

CA - ~~Quintana~~ Highland Park

11/10/75

Supplemental interrogatories demanded
by the Plaintiff of Highland Park

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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,

v.

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

Defendants

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:
:
:
:
:
:

Civil Action

SUPPLEMENTAL INTERROGATORIES

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

DEMAND is hereby made of the defendant BOROUGH OF
HIGHLAND PARK for Certified Answers to the following supplemental
interrogatories within the time prescribed by the Rules of
this Court.

1. Please list each of the zoning ordinance provisions
and land use practices admitted in the Request for Admissions
answered by you on June 28, 1975 which you contend are justified
by peculiar circumstances.

**All provisions are justified by conditions existing in the Borough
of Highland Park.**

2. Please state for each such ordinance provision or practice listed in response to Interrogatory #1 above, a summary of the peculiar circumstances, including the

~~facts which support it.~~
The ordinance has evolved out of a long history. The ordinance has been refined to its present existing state. The Borough engaged the services of a professional planner. E. Eugene Oross Associates of New Brunswick, N.J. to put together a master plan, which plan was adopted after much consideration by various boards and agencies.

3. Please state every other defense that you intend to raise at trial in response to the allegations of the complaint.
~~See Answer filed to complaint.~~

4. For each such defense listed in response to Interrogatory #3 above, provide a summary of the facts supporting it.
Question is too broad in scope.

5. If you plan to rely on any decision or action taken by any government official, agent, representative or employee of the defendant, County of Middlesex, or State of New Jersey regarding the defenses listed above, set forth with particularity:

Question is too broad in scope.

(a) each and every such official decision or action upon which defendant will rely:

(b) the name and position of each government official, agent, representative or employee

(c) a description of any document or writing supporting such decision or action.

6. Please give the name and address of each expert witness whose testimony will be relied upon in preparation of the defence listed in Interrogatories 1-5 above. **Expert witnesses have not as of yet been determined. Defendant reserves the right to add additional experts once it is ascertained what the contentions of the plaintiff are and has received a list of its experts and has had the opportunity to depose them.**

7. Please provide a summary of any written reports prepared for use at trial of any expert upon whose testimony defendant will rely at the time of trial, including a statement of where a copy of such a report can be obtained and its cost. **See answer to No. 6 above.**

8. If no written reports have been received, give the time, date and place of any interviews or oral discussions with experts and set forth a summary of such discussions. **None.**

BAUMGART & BEN-ASHER
Attorneys for Plaintiff

BY:

David H. Ben-Asher
DAVID H. BEN-ASHER
A member of the Firm

7-29-75

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 wilfully false, I am subject to punishment.

BY

Paul Beck, Mayor

DATED:

11/10/75