

CA - Cranbury

1/13/84

Answers to interrogatories of Δ Typo

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Attorneys for Plaintiff, Garfield & Company

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MIDDLESEX COUNTY

PLAINTIFF, GARFIELD & COMPANY
FIRST SET OF INTERROGATORIES

LAWRENCE ZIRINSKY,

Plaintiff,

vs.

THE TOWNSHIP COMMITTEE OF THE TOWNSHIP OF
CRANBURY, A Municipal Corporation, and
THE PLANNING BOARD OF THE TOWNSHIP OF
CRANBURY,

Defendants.

JOSEPH MORRIS and ROBERT MORRIS,

Plaintiffs,

vs.

TOWNSHIP OF CRANBURY IN THE COUNTY OF
MIDDLESEX, A Municipal Corporation of the
State of New Jersey,

Defendant.

GARFIELD & COMPANY,

Plaintiff,

vs.

MAYOR and THE TOWNSHIP COMMITTEE OF THE
TOWNSHIP OF CRANBURY, A Municipal Corporation,
and the members thereof; PLANNING BOARD OF
THE TOWNSHIP OF CRANBURY, and the members
thereof,

Defendants.

CRANBURY DEVELOPMENT CORPORATION, A
Corporation of the State of New Jersey,

Plaintiff,

vs.

CIVIL ACTION

DOCKET NO.: L-079309-83 P.W.

DOCKET NO.: L-054117-83

DOCKET NO.: L-055956-83 P.W.

DOCKET NO.: L-59643-83

CRANBURY TOWNSHIP PLANNING BOARD and the
TOWNSHIP COMMITTEE OF THE TOWNSHIP OF
CRANBURY,

Defendants.

BROWNING-FERRIS INDUSTRIES OF SOUTH JERSEY,
INC., A Corporation of the State of New
Jersey, RICHCRETE CONCRETE COMPANY, a
Corporation of the State of New Jersey,
and MID-STATE FILIGREE SYSTEMS, INC.,
a Corporation of the State of New Jersey,

Plaintiffs,

vs.

DOCKET NO.: L-058046-83 P.W.

CRANBURY TOWNSHIP PLANNING BOARD and
THE TOWNSHIP COMMITTEE OF THE TOWNSHIP
OF CRANBURY,

Defendants.

URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al.

Plaintiffs,

vs.

DOCKET NO.: C-4122-73

THE MAYOR and COUNCIL OF THE BOROUGH OF
CARTERET, et al.,

Defendants.

CRANBURY LAND COMPANY, a New Jersey Limited
Partnership,

Plaintiff,

vs.

DOCKET NO.: L-070841-83

CRANBURY TOWNSHIP, A Municipal Corporation
of the State of New Jersey located in
Middlesex County, New Jersey,

Defendant.

TO: William C. Moran, Jr., Esquire
Attorney for the Mayor and The Township Committee of the
Township of Cranbury
Cranbury-South River Road
Cranbury, New Jersey 08512

SIR:

PLEASE TAKE NOTICE THAT Garfield & Company hereby requests that the Mayor and The Township Committee of the Township of Cranbury answer the following Interrogatories under oath within the time prescribed by the Rules of Court.

WARREN, GOLDBERG, BERMAN & LUBITZ
A Professional Corporation

BY: 

WILLIAM L. WARREN, ESQUIRE

DATED: January 13, 1984
Princeton, New Jersey

I. INSTRUCTIONS

A. Each Interrogatory shall be construed to include information within respondent's knowledge, possession, custody or control or the knowledge, possession, custody or control of respondent's agents as of the date of its answers to these Interrogatories as well as any information, knowledge, date, document or communication that subsequently is obtained or discovered and that demonstrates that any answer originally provided in response to these Interrogatories was incorrect or incomplete in any way when made or subsequently became incorrect or incomplete; such supplemental information to be promptly supplied.

B. For each separate Interrogatory identify each of those individuals with whom you consulted, upon whom you relied, or who otherwise constituted a source of information for you in connection with the preparation of your answers to these Interrogatories.

C. In answering these Interrogatories furnish all information that is known to you or your agents. If any of these Interrogatories cannot be answered in full, answer them to the fullest extent possible, detailing the reasons for your inability to answer the remainder and stating fully the information, knowledge or belief you now have concerning the unanswered portions.

1. State as precisely as possible the number of Development Credits which exist in the Township of Cranbury pursuant to that Township's Land Development Ordinance.

Approximately 1450

2. Detail the factual basis and methodology used in determining the number of Development Credits stated in response to the previous Interrogatory.

A-100 Zone - 3,650 acres including land other than class 1 and 2 which equals 400 acres. Subtracting 10% from the resulting 3250 acres, leaves 2,925 acres. 1 credit for each 2 acres produces the above result.

3. State as precisely as possible the price that you anticipate or estimate that a single Development Credit will bring on the open market; four Development Credits; 100 Development Credits; 200 Development Credits; 400 Development Credits; 600 Development Credits; 800 Development Credits.

See page II-27 & 28 Land Use Plan for all available information regarding this subject.

4. Detail the factual basis and methodology used in determining the amounts stated in response to the previous Interrogatory.

See answer above.

5. If you are unable to provide a price for any number of the Development Credits in response to Interrogatory #4 above, detail the reasons for your inability to do so.

No transactions have yet taken place.