

CA - South Plainfield. 26-NOV-74

Interrogatories demanded by S. Plainfield
of Plaintiff Kenneth Tuskey.

psc = 4

Blue P.l. # 3483

CA002091G

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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
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 plaintiff, Kenneth Tuskey, for Certified Answers to the following Interrogatories within the time period prescribed by the rules of this Court.

Interrogatory number 1 is 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.

KENNETH TUSKEY

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

\$67.00 per month, permanent statutory award, Service Connected Disability.

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.

Food stamp, app. Sept, Oct. Nov; \$150 stamps for \$41.00 cash
No applications for relief or welfare. Applied and approved for food stamps (\$150.00 in stamps for \$41.00 cash) for months of Sept., Oct., Nov.

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

No such application.

✓ 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, see 10 above.

✓ 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.

Not applicable, as not looking for housing within South Plainfield.

✓ 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.

See 12, above.

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.

Resided since 1964 in ranch-style, 3 bedroom, 2 bath, located at address in Number 5, of good quality.

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.

Jersey Mortgage Co; Elizabeth, 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.

No such authorization has been executed.

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.

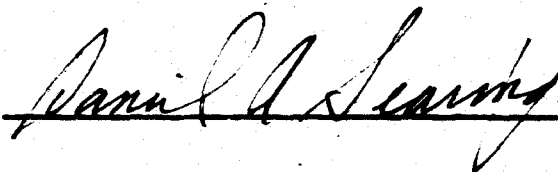
CERTIFICATION

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