

at ULv. Carteret (S. Plainfield)

11/26/74

interrogatories of Lydia Cruz

p.i. 994
pgs. 5

CA002082 G

File Copy

SANFORD E. CHERNIN
FRANKLIN STATE BANK BLDG.
FRANKLIN MALL OFFICE
1848 EASTON AVENUE
SOMERSET, N. J. 08873
(201) 469-5576

ATTORNEY FOR Deft., Mayor and Council of the Borough of
South Plainfield

Plaintiff

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

vs.

Defendant

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

SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION:
MIDDLESEX COUNTY

Docket No. C 4122-73

CIVIL ACTION

INTERROGATORIES

TO: DAVID BEN-ASHER, ESQ.
BAUMGART & BEN-ASHER, ESQS.
Attorneys for Plaintiffs
134 Evergreen Place
East Orange, New Jersey 07018

PLEASE TAKE NOTICE, that demand is hereby made of the plain-
tiff, Lydia Cruz, for Certified Answers to the following Interro-
gatories within the time prescribed by the rules of this Court.

Interrogatories 1-4 are identical to those answered in plaintiff
Benson's reply and are incorporated herein by reference and made
a part of this interrogatory as if fully set forth here in.

5. Give your full and correct name, age, social security number and present address.

Anna Lydia Cruz, age 42; SSN 580-26-0006, 334 Stockton Street
Perth Amboy, New Jersey 08861

6. Identify each member of your family with whom you are presently residing, setting forth their respective ages, and social security numbers.

| | | |
|----------|--------|--------------|
| 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 |

7. Set forth the exact name and address of each and every one of your employers from the year 1970 to date. Also state:

- (a) your job title.
- (b) annual salary
- (c) date when you first commenced working for such employer.

1970 - unemployed

1971-73 Family Counseling Services, 901 Raritan Ave.,
Highland Park, Welfare Specialist, \$6,500 (approx.);
early 1971

late 73
Feb 74 unemployed

March 74
to present Middlesex County Economic Opportunities Corporation,
287 State Street, Perth Amboy, social worker
\$6,500 (approx)

8. Set forth the amount and the source of all other incomes for yourself and each member of your resident household.

Only other income is an approximately \$500 per month welfare payment.

9. Give detailed explanation and data pertaining to each application which you or each and every member of your resident household has made for relief or for welfare. Also state the amount of money so received and the dates of receipt of such funds.

First applied for welfare in 1966, at which time \$98.00 was received every 15 days. Payments have continued since that date, with appropriate statutory increases.

10. Give a chronological history of each application made by you in an attempt to locate housing facilities within the Borough of South Plainfield.

None.

11. Give the name of each real estate broker or agent or other person or firm to whom you made application or any other attempt to obtain housing facilities within the Borough of South Plainfield.

Not applicable

12. Set forth the amount of money which you feel that you are capable of expending toward the cost of housing within the Borough of South Plainfield.

\$200 per month.

13. Describe in detail the exact type, location and quality of housing which you would like to have within the Borough of South Plainfield. Set forth also the number of bedrooms and other rooms of such housing facility which you deem necessary or desirable for your purposes.

I would like 10 rooms, 6 bedroom, kitchen, 2 baths, and a playroom anywhere out of Perth Amboy. I would like it close to schools, in an integrated community.

14. Set forth a full description of the location type and quality of the housing accommodations in which you and/or your family have resided since 1970.

I live in a ghetto, 15 years in an overcrowded public housing project in Perth Amboy. This project is poorly maintained. The apartment has four small bedrooms, a living room with attached kitchenette, and only 1 bath. There is only one entrance door. There is almost no ventilation and cooking odors stay. The halls to the bedrooms are very small, closets and storage is inadequate. There is no shower. There is very little room in the living room. There are no recreational facilities, in or out. There are 126 large families within the same project. The ghetto school nearly provides a poor education. There is crime and drug abuse within the project.

15. As to the previous question and answer, give the name and address of your landlord and/or mortgage company and state the period of residence at each such location.

Perth Amboy Housing Authority, 881 Amboy Avenue, Perth Amboy, New Jersey.

16. Set forth the reasons why it was necessary for you to change residences or locations as set forth in your previous answers.

Not applicable

17. Attach hereto a copy of any retainer or authorization which you executed in favor of the Urban League of Greater New Brunswick to participate with you in this litigation or to act on your behalf with regard thereto.

None

18. Give a history of any and all applications which you made for building permits within the Borough of South Plainfield.

None

19. Give a history of any and all applications which you made for a variance before the Board of Adjustment of the Borough of South Plainfield.

None

20. Give a history of any and all builders or contractors who you attempted to engage for the purposes of erecting new housing within the Borough of South Plainfield. If you received any appraisals or cost estimates with regard to the same, attach a copy of same hereto.

None

Interrogatories 21-53 are identical to those answered in plaintiff Benson's reply and are incorporated herein by reference and made a part of this interrogatory as if fully set forth here in.

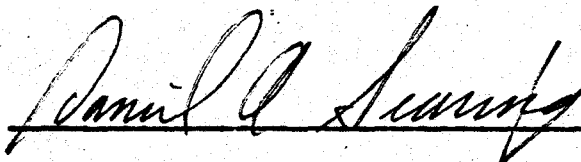
CERTIFICATION

I hereby certify that the copies of the reports annexed hereto rendered by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

By _____

CERTIFICATION IN LIEU OF OATH OR AFFIDAVIT

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 for contempt of court.



DANIEL A. SEARING
Co-Counsel

DATED:

November 26, 1974