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Answer

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W. J. ...
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JOSEPH L. STONAKER
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PRINCETON, NEW JERSEY 08540

(609) 921-2155

ATTORNEY FOR Township Committee of the Township of Plainsboro, Defendant.

314

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION-MIDDLESEX COUNTY
DOCKET NO.

C-4122-73 ✓

URBAN LEAGUE OF GREATER NEW)
BRUNSWICK, a non-profit)
corporation of the State of New)
Jersey, et als.,)

Plaintiffs,)

vs.)

THE MAYOR AND COUNCIL OF THE)
BOROUGH OF CARTERET; et als.,)

Defendants.)

Civil Action

ANSWER of Defendant, Township
Committee of the Township of
Plainsboro.

The Defendant, Township Committee of the Township of
Plainsboro, the duly elected governing body of said township, a duly organized
municipal corporation of the State of New Jersey, by way of answer to the within
complaint, says:

I. PRELIMINARY STATEMENT

1. The within named defendant does not have sufficient
knowledge, information or belief to either admit or deny the allegations of
paragraph 1 of the Preliminary Statement of the Complaint and puts Plaintiffs
to their proof.

2. The within named Defendant denies each and every allegation of paragraph 2 of the Preliminary Statement of the Complaint.

3. The within named Defendant does not have sufficient knowledge, information or belief to either admit or deny the allegations of paragraph 3 of the Preliminary Statement of the Complaint.

II. PLAINTIFFS

4. The within named Defendant does not have sufficient knowledge, information or belief to either admit or deny the allegations of paragraphs 4, 5, 6, 7, 8, 9, 10, and 11 of Plaintiffs section of the Complaint.

III. CLASS ACTION ALLEGATIONS

5. The within named Defendant does not have sufficient knowledge, information or belief to either admit or deny the allegations of paragraph 12 of the Class Action Allegations section of the Complaint.

6. The within named Defendant admits the allegations of paragraph 13 of the Class Action Allegations section of the Complaint.

IV. FACTUAL ALLEGATIONS

7. The within named Defendant admits the allegations of paragraph 14 of the Factual Allegations section of the Complaint.

8. The within named Defendant does not have sufficient knowledge, information or belief to either admit or deny the allegations of paragraphs 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31 and 32 of the Factual Allegations section of the Complaint.

9. The within named Defendant denies the allegations of paragraph 33, 34 and 35 of the Factual Allegations section of the Complaint.

FIRST SEPARATE DEFENSE

Plaintiffs' claims are barred by waiver, estoppel and laches.

SECOND SEPARATE DEFENSE


The Zoning Ordinance of the Township of Plainsboro with its PCD, PMUD and Cluster Zoning provisions provides for varied housing answering the needs of all economic levels.

THIRD SEPARATE DEFENSE

Plaintiffs have failed to exhaust their administrative remedies.

FOURTH SEPARATE DEFENSE

Plaintiffs lack standing to maintain this action.



Joseph L. Stonaker
Attorney for Defendant, Township
Committee of the Township of Plainsboro

CERTIFICATION

I hereby certify that the within Answer was served within the time prescribed by the Rules of this Court.

I hereby certify that on August 13, 1974, I, the undersigned, mailed to Baumgart & Ben-Asher, Attorneys for Plaintiffs, at 134 Evergreen Place, East Orange, New Jersey, 07018, by certified mail, return receipt requested, a copy of the within Answer of Defendant, Township Committee of the Township of Plainsboro.

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.

Dated: August 13, 1974



Joseph L. Stonaker