

CA - Highland Park

7/1/75

request for admission of Plaintiffs
of New Brunswick and answers.

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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:

Lawrence Lerner, Esq.
Post Office Box 827
New Brunswick, New Jersey 08903

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

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

Admit.

2. Does defendant admit that its municipal zoning ordinance provides for a minimum of 80 percent one-bedroom dwelling units per building or development?

Admit.

3. Does defendant admit that its municipal zoning ordinance limits three-bedroom dwelling units to a maximum of five percent of the units in the building or development?

Admit.

4. Does defendant admit that its public housing authority has not built units for non-elderly families since 1961?

Admit

5. Does defendant admit that its 1970 minority population was 842 black, 15 Spanish-speaking and 81 other minority?

Admit.

6. Does defendant admit that its black population increased from 194 to 892 during 1960 to 1970?

Can neither admit or deny.

7. Does defendant admit that over 90 percent of the black population increase occurred in census tract 12?

Can neither admit or deny.

8. Does defendant admit that 18.7 percent of the black occupied dwelling units in census tract 12 are overcrowded as compared to 4.1 percent overcrowded for the entire municipality?

Can neither admit or deny.

9. Does defendant admit that its population increased from 11,049 to 14,385 during the period 1960 to 1970?

Admit.

10. Does defendant admit that there is land in the municipality which can be used for residential purposes?

Admit.

11. Does defendant admit that there are no peculiar circumstances which require maintenance of the provisions of the zoning ordinance and land use practices listed in one to three above? If this is denied, list such peculiar circumstances and provide a summary of the facts supporting such circumstances.

Improper question.

Paul Beck Mayor

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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:

June 28 1975

Paul Beck Mayor