

CA - Monroe

23 - Oct - 75

Supplemental Interrogatories demanded
to ~~Monroe~~ Monroe @ cover letter -
~~pgs~~ w/answers
yellow p.i. # 9/12

pgs = 8

yellow p.i. # 9/12

CAC01647G

MOSS AND INGLESE

COUNSELLORS AT LAW

METUCHEN PROFESSIONAL BUILDING

406 MAIN STREET

METUCHEN, N.J. 08840

548-3122

AREA CODE 201

ROBERT F. MOSS

NEW JERSEY BAR

FLORIDA BAR

SAMUEL C. INGLESE

NEW JERSEY BAR

DAVID JOSEPH FRIZELL

NEW JERSEY BAR

BRANCH OFFICE

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

October 23, 1975

OCT 23 1975

Baumgart & Ben-Asher, Esqs.
134 Evergreen Place
East Orange, New Jersey 07018


Re: Urban League of Greater New Brunswick, et als
vs. Borough of Carteret, et als

Dear Sirs:

Enclosed herewith please find Answers to Supplemental Interrogatories of the Township of Monroe.

Since no one person in the Township can certify all the Answers, kindly accept same as if fully signed and executed on behalf of the Township.

Very truly yours,


SAMUEL C. INGLESE

SCI:cp
enc.

cc: All Attorneys for co-defendants

CA001647G

BAUMGART & BEN-ASHER
134 Evergreen Place
East Orange, New Jersey 07018
201-677-1400

01 25 1975

MARTIN E. SLOANE
DANIEL A. SEARING
ARTHUR WOLF
National Committee Against
Discrimination in Housing, Inc.
1425 H Street, N.W.
Washington, D.C. 20005
202-783-8150

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

:
:
:
:
:
:
:

Civil Action

SUPPLEMENTAL INTERROGATORIES

TO: Samuel C. Inglese, Esq.
406 Main Street
Metuchen, New Jersey 08840

DEMAND is hereby made of the defendant TOWNSHIP OF
MONROE 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 May 22, 1975, which you
contend are justified by peculiar circumstances.

§130-5 and §130-11

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.

Monroe Township is primarily a rural agricultural community. Monroe Township is in a rural fringe area of the New York Metropolitan area and it is capable of fulfilling a need of older citizens of the State of New Jersey and the region seeking to live in an inexpensive retirement community located in an area of surrounding country sites, yet being close enough to the metropolitan area in order that they can seek the pleasures and benefits of such areas.

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

N/A

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

See #3

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: N/A

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

N/A

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

N/A

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

N/A

6. Please give the name and address of each expert witness whose testimony will be relied upon in preparation of the defenses listed in Interrogatories 1-3 above.

Expert witnesses have not as of yet been determined other than those listed in ~~xxxx~~ answers to interrogatories. 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.

None

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

9. Please provide the total number of mobile homes in Monroe that exist as non-conforming uses.

Total of 33 Mobile Homes

10. Please state the effective date and source of the acreage statistics provided in response to interrogatory 9, plaintiffs' first set of interrogatories.

The effective date was ~~January~~ January 1, 1975 and the source was the Tax Assessors records.

11. Please describe all litigation filed, pending, adjudicated or otherwise resolved from January 1, 1973 to the present in which one or more of the issues involves all or any part of the municipal zoning ordinance. For each such case, please list the full caption, civil action number, court, date filed, name of plaintiffs' attorney and a summary of result or current status (this case need not be listed).

A. Edward Cassalty, George Fuller and Frederick Smithline, individually and as Trustees in Liquidation of Cambridge Development Corp., and Cambridge Development Corp., Plaintiffs-Appellants,

vs.

Township of Monroe, Board of Adjustment of Township of Monroe, Frank Golino, Building Inspector of Township of Monroe, Municipal Council of the Township of Monroe and Mayor Joseph Indyk, Defendants-Respondents.

SUPERIOR COURT OF NEW JERSEY
APPELLATE DIVISION
A-1873-72

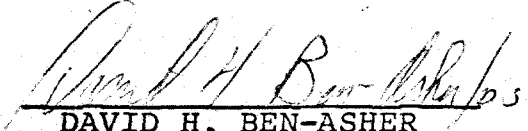
B. Township of Monroe vs. Guardian Development Corp., James E. and Becky M. Cooper

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MIDDLESEX COUNTY
C-185-74

Attorneys - Guardian Development - Arthur L. Phillips
Coopers - Stein & Rosen

BAUMGART & BEN-ASHER
Attorneys for Plaintiff

BY:


DAVID H. BEN-ASHER
A member of the Firm

7-30-75

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 _____

DATED: _____