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Sayreville

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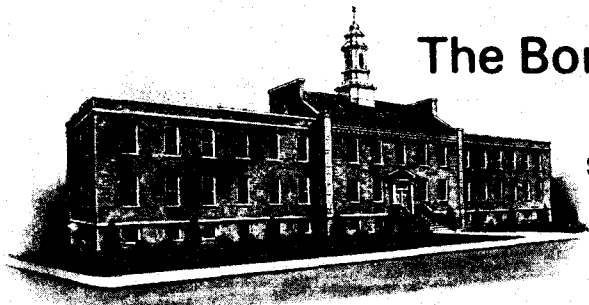
UL v. Curtner

- Let's reference to enclosure
- v/Answers to Roggs

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The Borough of Sayreville

MIDDLESEX COUNTY
167 MAIN STREET
SAYREVILLE, NEW JERSEY 08872
(201) 257-3200

MAYOR:
JOHN E. CZERNIKOWSKI
BOROUGH COUNCIL MEMBERS
PRESIDENT
FELIX WISNIEWSKI
KENNETH W. BUCHANAN, Sr.
ALVIN W. JOLLY
JOSEPH M. KEENAN, Jr.
THOMAS R. KUBERSKI
RANIERO TRAVISANO

OFFICERS OF THE BOROUGH:
MARY J. KOSAKOWSKI, Clerk
ALAN J. KARCHER, Attorney
HOWARD M. SCHOOR, Engineer
JAMES I. LINDSAY, Treasurer
J. HOWARD KOLB, Tax Assessor
JAMES P. DOLAN, Tax Collector

January 16th, 1976

Daniel A. Searing, Esq.
National Committee Against
Discrimination in Housing, Inc.
1425 H Street
N.W. Washington, DC 20005

REC-111
JAN 22 1976

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

Dear Mr. Searing:

Enclosed herewith please find the Borough of Sayreville's
Answers to Supplemental Interrogatories.

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

Very truly yours,

Alan J. Karcher
Alan J. Karcher
Borough Attorney

AJK:lg
enclosure

cc: All Counsel of Record.

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

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: Alan Karcher, Esq.
167 Main Street
Sayreville, N.J. 08872

DEMAND is hereby made of the defendant BOROUGH OF
SAYREVILLE 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 30, 1975, which you
contend are justified by peculiar circumstances.

The entire Zoning Ordinance and all land use practices of the Borough of Sayreville are justified by circumstances, peculiar to the Borough of Sayreville.

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.

See defendant's response to earlier Interrogatories and Request for Admissions.

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

See Pre-Trial Memorandum.

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

Same as Supplemental Interrogatory #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:

(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

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

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.

Personnel of Superior Air Products Co., 2001 Jernee Mill Road, Sayreville, N.J., and Personnel of E.I. DuPont, Parlin, N.J. 08859. Other names of experts previously submitted.

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.

See attached. Other reports to be provided prior to trial.

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 number of mobile homes in Sayreville that exist as non-conforming uses.

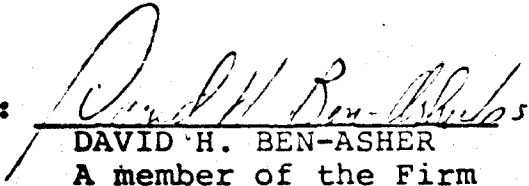
None.

10. 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).

None.

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: _____



E. I. DU PONT DE NEMOURS & COMPANY
 INCORPORATED
 PARLIN, NEW JERSEY 08859

FABRICS AND FINISHES DEPARTMENT

December 5, 1975

Alan J. Karcher,
 Borough Attorney
 The Borough of Sayreville
 Sayreville, N. J.

Dear Mr. Karcher:

The Du Pont Company has two plants occupying an approximate 300 acre site in the Borough of Sayreville. We have many buildings plus associated utilities widely spread over this area.

Retention of this site and maintaining its present industrial zoning is vital to the present and future health of our business.

Sincerely,

J. F. McGettigan
 J. F. McGettigan, Plant Manager
 Fabrics & Finishes Department

R. G. Melega
 R. G. Melega, Plant Manager
 Photo Products Department

BETTER THINGS FOR BETTER LIVING THROUGH CHEMISTRY