

~~0044~~ Old Bridge (Madison)
CA-

9-17-1974

Twp of Madison (Old Bridge)'s Answer to Complaint

3 pgs.

CA001746A

MADISON

LOUIS J. ALFONSO
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Old Bridge, New Jersey 08857
Attorney for Defendants
Township of Madison

NEW JERSEY SUPERIOR COURT
CHANCERY DIVISION
MIDDLESEX COUNTY
Docket No. C 4122-73

URBAN LEAGUE OF GREATER NEW :
BRUNSWICK, etc., et als, :

Plaintiffs, :

vs. :

THE MAYOR AND COUNCIL OF THE :
BOROUGH OF CARTERET, et als. :

Defendants. :

Defendant, Township of Madison by way of answer to
the complain filed herein say:

1. Defendants deny the allegations of paragraphs 1, 2 and 3.
2. Defendants have insufficient knowledge to either admit or deny the allegations of paragraphs 4, 5, 6, 7, 8, 9, 10 and 11.

3. Defendants deny the allegations of Paragraph 12.
4. Defendants admit the allegations of Paragraph 13, 14 and 15.
5. Defendants have insufficient knowledge to either admit or deny the allegations of Paragraphs 16, 17, 18 and 19.
6. Defendants deny the allegations of paragraph 20.
7. Defendants have insufficient knowledge to either admit or deny the allegations of Paragraphs 21 and 22.
8. Defendants deny the allegations of paragraphs 23, 24, 25 and 26.
9. Defendants have insufficient knowledge to either admit or deny the allegations of Paragraph 27.
10. Defendants deny the allegations of Paragraphs 28, 29 and 30.
11. Defendants have insufficient knowledge to either admit or deny the allegations of paragraph 31.
12. Defendants deny the allegations of Paragraphs 32, 33, 34 and 35.
13. Defendants deny the allegations of Paragraph 1 of the Appendix to Complaints,

FIRST SEPARATE DEFENSE

Plaintiffs do not have standing to bring suit against the Township of Madison.

SECOND SEPARATE DEFENSE

Plaintiffs have failed to state a claim upon which relief can be granted.

THIRD SEPARATE DEFENSE

The Complaint is defective as it has failed to join indispensable parties to this litigation.

FOURTH SEPARATE DEFENSE

The plaintiffs do not constitute a class.

FIFTH SEPARATE DEFENSE

The Complaint should be dismissed as it fails to set forth a claim upon which relief can be granted.

SIXTH SEPARATE DEFENSE

It would be improper, and unreasonable to impose a burden of financing housing upon Madison Township.

SEVENTH SEPARATE DEFENSE

The Complaint as to this defendant should be dismissed as proper jurisdiction has not been obtained over the Township of Madison as Madison Township is not governed by nor does it have a Township Committee.

LOUIS J. ALFONSO

I hereby certify that a copy of the within Answer was served within the time prescribed in the Rule.

LOUIS J. ALFONSO

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