

~~W. W. B. B.~~  
CA - Sayreille

7 February 1975

Letter w/ TTS responses to interrogatories  
attached

PI # 968

Pgs 56

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Sayreville

# NATIONAL COMMITTEE AGAINST DISCRIMINATION IN HOUSING, INC.

1425 H Street, N.W., Washington, DC 20005 • (202) 783-8150

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## EXECUTIVE DIRECTOR

Edward L. Holmgren

February 7, 1975

Alan J. Karcher, Esq.  
61 - 67 Main Street  
Sayreville, New Jersey 08872

Re: Urban League of Greater New  
Brunswick, et als. vs. The Mayor  
and Council of the Borough of  
Carteret, et al.

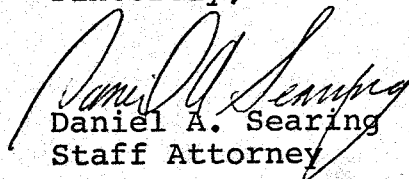
Dear Mr. Karcher:

Enclosed are plaintiffs' responses to  
your interrogatories. I am having the original  
certified by the plaintiffs and will submit  
it to you when this has been completed.

In the past to save double mailing cost,  
we have taken the responsibility of reproducing  
the appropriate copies and forwarding them to  
the other defendants. Unless I hear from you  
within the week, I will assume that is alright  
with you.

We are in receipt of your interrogatories  
and thank you for their submission.

Sincerely,

  
Daniel A. Searing  
Staff Attorney

DAS:blt

Enclosure

CA001882G

FIELD OFFICE: 1425 H Street, New York, NY 10019 • (212) 265-2780

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ALAN J. KARCHER, ESQ.  
Attorney for Defendants Mayor and Council  
of the Borough of Sayreville  
61 - 67 Main Street  
Sayreville, New Jersey 08872  
(201) 257 - 1515

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
MIDDLESEX COUNTY  
DOCKET NO. C-4122-73

URBAN LEAGUE OF GREATER :  
NEW BRUNSWICK, et al., :

Plaintiffs, :

vs. :

Civil Action

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

Defendants. :

INTERROGATORIES ON BEHALF OF  
MAYOR AND COUNCIL OF THE  
BOROUGH OF SAYREVILLE, a  
Defendant

DEMAND is hereby made of the Plaintiffs for Certified  
Answers to the following interrogatories within the time  
prescribed by the Rules of Court.

1. Without referring to any generalities or legal con-  
clusions set forth in the Complaint, please set forth all of the  
facts upon which you intend to rely to sustain your charge in  
paragraph 1 of the Complaint that this particular defendant  
prevents the plaintiffs from residing in this municipality.

See interrogatory 4. It is the operation of these zoning policies  
and land use practices that prevent plaintiffs from having the  
opportunity of residing in Sayreville.

b. Set forth all of the facts upon which you intend to  
rely to establish what the plaintiffs and the class they  
allegedly represent can afford in the way of housing.

See information below regarding individual plaintiffs.

2. Without referring to the generalities or the legal conclusions set forth in the Complaint, please set forth all of the facts you intend to rely upon to establish that this particular defendant prevents the plaintiffs from residing "in close proximity to job opportunities", specifying in particular:

At this time this information is unavailable. See interrogatory numbers 39, 40, 41, 42, 43, and 44 for additional information regarding employment.

a. The jobs referred to

b. The jobs the plaintiffs or the class they allegedly represent are qualified for.

3. State specifically all of the facts upon which you will rely to establish that the children of the plaintiffs and the class they allegedly represent are deprived of equal educational opportunities.

Defendants zoning and other land use policies and practices have excluded low-and moderate-income households, especially those with children, from Sayreville, and other defendant municipalities as shown on the attached chart "Racial Characteristics". The resulting over-concentration of minorities in the Central cities is a denial of equal educational opportunities.

4. State specifically all of the facts upon which you will rely in the allegation of paragraph 2 of your Complaint that this defendant discriminates against the plaintiffs, et al., pointing out the specific sections of zoning and other land use policies and practices of this particular defendant.

See attached sheet

b. State specifically the sections of the zoning and other land use policies and practices of this particular defendant which allegedly impede and deter the construction of housing which the plaintiffs, et al. can afford.

At this time, see a, above. The minimum lot sizes, lot widths and low dwelling units allowed per acre all operate to impede and deter construction by increasing costs beyond those which plaintiffs can afford.

5. State specifically all the facts you will rely upon to establish that these alleged policies of this defendant "adversely affect the housing market in the rest of the county and the region of which defendant municipalities are a part" as set forth in paragraph 2 of your Complaint.

At this time, plaintiffs refer to the attached chart regarding housing starts. Plaintiffs will show that the application of zoning and land use policies by Sayreville and other defendant municipalities have reduced the supply of housing, while at the same increasing the cost of housing that is built. Restrictive zoning is cited as an obstacle to the development of an adequate supply of housing. Middlesex County Master Plan (Interim), at 61 (1970). Additionally, Middlesex County 1970-72 annual construction of 3,240 units is only 35% of 1970-84 annual need of 9,176. Projections for the New York Urban Region's 31 Counties-1985,

. . . see attached sheet.

6. State all the facts upon which you will rely to establish that any acts or policies of this defendant are in violation of N.J.S.A. 40:55-32.

See attached sheet

7. State all the facts upon which you will rely to establish that this defendant has been guilty of any violation of

TO ACCOMPANY INTERROGATORY #3

RACIAL CHARACTERISTICS  
OF  
PUBLIC ELEMENTARY AND SECONDARY SCHOOLS

	<u>Total Students</u>	<u>Black</u>	<u>Spanish American</u>	<u>Min. Total</u>	<u>Percentage Minority</u>
Carteret	4,547	278	320	604	13.3
Cranbury*	----	---	---	---	----
Dunellen	1,333	7	9	37	2.8
East Brunswick	10,418	71	73	207	2.0
Edison	14,712	447	152	653	4.4
Helmetta*	---	---	---	---	----
Highland Park	2,437	258	32	304	12.5
Jamesburg	1,164	146	0	146	12.5
Madison	13,106	209	181	449	3.4
Metuchen	3,265	279	47	343	10.5
Middlesex	3,590	106	17	129	3.6
Milltown	900	0	8	14	1.6
Monroe	3,786	657	22	687	18.1
New Brunswick	6,254	3,103	836	3,960	63.3
North Brunswick	3,038	51	34	104	3.4
Perth Amboy	6,517	864	3,204	4,085	62.7
Piscataway	8,569	1,199	89	1,347	15.7
Plainsboro*	----	-----	-----	-----	----
Sayreville	6,772	6	42	59	0.9
South Amboy	966	0	14	14	1.4
South Brunswick	4,143	170	24	249	6.0
South Plainfield	5,245	279	34	326	6.2
South River	3,452	169	34	211	6.1
Spotswood	1,329	4	13	21	1.6

