

CA - ~~Monroe~~ Monroe

3/24/75

+ Cover letter

+ Order to grant holding

+ Third party Complaint

3rd party D.
~~Acto parties~~

p.i. 915

pg 6

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MAR 26 1975

MOSS AND INGLESE

COUNSELLORS AT LAW
METUCHEN PROFESSIONAL BUILDING

406 MAIN STREET
METUCHEN, N.J. 08840
548-3122
AREA CODE 201

BRANCH OFFICE
134 N. MAIN STREET
MILLTOWN, N.J. 08850

ROBERT F. MOSS
NEW JERSEY BAR
FLORIDA BAR

SAMUEL C. INGLESE
NEW JERSEY BAR

DAVID JOSEPH FRIZELL
NEW JERSEY BAR

March 24, 1975

Honorable David D. Furman
Middlesex County Court House
New Brunswick, New Jersey 08903

Re: Urban League et als vs Mayor and
Council of Borough of Carteret, et als
Docket No. C-4122-73

Dear Judge Furman:

Enclosed find Order which provides that New Brunswick
and Perth Amboy shall be added as Third Party Defendants in the above
captioned case. If the same meets with Your Honor's approval and no
objection is entered within five (5) days pursuant to the Rule, kindly
affix your signature to the same and return to this office for filing.

Very truly yours,



SAMUEL C. INGLESE

SCI:baw
Enclosure

cc: All Attorneys

- 1) complaint - (hasn't seen yet)
- 2) cross-claim (answer + file cross-claim)
- 3) opinion re memo from Furman: settlement conf request w/all presence
then assign date w/ our memo outlining our position

MOSS AND INGLESE
406 MAIN STREET
METUCHEN, N. J. 08840
(201) 548-3122

ATTORNEYS FOR Defendant, Township Committee of
the Township of Monroe

*Plaintiff*s-URBAN LEAGUE OF GREATER NEW
BRUNSWICK, a none-profit corporation of the
State of New Jersey; CLEVELAND BENSON;
FANNIE BOTTS; JUDITH CHAMPION; LYDIA
CRUZ; BARBARA TIPPETT; KENNETH
TUSKEY and JEAN WHITE, ~~vs.~~ On their own
behalf and on behalf of all others similarly
Defendant situated,

vs.

Defendants - THE MAYOR AND COUNCIL OF
THE BOROUGH OF CARTERET, et als

SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION
MIDDLESEX COUNTY

Docket No. C-4122-73

CIVIL ACTION

ORDER

IT IS HEREWITH on this day of , 1975,

ORDERED that the City of Perth Amboy and the City of New Brunswick shall
be added as Third Party Defendants and that a Complaint be served upon them
within twenty (20) days from the date of this Order.

DAVID D. FURMAN, J. S. C.

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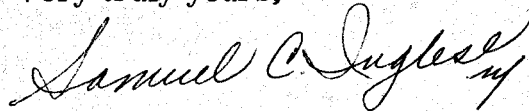
To all Attorneys:

Re: Urban League

Gentlemen:

Enclosed find proposed Complaint in the above
entitled matter. Kindly advise if you have any objection to same.

Very truly yours,



SAMUEL C. INGLESE

SCI:baw
Enclosure

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MAR 26 1975

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METUCHEN, N. J. 08840

(201) 548-3122

ATTORNEYS FOR Defendant, Township Committee of the
Township of Monroe

Plaintiffs-URBAN LEAGUE OF GREATER NEW
BRUNSWICK, a non-profit corporation of the
State of New Jersey; CLEVELAND BENSON;
FANNIE BOTTS; JUDITH CHAMPION; LYDIA
CRUZ; BARBARA TIPPETT; KENNETH
TUSKEY and JEAN WHITE. On their own
behalf and on behalf of all others similarly
~~Defendants~~
situated,

vs.

Defendants-THE MAYOR AND COUNCIL OF
THE BOROUGH OF CARTERET, et als

vs.

THE CITY OF PERTH AMBOY and THE CITY
OF NEW BRUNSWICK

SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION
MIDDLESEX COUNTY

Docket No. C-4122-73

CIVIL ACTION

THIRD PARTY COMPLAINT

All the above entitled Defendant Cities, Boroughs, and
Townships by way of Complaint herein say:

1. On or about July 23, 1974, Summons and Complaint, a
copy of which is attached hereto, was filed by the Urban League of Greater
New Brunswick, et als, against the named cities, boroughs, towns and
townships listed as Defendants therein.

2. Said Complaint generally alleges and demands that the Defendants amend Zoning Ordinances, Planning Ordinances and other land and use policies in practices so as to provide on a reasonable basis for a joint plan to facilitate racially and economically integrated housing within the means of Plaintiff and the class they represent.

3. The Defendants, City of Perth Amboy and City of New Brunswick are cities located within the region as comprised in the Complaint of the Urban League and are necessary parties to the suit, if a regional plan may be required by the Courts as a result of the Complaint of said Urban League.

4. A regional plan may have a detrimental effect upon cities of New Brunswick and Perth Amboy by drawing therefrom all the people represented by the class action and causing said cities to become empty ghost towns. In the alternative, a regional plan may call for maximum use of high population areas which has the facilities for mass transportation, retail businesses and recreational resources within walking distance. It would be highly beneficial to the class represented by the Urban League since the high cost of private transportation and other costs normally required in the suburbs would be eliminated.

WHEREFORE, the third party Plaintiffs demand judgment against the City of Perth Amboy and the City of New Brunswick in accordance with such Order or Judgments as may be Ordered by the Court in the case of Urban League of Greater New Brunswick, et als, vs. Mayor and Counsel of the Borough of Carteret, et als.

MOSS AND INGLESE
Attorneys for Def endant,
Township of Monroe

by _____
SAMUEL C. INGLESE