

CA

UL v. Cortez (S. Plainfield)

11/26/74

interrogatories of Judith Champien

Pi. 997
pgs 5

0020836
CA ~~0020836~~

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 H. 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, Judith Champion, for Certified Answers to the following In-
terrogatories 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.

Judith Ann Champion, 26, 136-42-7891
12 Eulner Street, South Amboy, N.J. 08879

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

Christine age 7 no SSN
Eric age 4 no SSN

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.

Jan-April, 1971 Fedders Corp., Edison, N.J., Secretary,
\$85.00 per week (approx)

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

Scholarship grant from Middlesex County College, \$1,000 per year
Rent & utilities are split 50-50
Food and other joint living expenses are split 66-33

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.

In ^{Sept} Dec., 1971, when I was first separated, I applied for assistance under the Aid to Dependent Children program from the Middlesex County Welfare Board. I received \$282 per month, until July, 1974, when the payment increased to \$310.

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.

None.

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.

\$140 per month, including utilities.

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 a house, in a good school district, in a less polluted area. I would need 2 bedrooms, living room, family room, kitchen, and 1 bath.

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.

Jan, 70 - Jun 72: 7 Farley Lane, Sayreville, 2 bedroom house, with kitchen, living room and bath. This was my aunt's (Mary Farley) home. I had to leave shortly after my husband and I separated.

July 72 - Nov 72 63 Ellenel Blvd, Spotswood. This was my mother's home, while I was searching for a place to live. Her name is Norma Glock

Nov 15 - Jun 1, '74 25 Eulner St., South Amboy, shared a 3 bedroom apartment with 2 other women. The children and I shared 1 bedroom. The landlord was Alex Rannuci, the resident owner. We left when he increased the rent \$50 per month, and made it clear the children were not welcome.

Jun 1, 74 - present At present address, sharing 3 bedroom with one other women. This gives more room but means higher rents. The landlord is Frank Truszkowski, 20 Gillen Drive, Parlin.

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.

See interrogatory 14.

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

See interrogatory 14.

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.

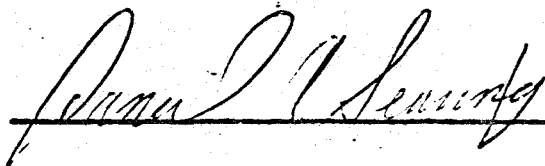
CERTIFICATION

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