TO ACCOMPANY INTERROGATORY #3

	<u>Total Students</u>	<u>Black</u>	<u>Spanish American</u>	<u>Min. Total</u>	<u>Percentage Minority</u>
Woodbridge	20,261	412	228	689	3.4
TOTAL	125,804			14,689	11.6

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	<u>Total</u>	<u>Percentage of Cty Total</u>	<u>Min. Total</u>	<u>Per. Min.</u>	<u>Min.Per. of Cty Total</u>
New Brunswick and Perth Amboy	12,771	10.2	8,045	63.0	54.8
Other Munici- palities	113,033	89.8	6,644	5.9	45.2

\*Data for School System with Less than 400 Pupils unavailable

SOURCE: U.S. Department of Health, Education, and Welfare. Directory of Public Elementary and Secondary Schools in Selected Districts. Enrollment and Staff by Racial/Ethnic Group. Fall, 1972

ANSWER TO INTERROGATORY #4

At this time, plaintiffs base their allegation on the following facts:

Syareville, N.J. Zoning Ordinance, Art VI, para 18(b) (1961) prohibits trailer coach parks.

Art V, as amended by Ordinance No. 833, Sec. 2 (1963), and Ordinance No. 852 (1963), Schedule of Area, Yard and Building Requirements, requires minimum lot widths of 100 feet in R-10 and R-20 zones, and requires 1400 sq. ft and 1500 sq. ft. of minimum gross floor area in R-10 and R-20 zones, respectively.

Ordinance 1078 ( ) requires 100 sq. ft. of minimum gross floor area for townhouses.

Ordinance 852 (1963), Art XXIX, Sec 1(5) restricts the size of dwelling units in the G-1 zone to 75% one bedroom 25% two bedroom, and no three bedrooms.

Ordinance 1078A ( ) prohibits any two adjacent buildings in its planned unit development from having the same exterior and limits the maximum units per acre to 4 and 4.5 in the development. Additionally, although public housing for the elderly is exempt from this density limit, is not housing for families.

The borough has also zoned an excessive amount of land for industrial use.

Sayreville has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

This information has been taken from the most up-to-date material plaintiffs have access to. Plaintiffs reserve the right to change specifically challenged zoning provisions or land use practices upon receipt of latest ordinances and zoning maps from defendant Sayreville, as requested in plaintiffs interrogatories.



ANSWER TO INTERROGATORY #5

2,000, Table 15, p. 31, Regional Plan Association (1973). Such policies have forced housing seekers to settle in less restrictive areas, or not come to Middlesex County at all. Additional information from the Tri-State Regional Planning Commission and the New Jersey Department of Community Affairs is not now available but will be supplied later.

ANSWER TO INTERROGATORY # 6

At this time, the facts upon which plaintiffs will rely to establish violations of the statutory and constitutional provisions are those alleged in the complaint, and those available to plaintiffs as indicated throughout these interrogatories. Specifically, we will rely on general and specific population figures reviewed in paragraphs 16-20 of the complaint to show minority confinement to central city areas, their exclusion from Sayreville and existing racial discrimination. More specific information on these statistics has been provided in this and other interrogatories.

Plaintiffs will rely on the general income statistics of paragraphs 21 and 22 of the complaint, and the specific income and housing expenditures of the individual plaintiffs to show that plaintiffs and the class they represent cannot afford the type of housing allowed by Sayreville. This information has also been supplied in these and other interrogatories. Plaintiffs will rely on the employment patterns and practices outlined in paragraphs 23-28 to show that employment opportunities for plaintiffs and the class they represent have far outstripped housing opportunities in Sayreville. Such an imbalance will continue to exist, and will increase under current zoning and other land use policies and practices, detailed in interrogatory 4.

## HOUSING STARTS IN MIDDLESEX COUNTY, 1960 - 1973

	<u>1960-64</u>	<u>1965</u>	<u>1966</u>	<u>1967</u>	<u>1968</u>	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>1972</u>	<u>1973</u>
County	20,279	7,880	6,075	5,488	4,579	3,029	1,774	3,523	5,008	2,433
Multi Family	9,861	4,895	3,705	3,195	2,716	958	300	1,784	3,314	942
Carteret	646	23	126	10	40	191	(5)	96	37	38
Multi Family	220	14	118	4	8	10	(5)	20	18 (2F)	28 (2F)
Cranbury	93	14	17	3	2	4	2	6	4	8
Multi Family	60	0	0	0	0	0	0	0	0	0
Dunellen	210	15	5	5	-(11)	5	1	26	28	11
Multi Family	55	4	0	0	-	0	0	10	14	2
East Brunswick	1,686	322	396	280	861	454	370	418	266	5
Multi Family	372	0	96	0	492	154	52	54	75	
Edison	3,687	2,000	694	282	297	239	176	249	114	143
Multi Family	1,537	1,391	350	4	56	0	10	92	8	
Helmetta	52	3	6	(5)	(5)	-	2	(5)	.4	1
Multi Family	28	0	0	(5)	(5)	-	0	(5)	0	0
Highland Park	997	190	10	67	5	4	9	205	5	10
Multi Family	863	182	0	60	0	0	0	200	5	0
Jamesburg	247	219	10 (11)	112	6	1	15	4	14	10
Multi Family	66	210	2	86	0	0	8	0	0	0

TO ACCOMPANY INTERROGATORY #5

	<u>1960-64</u>	<u>1965</u>	<u>1966</u>	<u>1967</u>	<u>1968</u>	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>1972</u>	<u>1973</u>
Madison	3,186	1,062	2,167	129	628	787	62	69	28	36
Multi Family	1,868	886	1,830	32	548	724	2	2	0	0
Metuchen	426	36	21	17	31	18	30	29	29	16
Multi Family	158	0	0	0	0	0	0	0	0	0
Middlesex	712	76	48	599	76	32	21	(5)	16	16
Multi Family	288	24	22	480	6	0	6	(5)	0	0
Milltown	202	18	14	70	35	57	35	62	83	33
Multi Family	39	0	2	0	0	2	5	0	0	0
Monroe	241	55	242	128	150	545	193	212	524	417
Multi Family	0	0	205	0	0	108	68	160	186	0
New Brunswick	391	(PB) 235	103	400	(5)	16	7	(PB) 374	259 (11)	180
Multi Family	363	231	98	387	(5)	0	4		252 (PB)	0
North Brunswick	706	870	201	329	83	67	35	159	1,120	369
Multi Family	223	574	58	152	4	0	0	78	1,000	264
Perth Amboy	526	183	295	204 (PB)	38	64	28	140	343	9
Multi Family	318	71	224	124	12	4	4	108	318	4
Piscataway	1,432	967	813	1,906	651	107	229	347	167	65
Multi Family	459	668	532	1,700	522	0	0	116	24	0
Plainsboro	155	6	9	6	9	9	3	3	485	587
Multi Family	128	0	0	0	0	0	0	0	480	584

