospects for employment, transportation, recreation, or any of the other social services that they may require. For this reason, I believe that the case against the Borough of Helmetta differs from that against the others and should be severed from that of the other municipalities, defendants.



RICHARD t\ PLEGHNER

SWORN TO and SUBSCRIBED
before me this 21st day
of November, 1974.



PATRICIA A. BURKE
A Notary Public of New Jersey
My Commission Expires Jan. 17, 1978