

CA UL v. Carteret (S. Plainfield)

11/26/74

interrogatories for Fannie Botts

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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, Fannie Botts, for Certified Answers to the following Inter-  
rogatories within the time period 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.

1. Give the name and address of each person or firm known to this plaintiff to have relevant knowledge of the material facts set forth in the complaint.

2. Give the name and address of each expert witness whose testimony will be relied upon at the time of trial.

3. Attach hereto a copy of all written reports of experts upon whose testimony this plaintiff will rely at the time of trial.

4. If no written reports have been received give the time, date and place of any interviews or oral discussions with experts and also set forth in detail the full content of such discussions.

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

Fannie Botts age and SSN, unknown  
334 Stockton Street, Apt 7-G, Perth Amboy, N.J. 08861

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

Halbert, husband, age, and SSN unknown; 3 children, ages 11, 6, and 2, names 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.

This information is unknown at this time.

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

This information is unknown at this time.

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.

This information is unknown at this time.

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

This information is unknown at this time.

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.

See interrogatory number 10.

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.

This information is unknown at this time.

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.

Suburban area for raising the children without discrimination. Other information is unknown at this time.

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.

1970 - unknown

1971-72 (approx) 220 Fayette St, Apt 4, Perth Amboy, N.J.

72-present present address. Other information is unknown  
(approx.) at this time.

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.

Present landlord is Perth Amboy Housing Authority. Other information is unknown at this time.

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

This information is unknown at this time.

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.

This information is unknown at this time.

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.

See interrogatory 18.

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.

See interrogatory 18.

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.

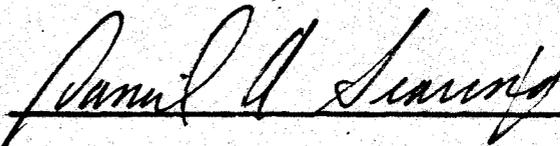
CERTIFICATION

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