TO ACCOMPANY INTERROGATORY #5

	<u>1960-64</u>	<u>1965</u>	<u>1966</u>	<u>1967</u>	<u>1968</u>	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>1971</u>	<u>1973</u>
Sayreville	1,380	295	364	371	267	109	72	94	101	89
Multi Family	1,042	28	4	0	0	0	2	0	4	0
South Amboy	163	25 (9)	68	46	32	6	3	13	8	13
Multi Family	12	6	32	34	28	2	2	6	2	12
South Brunswick	187	36	125	236	25	34	136	179	203	227
Multi Family	0	0	100	190	0	0	0	0	0	0
South Plainsfield	404	122	70	151	65	131	62	77	87	49
Multi Family	8	0	4	14	2	2	0	2	6	0
South River	575	94	52	36	10	9	147	110	175	10
Multi Family	136	11	26	2	0	0	140	98	164	0
Spotswood	164	156	44	37	20	30	6	8	121	16
Multi Family	8	138	0	0	0	0	0	0	113	0
Woodbridge	3,610	986	172	146	190	160	135	644	791	80
Multi Family	1,992	585	0	8	0	2	2	475	650	0

Article one, paragraph 1 of the New Jersey Constitution.

See interrogatory 6.

8. State all the facts upon which you will rely to establish that this defendant has been guilty of any violation of Article one, paragraph 5 of the New Jersey Constitution.

See interrogatory 6.

9. State all the facts upon which you will rely to establish that this defendant discriminated against any of the civil rights of the plaintiffs or said class.

See interrogatory 6.

10. State all the facts upon which you will rely to establish/<sup>the charge</sup>that this defendant has caused the plaintiffs or their class to be segregated in the public schools of this defendant.

At this time, this information is unavailable.

11. State all the facts upon which you will rely to establish that this defendant has caused the plaintiffs or said class to be segregated by reason of race, color or national origin.

The application of Sayreville's (and other defendant municipalities) challenged zoning and other land use policies (detailed elsewhere) has had the effect of concentrating minority population in central cities, and less restrictive zoning areas, or prevented them from obtaining housing within the County at all. Population figures have been detailed elsewhere.

12. State all the facts upon which you will rely to establish that this defendant violated any of the rights of the plaintiffs or said class to freely assemble or to petition for redress of their grievances.

Plaintiffs will not press this allegation.

13. State all the facts upon which you will rely to establish that this defendant violated any of the rights of the plaintiffs or said class guaranteed under the Thirteenth Amendment to the United States Constitution.

See interrogatory 6.

14. State all the facts upon which you will rely to establish that this defendant violated any of the rights of the plaintiffs or said class guaranteed under the Fourteenth Amendment to the United States Constitution.

See interrogatory 6.

15. Please provide the following information with reference to plaintiff Urban League of Greater New Brunswick, as of July 23, 1974:

a. Give the names and addresses of all officers of said League as of said date.

See attached sheet.

## Board of Directors

### President

Mrs. Janeth E. Scott  
9 Franklin Court  
Somerset, N.J. 08873  
828-5290 (H)  
932-7470 (O)

### Class

'76

### 1st Vice President

Mr. John S. Brown  
93 Crooked Tree Lane  
Princeton, N.J. 08540  
609-924-7812 (H)  
524-8266 (O)

'77

### 2nd Vice President

Mr. LeRoy Carmichael  
2 John Street  
Metuchen, N.J. 08840  
548-6694 (H)  
609-393-2325 (O)

'76

### Secretary

Mrs. Monica R. Lett  
381 Broad Street  
Apartment 8-709  
Newark, N.J. 07104  
484-6244 (H)  
212-433-4200 (O)

'75

### Treasurer

Mr. Leonard Williams  
41 Delores Avenue  
Metuchen, N.J. 08840  
494-7588 (H)  
846-4500 X249 (O)

'75

b. The total membership of said organization as of said date. Approximately 200

c. The assets and liabilities of said organization as of said date. This question is improper, since such information is not calculated or likely to advance the issues included in this case.

d. Set forth all of the facts upon which you will rely to establish that the members of said League are directly injured and aggrieved by the zoning or other land use policies of this particular defendant.

At this time, such members are injured and aggrieved by the racially discriminatory and exclusionary practices referred to throughout these interrogatories.

e. Set forth all the facts upon which you will rely to establish that the members of said League are unable to challenge this defendant's conduct without

the assistance of the League. A substantial number of Plaintiff Urban Leagues' members are low or moderate income blacks who live in New Brunswick, and the surrounding area. Through collective action, these victims of discrimination seek to advance their rights. Without the force of numbers and inherent moral support, each would be unable to institute and maintain this litigation, which is of significant public interest.

f. Specify all of the assistance being furnished the individual plaintiffs by the Urban League of Greater New Brunswick in this litigation.

The Urban League is not furnishing assistance to the individual plaintiffs.



g. Set forth all the facts upon which you will rely to establish that the individual plaintiffs are unable to challenge this defendant's conduct without assistance of the National Urban League.

The allegation to which defendant refers does not relate to the individual plaintiffs. The above language refers only to members of the Urban League.

h. Set forth all of the financial assistance being rendered by the National Urban League to the individual plaintiffs in the prosecution of this litigation.

The National Urban League is not furnishing financial assistance to the individual plaintiffs in the prosecution of this action.

i. State whether any similar omnibus suit against all the municipalities in one county has been instituted by the National Urban League.

No such omnibus suit has been filed.

j. If the answer to the above interrogatory is in the affirmative, give full details: Not applicable

i. Date said litigation was initiated

ii. By whom it was financed.

iii. The outcome thereof.

16. Please furnish all the facts with reference to the individual plaintiff Cleveland Benson:

a. Give the name and age of plaintiff's wife.

Zora B. Benson, 40.

b. Give the name and age of each of the seven

children of said plaintiff.

Vera, age unknown

Wilma Jean, 17

Lois Jean, 14

Norma Jean, 11

Terry, 15

James, 12

Rodney 11

c. Give the name and age of the one grandchild.

