

CA

Piscataway

1-4-85

CL w/answers to foggs on
behalf of "large interest."
(goes to ML suitability of land)

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SCERBO, KOBIN, LITWIN & WOLFF

COUNSELLORS AT LAW
10 PARK PLACE
MORRISTOWN, N.J. 07960

538-4220
AREA CODE 201

ARTHUR R. KOBIN
JACK L. WOLFF
LAWRENCE B. LITWIN
MEMBER OF NEW YORK AND
NEW JERSEY BAR
HILARY B. ROSENBERG

FRANK C. SCERBO
LOUIS S. FREEMAN
OF COUNSEL

January 4, 1985

TO: All counsel on attached service list
FROM: Lawrence B. Litwin
Re: Court appointed expert's reports on
vacant sites suitable for development
of Mount Laurel housing in Piscataway
Township

Enclosed herewith are the answers to Interrogatories on behalf of the
Lange interest.

cc: Jay Lynch
Leonard Lange

BARBARA J. WILLIAMS, ESQ.
Constitutional Litigation Clinic
Rutgers Law School
15 Washington St., Newark, New Jersey 07102
201/648-5687

BRUCE S. GELBER, ESQ.
National Committee Against Discrimination in Housing
733 Fifteenth Street, N.W., Suite 1026
Washington, D. C. 20005
202/783-8150

ATTORNEYS FOR PLAINTIFFS

URBAN LEAGUE OF GREATER]
NEW BRUNSWICK, et al.,]

Plaintiffs,]

vs.]

THE MAYOR AND COUNCIL OF]
THE BOROUGH OF CARTERET,]
et al.,]

Defendants.]

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION/MIDDLESEX
AND OCEAN COUNTIES

Docket No. C 4122-73

Civil Action

PLAINTIFFS' INTERROGATORIES
AND REQUEST FOR PRODUCTION
OF DOCUMENTS PERTAINING TO
THE SUITABILITY FOR DEVELOP-
MENT OF MOUNT LAUREL HOUSING
OF VACANT SITES IN
PISCATAWAY TOWNSHIP

Pursuant to Rule 4:17 and 4:18 of the Rules Governing Civil Practice and the Court's Order confirming the status conference held on December 17, 1984, the Urban League plaintiffs hereby request that the defendant Township of Piscataway and all landowners, option-holders or other interested parties who will offer testimony and/or arguments at the hearing on the Court-appointed expert's reports of July 12, 1984 and November 10, 1984, now scheduled for January 16, 1985, answer the following questions in writing, under oath, and, where requested, provide accurate and complete copies of specified documents.

The answers to these questions shall be served in hand upon all parties by January 7, 1985.

Where addressed to a company, corporation, or business or governmental entity, these questions shall be answered by an appropriate officer or agent of the corporation or entity who shall furnish all information available to the corporation or entity and its agents, employees or attorneys.

The person answering these questions shall designate which information is not within his or her personal knowledge and, as to that information, shall state the name and address of every person from whom it was received, or, if the source is documentary, a full description of the document.

Whenever a full and complete answer to any question or subpart thereof is contained in a document or documents, such document or documents, appropriately identified as answering a specific numbered question or subpart, may be supplied in lieu of the written answer.

Whenever information is requested which was previously furnished in answer to another question, such information need not be restated, and it will suffice to identify the previous answer containing the information requested.

These interrogatories shall be deemed to be continuing so as to require supplemental answers between the date the interrogatories are answered and the time of hearing.

INTERROGATORIES

1. Pursuant to the Court's Order dated June 26, 1984, Ms. Carla Lerman, P.P., issued a preliminary and final report dated July 12, 1984 and November 10, 1984, respectively, which reviewed the characteristics of vacant sites in Piscataway Township pertaining to their suitability for development of Mount Laurel housing and their recommended densities for such residential development. With respect to each and every site identified in Ms. Lerman's reports on which you will offer testimony or arguments at the hearing on those reports, scheduled to commence on January 16, 1985:

- a) State whether you agree or disagree with Ms. Lerman's findings and conclusions.

We agree

- b) To the extent you disagree with Ms. Lerman's findings or conclusions, state your position, contentions and conclusions regarding the suitability of the site, or any portion thereof, for development of Mount Laurel housing and the appropriate density, if, any, for such residential development.

Not applicable

c) State with specificity the basis for the positions, contentions, and conclusions provided in answer to question 1(b) above, and describe in detail all facts and opinions on which you rely in support of each such position, contention and conclusion, and all facts and opinions of which you are aware which are inconsistent with each such position, contention and conclusion.

Not applicable

d) Attach a copy of all reports, studies, surveys, correspondence, memoranda, maps, drawings and other documents upon which you will rely in support of the positions, contentions and conclusions provided in answer to question 1(b) above.

Not applicable

2. State the name and address of each expert witness who will testify on your behalf at the hearing on Ms. Lerman's expert reports, scheduled to commence on January 16, 1985.

Jay Lynch
Queale & Lynch
P.O. Box 2324
Trenton, New Jersey 08607

For each person listed above:

- a) State with specificity his or her area or areas of expertise.

Professional Planner

b) State the basis upon which you contend this person is qualified to testify as an expert, including, but not limited to, his or her professional experience, past and present employment, educational background, consulting experience (including any consultations with municipal or other public entities), publications, and judicial or other testimony; and attach a copy of his or her resume.

To be supplied

c) State with specificity the substance of his or her testimony, and identify or attach all reports, studies, surveys correspondence, memoranda, maps, drawings and other documents upon which he or she will rely in support of his or her testimony.

See attached letters

d) If he or she has prepared any reports, memoranda, correspondence maps, drawings or other written materials relating to any of the matters described in answer to question 1(b) above, please attach a copy.

3. State the name, address, title and profession of each witness not identified in any to question 2 above, who will testify on your behalf at the hearing on Ms. Lerman's expert reports, scheduled to commence on January 16, 1985.

Not applicable

For each person listed above:

- a) State with specificity the substance of his or her testimony.

Not applicable

- b) Identify or attach all reports, studies, surveys, correspondence, memoranda, maps, drawings or other documents upon which he or she will rely in support of his or her testimony.

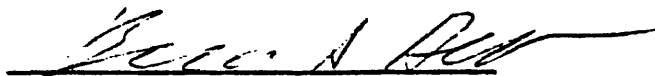
Not applicable

- c) If he or she has prepared any reports, studies, memoranda, correspondence, maps, drawings or other materials relating to any of the matters described in answer to question #1(b) above, please attach a copy.

Not applicable

CERTIFICATION

I hereby certify that a copy of the foregoing
Plaintiffs' Interrogatories And Request for Production of
Documents Pertaining to the Suitability for Development of
Mount Laurel Housing of Vacant Sites in Piscataway Township
has been served by first-class mail, this 20th day of
December, 1984, on all counsel named on the attached service
list.



Bruce S. Gelber