Regina, 6

d. Give the names and present residence of the parents of said grandchild.

Vera, Buffalo, New York

Father's address unknown

e. Specify the rent this plaintiff is presently paying for the four bedroom house he occupies at

425 South 8th Street, Highland Park, N. J.

Plaintiff Benson moved from this address in November 1974, to 290 Redmond Street, New Brunswick, N.J. He was paying \$285 per month, plus utilities, sewer and water.

f. State the rent this plaintiff paid for the two bedroom apartment he rented in Jamesburg from

March until June, 1974.           \$210 + utilities

g. Specify the type of work this plaintiff does at the Kaiser Aluminum Company Plant in Edison, N. J.

Deaco oven

Mr. Benson is an/inspector at Kaiser.

h. List any other income of the plaintiff or any other member of his family as of this date.

Mrs. Benson has been employed at Page Puzzle Co., since September 1974. She is paid \$100 per week. She was laid off in early January, 1975

i. State specifically what monthly rental this plaintiff feels he could afford to pay for a four bedroom house.

Mr. Benson could pay approximately \$250-300 per month, including utilities.

j. State all the facts upon which this plaintiff will rely to establish that less expensive quarters than he is presently paying for could be provided for him and his family in suburban Middlesex County.

This question runs to the question of the appropriate remedy, should plaintiffs prevail. At this time, prior to a full hearing on the merits, it is premature and inappropriate to discuss remedies.

k. State the purchase price range of home which this plaintiff believes he could afford to purchase. \$20-25,000.

l. State how much of a down payment said plaintiff would be able to make on the purchase of said home. Could not now make a downpayment, but hopes to save up to \$2,000 during 1975, to use as a down payment.

m. State where the plaintiff would obtain the balance of the financing of such home. Thru bank, savings and loan, or mortgage company.

n. State whether the plaintiff is eligible for V.A. or F.H.A. mortgages.

Plaintiff has used VA eligibility, but could qualify for FHA in certain circumstances.

o. State whether the plaintiff has a good credit rating, giving all the facts upon which said claim is relied. No, plaintiffs credit rating is not good.

17. Please furnish the following information with respect to the individual plaintiff Fannie Botts:

a. Age of the plaintiff.

At this time, Mrs. Botts is withdrawing from this litigation for personal reasons.

b. The name and age of her husband.

Halbert Botts

c. Explain why the plaintiff's husband has not joined in this suit.

See a, above

d. The names and ages of their three children.

See a, above

e. Full address of the housing project in which plaintiff now resides, giving: 334 Stockton St., Apt 7G  
Perth Amboy, N.J. 08861

i. The number of dwelling units in the entire project. 126

ii. The number of apartments occupied by whites.  
At this time, this information is not available.

iii. The number of apartments occupied by non-whites.  
At this time this information is not available

f. Specify amount of monthly rental paid for Apartment 7-G at 334 Stockton Street, Perth Amboy, N. J.  
\$146.00

g. Specify husband's employment, with particular reference to the type of work he does.

See a above.

h. List any other working skills held by the plaintiff's husband.

See a, above

i. Give the names of the "nearly all-minority schools" which the plaintiff's children attend.

See a, above

j. In reference to each school listed in answer to the above interrogatory give:

i. The total number of students in attendance  
At this time, this information is not available.

ii. The total number of minority students  
attending same

See a, above

iii. The total number of white students  
attending same

See a, above

k. Specify in detail in what respects plaintiff's present living environment is not satisfactory.

See a, above

l. State specifically in what respect plaintiff's children's educational opportunities are not satisfactory.

See a, above.

18. Give all the following facts with reference to the individual plaintiff Judith Champion:

a. Give the plaintiff's age and educational background.

26, Completed 2 years college as of June, 1975

b. Give full name, age and residence of her husband.

Richard David Champion, 26  
Address unknown (Plaintiff is separated from husband)

c. Give the names and ages of her two children.

Christine, 7  
Eric 4

d. Give the name and age of the female friend with whom plaintiff shares an apartment in New Brunswick.

Eileen Abott, 25

e. Describe fully the three bedroom apartment at

12 Eulner Street, South Amboy, New Jersey. The apartment is the second floor of a two family home. It has 3 bedrooms, a dining room, living room, kitchen (with stove, own refrigerator) and a garage. It is carpeted. There is also a yard area which tenants are not allowed to use.

f. Give the name and address of the owner of said three bedroom apartment.

Mrs. Frank Travskowski, 20 Gillen Drive, Sayreville, N.J.

g. Specify the rent paid for the three bedroom apartment at South Amboy.

\$275 month/plus approximately \$80 month utilities (gas and electric)

h. State whether or not the rent for the New Brunswick apartment is shared and if so in what proportions.

Rent and utilities are shared, each person paying 50%.

i. State what courses the plaintiff is pursuing in

Middlesex County College.

Sociology, Psychology, English, History, Math, Statistics, Biology, Environmental Sciences, Spanish, all leading to an Associates Degree.

j. State the gross amount of income the plaintiff receives from welfare.

\$310 per month.

k. State how this income is calculated.

All income is under ADC program, and the amount is a flat rate grant for two children. No special computations are done.

l. State for how long a period this plaintiff has been receiving such welfare.

Started December, 1971.

m. Explain why the plaintiff's husband has not joined in this suit.

Plaintiff is separated from her husband. His location is unknown.

n. State all the facts by reason of which said plaintiff believes she can obtain a "healthier environment" than where she is presently residing.

The present cost of living deprives plaintiff and her family of many necessities, if the cost of shelter were reduced, plaintiff could find less crowded housing in a less polluted area.

o. Specify all unhealthy conditions existing under her present environment.  
pollution, overcrowded (son and daughter share bedroom), unintegrated.

p. Specify in what price range the plaintiff believes she would be able to purchase a house.

At this time, plaintiffs circumstances of attempting to complete her education make it impossible to consider purchasing a home in the foreseeable future.

q. Specify what down payment said plaintiff would be able to make on the purchase of her own home.

See p above

r. State how plaintiff would propose to finance the balance of the purchase price.

See p, above

19. Give all the following facts pertaining to the individual plaintiff Lydia Cruz:

a. Give age of plaintiff, and educational background.

Anna Lydia Cruz, 42, Associates Degree, Middlesex City College

b. Give full name, age and residence of her husband.

Plaintiff divorced from husband, 1970.

c. Specify husband's employment, with particular reference to the type of work he performs.

See b, above

d. Explain why her husband has not joined in this suit.

See b, above

e. Give the names and ages of the nine children.

See attached page.



ANSWER TO INTERROGATORY #19e.

Benjamin	age 18	SSN: unknown
Carmen	" 17	"
Samuel	" 15	137-56-5622
Daniel	" 14	none
Francis	" 13	"
Yvette	" 10	"
Lillian	" 9	"
Sarita	" 7	"

Not residing with Plaintiff, but maintaining legal residence with her

Joseph	age 19	SSN: 153-56-9473
Harry	" 21	unknown

f. Specify the amount of monthly rental paid for the four bedroom apartment at 334 Stockton Street, Perth Amboy. \$192 per month

g. State specifically in what respects "the maintenance of the common areas is poor" at the public housing project where plaintiff lives.

No guards for security, poor lighting, maintenance people don't incinerate regularly, painting is cheap and poor. No recreational facilities, no supervised recreation.

h. State how long this plaintiff has been receiving welfare payments.

Since 1966

i. Specify in what price range the plaintiff believes she would be able to purchase a house.  
No more than \$25,000 or \$250 in mortgage payments per month.

j. Specify what down payment this plaintiff would be able to make on the purchase of her own home.  
\$600.00 or less

k. State how this plaintiff would propose to finance the balance of the purchase price.  
Thru current employment, and home mortgage.

20. Give all the following facts pertaining to the individual plaintiff Barbara Tippet:

a. Age of plaintiff.  
25

b. Name and age of her husband.

Cecil Tippet, 26;

c. Name and age of each of <sup>her</sup> three children.

Tyrone Alexander, 5; Michael Denine, 2; Denise Michell, 1.

d. Give the name and the address of the owner of the two bedroom apartment at 51 Burnet Street, New Brunswick, N. J.

Mr. J. H. Woolhiser, 1 Chester Circle, New Brunswick, N.J.

e. Specify the rent plaintiff is now paying for said apartment.

\$169 per month

f. State whether plaintiff is in arrears in said rent and if so for how much.

No.

g. State if husband's employment as a painter is working for others or as an independent contractor.

Working for others.

h. State the area in which plaintiff's husband presently does his painting work.

Local in N. Plainfield, but work is scattered throughout Northern New Jersey.

i. State all the facts upon which plaintiff would rely to establish that housing elsewhere in the county would be closer to her husband's work.

Housing located in the Northern part of the county would be closer to the local and to actual work locations throughout Northern New Jersey.

j. State all the facts upon which it will be relied to establish that plaintiff's children would attend "better schools" elsewhere than where they are presently attending.

See attached page

ANSWER TO INTERROGATORY # 20 j:

Plaintiff believes that the schools in the defendant suburban communities are better than in New Brunswick. The educational facilities are newer and of higher quality, the class room setting is not as segregated, the teachers do not have to spend as much time disciplining, and there is more exposure to children from enriched backgrounds.

k. Explain why this plaintiff's husband has not joined in this suit.

At time of filing, he didn't think he would have time to participate, because of employment overtime commitments.

21. Give the following facts specifically in reference to the individual plaintiff Kenneth Tuskey:

a. How long he has lived at Kendall Park, N. J.  
Since 1964

b. Whether he is the owner or renter of said premises.  
He is the owner

c. If owner specify initial cost of same and balance due on mortgage, if any.  
\$16,500, balance approx \$12,000

d. If renting said premises specify the name and address of the owner of same and the amount of rent paid.  
Not applicable

e. Give the marital status of said plaintiff.  
He is married

f. Give the names of all other members of Kenneth Tuskey's family.

Marie A. Tuskey, Lynne Tuskey, Timonthy Tuskey, Keith Tuskey

g. State all the facts by reason of which it is implied that where plaintiff presently resides is not a racially integrated community.

Plaintiffs 1970 census tract statistics shows 2661 whites, 6 Blacks and no Puerto Ricans.

h. State all the facts upon which it is claimed that the community he now resides in is not an economically integrated one.

Plaintiffs 1970 census tract statistics show 5.1% low income, 14.6% moderate income, and 78.7% above moderate income.

i. Give the plaintiff's present place of employment and specify the type of work performed.

At this time, plaintiff is on educational leave from his job as Supervisor, Housing Unit, Middlesex County Welfare Board, 125 New Street, New Brunswick, N.J.

j. State the plaintiff's present monthly and yearly income.

Approximately \$12,900, when plaintiff returns to his job in January, 1976.

22. Give all the following facts in detail with reference to the individual plaintiff Jean White:

a. Age of the plaintiff. unknown

b. Marital status of plaintiff. Divorced

c. Specify whether plaintiff is living with or separated from her husband. Divorced

d. If seperated give the date of separation and present residence of husband.

At this time this information is not known.

e. If not separated state why plaintiff's husband has not joined in this suit.

Not applicable

f. Give the name and exact age of each of the eight children residing with plaintiff.

Denise - 20; Jeanie - 21, William - 19; Dorene - 18;  
Richard - 17; Sylvia - 16; Brenda - 12; Walter - 4.

g. Give the names and ages of the two grandchildren living with the plaintiff.

Sharona, age unknown  
Alicia, age unknown

h. Give the name and the address of the owner of the three bedroom apartment which plaintiff is presently renting in Piscataway.

Thelma Curtis Lee  
Gerard Street, New Brunswick, N.J.

i. State the amount of rent plaintiff is presently paying for said three bedroom apartment.  
\$275 plus utilities

j. State whether said rent is in a current position or if it is delinquent and if so the amount of the delinquency.  
At this time this information is not available.

k. State how long this plaintiff has been receiving welfare payments.  
Since 1962

l. State the amount of monthly payments received as welfare.  
\$420 per month

m. State all other sources of revenue on a weekly or monthly basis.  
None

n. State all the facts upon which this plaintiff relies to establish that she is living in a "black enclave" in Piscataway.

1970 Census Block statistics show that the blocks surrounding plaintiffs house range from 93-100% black.

o. Give total number of homes in said black enclave.  
At this time this information is unavailable.

p. Give the total number of blacks living in said enclave.  
At this time this information is unavailable.



q. Give the total number of non-blacks living in said enclave.

At this time this information is unavailable.

r. Specify in what price bracket this plaintiff would be interested in acquiring a larger house in the Piscataway area.

Plaintiff is interested in smaller apartment, for approximately \$200 per month.

s. State what down payment, if any, this plaintiff would be able to pay on said house.

Plaintiff is not interested in purchasing a house.

t. State how this plaintiff would finance the balance of said payments.

Not applicable

u. If plaintiff is seeking a larger house to rent, specify the rental brackets she proposes or expects to pay for same.

Because her grandchild might be relocated, plaintiff is seeking smaller, less expensive housing.

v. List the additional expenses that would be involved with the larger house she has in mind and where she proposes to obtain the money to pay for same.

See v, above.

23. State whether or not the plaintiffs claim that the seven individual plaintiffs specifically named in the suit represent a class and are typical of the class they represent.

Plaintiffs represent a class of low-and moderate-income persons, white and non white, who are unable to secure decent, safe and

sanitary housing within the 23 defendant municipalities at rents or prices they can afford. Their claims are typical of the class they represent.

24. State if a characteristic of the class is that the female members thereof are either unmarried or not living with their husbands.

No.

25. State whether a characteristic of the class is that the members thereof rely mainly on government furnished welfare payments for their present housing needs.

No.

26. State whether or not it is alleged that the seven specifically named plaintiffs are characteristic of the class they represent, with particular reference to the employment opportunities they allege to be deprived of by virtue of their present residences.

Those plaintiffs employed, seeking employment or who will be seeking employment are so representative.

27. State whether or not the seven specific plaintiffs are representative of the class they allegedly represent with particular reference to the allegations of deprivation of equal educational opportunities as set forth by the seven individual plaintiffs.

Those class members with school age children are certainly so representative.

28. State specifically if it is claimed that these seven individual plaintiffs are typical of the class this suit purports to represent.

They are. See interrogatory 23.

29. State the estimated number of the said class they allegedly represent in each of the 23 municipalities made defendants.

See attached chart, "Low and Moderate Income Families in Middlesex County, 1970." It is of course, impossible to determine how many of these families are seeking housing, which is partially determinative of the class.

30. State the number of individuals in the class which the plaintiffs in this suit allegedly represent, in the two cities which have been omitted from this suit, namely:

a. New Brunswick

See 29 above

b. Perth Amboy

31. State whether or not there has been any individual canvass of these representative minority groups presently residing in Perth Amboy and New Brunswick, to determine their individual wishes with respect to this class action.

There has been no such canvass.

32. State all the facts upon which it is alleged that any substantial number of the said minority population in New Brunswick and Perth Amboy desire to move to the suburbs, or in fact would not object and protest any such effort to move them.

See attached sheet

TO ACCOMPANY INTERROGATORY #29

LOW AND MODERATE INCOME FAMILIES

IN MIDDLESEX COUNTY, 1970

	<u>Total Families</u>	<u>Low Income</u>	<u>Moderate Income</u>
Carteret	5,883	744	1,316
Cranbury	600	102	76
Dunellen	1,845	258	434
East Brunswick	8,224	432	833
Edison	17,364	1,295	1,309
Helmetta	256	17	102
Highland Park	3,851	610	707
Jamesburg	1,163	171	331
Madison Township	10,251	1,128	2,247
Metuchen	4,218	447	629
Middlesex	3,883	376	668
Milltown	1,736	132	273
Monroe	2,256	202	433
New Brunswick	8,837	2,185	2,177
North Brunswick	4,495	396	800
Perth Amboy	10,379	2,431	2,826
Piscataway	9,383	978	2,474
Plainsboro	369	54	79
Sayreville	8,200	595	1,570
South Amboy	3,752	391	549
South Brunswick	3,479	314	580
South Plainfield	5,209	421	756
South River	4,102	555	826
Spotswood	3,017	186	371
Woodbridge	24,836	2,118	4,868
COUNTY TOTAL	146,936	16,538	28,024

SOURCE: U.S. Census of Population Social and Economic Characteristics of the Population

U.S. Census of Population and Housing, Census Tracts for Tracts for Newark SMSA.

ANSWER TO INTERROGATORY #32

No such allegation is contained in the complaint. Clearly plaintiffs and the class they represent are seeking decent, safe, and sanitary housing at rents and prices they can afford. Persons not desiring to move, and not seeking housing are not class members. No one until now has ever proposed "an effort to move" the minority population of the central cities. The plaintiffs hope that the outcome of this action will be increasing opportunities for better housing should the class members, white and nonwhite, in the central cities and in the Northeastern New Jersey area desire to move. It is the denial of such opportunity that is under challenge here, and is documented throughout these interrogatories.

33. State all the facts upon which it is alleged that this defendant comes within the "Standard Metropolitan Statistical Area" according to the U. S. Bureau of the Census.

Sayreville, as one of the 25 municipalities comprising Middlesex County, was included in the SMSA designation in "Statistical Reporter" 73-12, June, 1973, pp. 192-197.

34. Give the name of the one city (or twin cities) having a population of 50,000 or more upon which you rely to establish that the County of Middlesex as an entity becomes a definitive Standard Metropolitan Statistical Area for the purpose of this suit.

Middlesex County is officially designated as the New Brunswick - Perth Amboy-Sayreville SMSA by the Office of Management and Budget.

35. State whether it is the claim of the plaintiffs that they also represent the minority population in Essex and Hudson Counties and if so state all the facts upon which said claim is based.

Plaintiffs represent class members in the eight county region of Northeastern New Jersey, which includes Bergen, Essex, Hudson, Middlesex, Morris, Passaic, Somerset and Union. See class definition in Interrogatory

36. State all the facts upon which it is alleged by inference that the minorities moving into Middlesex County between 1960 and 1970 did not choose Perth Amboy and New Brunswick voluntarily and based upon their own particular likes and dislikes and their own convenience.

The operation of defendants zoning and other land use policies and practices acted to remove the opportunity of minorities to move elsewhere. The challenged provisions and other statistics have been detailed elsewhere. Prior to 1968, widespread public and private discrimination prevented minorities from moving in. Detailed information on this is not presently available.

37. State all the facts upon which it is alleged that such minorities as moved into the 23 municipalities in the 1960-1970 period were "confined" to areas of pre-existing minority concentration, as alleged in paragraph 20 of the Complaint.

See attached sheet.

38. State all of the facts upon which it is alleged that these areas in these 23 municipalities are characterized by sub-standard housing, higher density and less restrictive zoning than in the white population areas, giving facts and specific locations in each of the 23 communities. Please do not rely upon reference to general statements or legal conclusions set forth in the Complaint.

At this time, detailed information as to substandard housing is unavailable. See Piscataway interrogatory 8 for specific examples of higher density and less restrictive zoning around Black population centers in that municipality. Research is being completed on other defendants.

ANSWER TO INTERROGATORY # 37

This interrogatory is not fully applicable, since minority population in Sayreville decreased during this period.

The sources of such facts are:

U.S. Bureau of Census. Census of Population and Housing: 1970 Census Tracts. Final Report PHC (1) - 146 Newark, N.J. SMSA

U.S. Bureau of the Census. Census of Housing: 1970 Block Statistics, Final Report HC (3) - 159 New York, N.Y.

Northeastern New Jersey Urbanized Area, Part 3 - Northeastern New Jersey.

Zoning Maps and ordinances and actions of individual towns (now in discovery).

See Piscataway interrogatory 8 for an example of specific information. At this time additional research is being completed for other municipalities.



39. State all of the facts upon which you will rely to establish that "Most of the low and moderate wage jobs in the county" are in the 23 defendant municipalities.

The Middlesex County Planning Board's adopted Interim Master Plan (September, 1970) states that "most of the present and projected new jobs including most of the new low and moderate income jobs are growing outside the older municipalities" (p.67).

40. State the number of low or moderate income jobs which have arisen in each of the 23 defendant municipalities since 1960, and describe the qualifications required to fill such jobs.

This information is not now available, but will be submitted at a later date.

41. State all the facts upon which you are going to rely to establish that "Most of the black and Puerto Rican persons who work in Middlesex County are employed in low and moderate wage jobs", specifying the number so employed in each of the 25 municipalities separately in Middlesex County.

According to the attached Chart, Most of the blacks and Spanish speaking persons employed in Middlesex County are employed in such low and moderate wage occupations as operatives, laborers, and service workers (see attached chart).

TO ACCOMPANY INTERROGATORY #41

TOTAL AND MINORITY GROUP EMPLOYMENT  
IN MIDDLESEX COUNTY, 1971

	<u>Total Employed</u>	<u>Spanish Speaking</u>	<u>Black</u>
Total Employed	117,148	4,450	10,967
White Collar	57,735	739	2,625
Craftsmen	11,249	272	580
Service Worker	6,133	298	1,020
Operatives	30,843	1,918	4,557
Laborers	11,188	1,223	2,185

SOURCE: Equal Employment Opportunity Commission.

42. State all of the facts by reason of which it is alleged that "Most of the black and Puerto Rican persons who work in Middlesex County are employed in low and moderate wage jobs.", giving specific statistics as to each of the 25 municipalities. See 41, above.

43. State all the facts upon which you will rely to establish that "Of the blacks and Puerto Ricans who work in Middlesex County, more than 40 percent live outside the county", specifying in particular the locations in which they live and specifying also in detail the type of employment they are engaged in and the qualifications for such work.

The source of this fact is 1971 Report on Total and Minority Group Employment, Middlesex County New Jersey. Tri-State Regional Planning Commission, "Persons at Work During Census Week by Place of Work" Middlesex County, New Jersey, 1970 Census Report P4M-P35A-C.

See attached chart.

TO ACCOMPANY INTERROGATORY #43

PLACES OF RESIDENCE FOR  
PEOPLE EMPLOYED IN MIDDLESEX COUNTY

	<u>Total</u>	<u>Black</u>	<u>Spanish</u>	<u>Total Black and Spanish</u>	<u>Percentage</u>
County Total	186,558	11,585	3,214	14,799	
Live Outside County	44,884	5,699	416	6,115	41.3
Live in County	141,674	5,906	2,798	8,704	
Live in New Brunswick and Perth Amboy	25,220	3,356	2,164	5,520	37.3
Live in 23 defendants	114,303	2,250	634	2,884	19.4

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Carteret	5,204	173	181	
Cranbury	575	67	0	
Dunellen	1,017	0	0	
East Brunswick	7,320	56	29	
Edison	16,479	251	148	
Helmetta	340	0	0	
Highland Park	5,072	268	0	
Jamesburg	1,578	173	0	
Madison	8,088	38	77	
Metuchen	4,233	255	7	
Middlesex	2,401	22	0	
Milltown	2,222	0	0	
Monroe	1,860	116	13	

TO ACCOMPANY INTERROGATORY #43

	<u>Total</u>	<u>Black</u>	<u>Spanish</u>
New Brunswick	12,659	2,527	323
North Brunswick	5,390	101	12
Perth Amboy	12,561	829	1,841
Piscataway	7,399	520	20
Plainsboro	261	7	0
Sayreville	8,086	0	9
South Amboy	2,632	0	0
South Brunswick	2,905	52	44
South Plainfield	3,584	108	0
South River	5,645	93	0
Spotswood	2,073	0	0
Woodbridge	19,939	240	94

SOURCE: Tri-State Regional Planning Commission, "Persons at Work  
During Census Week by Place of Work" 1970 Census Report  
P4M - P 35 A-C

44. State all the facts upon which you will rely to establish that of all the black and Puerto Rican persons working in Middlesex County only 21 percent live in the 23 defendant municipalities, specifying the exact number so employed in each of the 23 municipalities.

See chart accompanying Interrogatory #43, above.

45. State precisely the following information with reference to the "class" which the plaintiffs allege they represent in this suit:

a. Approximate number in said class

The class has a potential membership of 400,000 (See Plaintiffs' memo in Support of Motion to Certify the Class)

b. Identify the persons in said class by:

i. Their color

white and nonwhite

ii. Their ethnic background unknown

iii. Their present residences

the eight county area of Northeastern New Jersey, plus Middlesex County.

c. Is it claimed by the plaintiffs that the "class" consists of minority groups other than the blacks and Puerto Ricans, and if so specify each of the other categories in said class, giving their age, occupation and residence.

That portion of the class listed as nonwhite consists of, in addition to Blacks and Puerto Ricans, Indians, Japanese, Chinese, Filipino, and all other (U.S. Census designations). Their age and occupation are varied, as with other class members. Their residences are as above.

d. State precisely how the plaintiffs have ascertained this "class".

See Plaintiff's Memorandum In Support of Motion to Certify the Class, at 8-9.

e. State specifically and in detail whether or not the plaintiffs have attempted to persuade any other members of this class to join with them in this litigation.

Plaintiffs will not answer this question since they consider such question improper, legally irrelevant and not calculated a likely to advance the issues involved in this case. If class members are identified as potential witnesses, their names will be submitted at the proper time.

f. If your answer to the above is in the affirmative, state what attempts to persuade them were used, giving full details as to same.

See e, above.

g. Have the plaintiffs or their agents contacted any members of the class other than the specific plaintiffs mentioned in the suit?

See e, above.

h. If your answer to the foregoing is in the affirmative, give the name and the address of each person so contacted.

See e, above

i. If these contacts have been oral give the names and addresses of persons who made such oral contacts and what was said between the representatives of the plaintiffs and the other members of said class whom they claim to represent but who are not listed in the litigation as individual plaintiffs.

See e, above.

j. If such contacts were in writing furnish copies of each such communication and indicate to whom they were addressed and the results thereof.

See e, above



k. If said contacts with members of the alleged class other than the named plaintiffs was by advertisements or other public notices give full details, attaching copies of such advertisements or notices.

Not applicable

46. Is it the intention of the plaintiffs to give notice of this pending suit to all the members of the class they purport to represent and if so when will this notice be given and from what source will the plaintiffs secure the names and the addresses of the other members alleged to be in this class?

As this is a R. 4:32-1(b)(2) class action, notice is not specifically required. However, no final decision as to notice has been made, and the above requested information is unavailable at this time.

47. Give the following information with respect to the other members alleged to belong to the class which the plaintiffs purportedly represent:

a. Are they alleged to reside in the two municipalities in Middlesex County which are not defendants in this suit?

Yes, in addition to the eight counties in Northeastern New Jersey

b. If so, give the name and address of each of said members living in said two municipalities.

Plaintiffs are unable to supply the requested information for other members of the class since the members of the class are too numerous and are not presently ascertainable.

c. If they are alleged to reside in the other 23 municipalities which are defendants in this suit give their names and addresses with reference to each specific municipality.

See b above.

d. State whether the members of said class are alleged to presently live in single family homes under \$15,000 in value as determined by the property tax rolls.

At this time this information is unavailable.

e. If the other members of this class are alleged to live in single family houses having a value between \$15,000 and \$25,000 as determined by the property tax rolls specify the number of said class which reside in said homes of that value.

At this time this information is unavailable

f. If it is alleged that the members of this class live in one bedroom apartments specify:

i. The number so residing

See attached sheet.

ANSWER TO INTERROGATORY #47i

Undoubtedly some members of the class so reside. However, Plaintiffs are unable to supply the requested information since class members are too numerous and are not presently ascertainable.

ii. The names of the said members of said class.

See i, above.

iii. The address of each of said one room apartments.

See i, above.

g. If it is alleged that a number of members of this class reside in mobile homes give the exact number and the locations of said mobile homes.

See i, above.

48. Is it alleged that all or a substantial part of the members of said class depend upon welfare as their principal means of income?

No it is only alleged that class members possess the common attributes found in the class definition.

a. Specify the members of said class relying upon welfare payments.

Not applicable.

b. Specify the location or address of each member of said class relying on said welfare payments.

Not applicable.

c. Specify the welfare offices out of which they obtain this support, giving the exact address of such welfare offices.

Not applicable

49. If it is claimed that either the plaintiffs or the members of the alleged class they represent had made requests for amendments to any one of the 25 municipalities in the county to permit them to either build on lots of sub-standard size or to build a home containing less square footage than presently called for in said zoning ordinances give the names and addresses of said plaintiffs or members of the class who have made such applications and state in what municipalities, since January 1, 1970.

It is not so claimed.

50. State if it is the objective of the plaintiffs and the class they allegedly represent to obtain through this litigation additional housing facilities in the 23 municipalities?

Explain fully.

See attached sheet.

51. Is it the purpose of the plaintiffs and the class they allegedly represent to secure racial integration in said 23 municipalities? If so, explain same fully.

See 50 above

52. Is it the intention of the plaintiffs and the class they allegedly represent to obtain through this litigation "economic integration" in the 23 municipalities? If so, explain fully.

See 50 above.

INTERROGATORY #50

Our legal position will be fully explicated at the appropriate time, either through pre-trial briefs or through other orders of the court. Plaintiffs' claim only that they are entitled to be free from discrimination in seeking equal housing opportunities. If plaintiffs prove their case, it may well be that as a matter of equitable relief, the court will order that plaintiffs are entitled under the law to additional housing facilities, racial, and economic integration mentioned in the interrogatories below. However, the question of appropriate relief is one to be decided by the court after a full hearing on the merits, and it would be premature, as well as inappropriate, for the plaintiffs to discuss the scope of relief.

ANSWER TO INTERROGATORY #53

Mayor John E. Czernikowski, 186 Pulaski Avenue, Sayreville, N.J.  
Council members Kenneth W. Buchanan Sr, 12 Henry St. Sayreville, N.J.  
Alvin W. Jolly, 95 Pulaski Avenue, Sayreville, N.J.  
Thomas R. Kuberski, 108 McCutcheon Avenue, Sayreville, N.J.  
Raniero Travisano, 471 South Pine Avenue, South Amboy, N.J.  
Felix Wisniewski, 5 Hilltop Avenue, South Amboy, N.J.  
Joseph M. Keenan, 356 Main Street, Sayreville, N.J.  
Planning Board Members, Henry L. Tomkonson 46 Fach Avenue, Sayreville, N.J.  
Frederick N. Fischer, 13 Frederick Place, Parlin, N.J.  
Charles Grodzki, 10 Miliken Road, Sayreville, N.J.  
Francis J. Seaman, 26 Liberty Street, South Amboy, N.J.  
John Gwizdak, 24 Pulaski Avenue, Sayreville, N.J.  
Thomas Pervell, 39 Florence Drive, Parlin, N.J.  
Carl Meyerton, 17 Main Street, South River, N.J.  
John B. Gaveron, 81 Deerfield Road, Sayreville, N.J.  
Howard M. Schoor, 356 Main Street, Matawan, N.J.

Ernest Erber, NCDH, 1425 H Street, N.W. Washington, D.C. 20005  
John Prior, NCDH, 1425 H Street, N.W. Washington, D.C. 20005

Mr. James P. Sweeney, Area Dir., Dept HUD, Gateway #1, Newark N.J.  
Mr. Hyman Center, Chairman, Middlesex Cty Plng Bd. Cty Admin. Bldg.  
JFK Sq., New Brunswick N.J. 08901  
Dr. J. Douglas Carroll, Jr., Exec. Dir. Tri-State Reg. Plng. Comm.  
1 World Trade Ctr. 56 So. N.Y., N.Y. 10048;  
Richard A. Ginman, Dir., Div. of State & Reg. Plng. 329 West  
State St. P.O. Box 2768, Trenton, N.J. 08625

53. Please furnish names and addresses of all persons having relevant knowledge of the facts set forth in the Complaint.

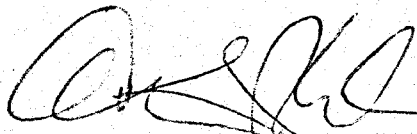
See attached sheet.

54. Please furnish the names of all expert witnesses you intend to call, their field of expertise and attach copies of all oral or written reports.

This information is not presently available.

THE MAYOR AND COUNCIL OF  
THE BOROUGH OF SAYREVILLE

By:



Alan J. Karcher, Borough Attorney



CERTIFICATION IN LIEU OF OATH OR AFFIDAVIT

I certify that the foregoing statements made by me in the attached answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment for contempt of court.

Dated, , 197 .

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